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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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TTY 711 or 800-833-6388 (For the Speech or Hearing Impaired)

March 21, 2005

Mr. Edward McLeary
4008 Pioneer Way E.
Tacoma, WA 98443

Dear Mr. McLeary:

Thank you for your public comment letter received on December 15, 2004, regarding the water quality assessment for phosphorus in Moses Lake. While we are still reviewing the comments we received on the overall statewide assessment and will be providing a general response to comments, I wanted to respond directly to some of your concerns regarding what you consider the department's lack of response to concerns about Moses Lake data.

I apologize for what you perceive as an unfair length of time taken to respond to comments received. The statewide Water Quality Assessment received over 260 comment letters and several new data sets that needed to be assessed. This amount of information to review and analyze took several months given the staff resources available.

I also apologize for the perception that the department did not answer individual detailed questions received during the public comment period last spring. In fact, a public review for a statewide project must generally respond to comments and make changes to the project based on weighing all comments received. It is typical for the department to receive conflicting comments during a public comment period on a decision that the department has made. In the case of the Moses Lake listing for phosphorus, we received ten comment letters that varied in their support of Category 2 or Category 5. Some letters questioned the data that we used and how we arrived at the assessment decision. No new phosphorus data or analysis was submitted for Moses Lake to add support for either category.

In responding to all of the concerns expressed in the varying letters, it made sense for us to step back and take a fresh look at the data. Thus, the department reviewed the data to reconfirm that quality assurance requirements were met on the samples represented in the assessment, analyzed the data based on the location of the samples, and provided that information in a detailed table that was mailed out October 29, 2004



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This assessment resulted in describing three portions of Moses Lake better where the phosphorus levels are a concern, and one portion at the south end of Parker Horn where the data indicates impairment. I should note that the particular area you are most concerned about, in the location of Trout Lodge, was in fact assessed as a Category 2.

I recognize that you may still have questions that you feel are unanswered regarding the data and technical assessment of phosphorus for Moses Lake. I asked our Environmental Assessment Program staff to respond to questions that were received as a part of this most recent review. Their responses are enclosed in the five attachments to this letter.

On a positive note, the City of Moses Lake finds the current listing process for Moses Lake appropriate and reasonable. In addition, the city has expressed an interest in taking a lead role in improving the waters of Moses Lake. We are currently working with them and other interested stakeholders to conduct the necessary monitoring to determine what further work needs to be done. Moreover, the proposed Columbia River Initiative contains some features that, if implemented, would result in additional flows of high quality irrigation project waters through the lake. In the meantime, the Moses Lake TMDL has been put on hold and we do not plan to revisit the priority of this project until the next scoping session for that given area, which will be in 2006.

If you have any further questions about Washington's Water Quality Assessment, please contact me at 360-407-6414, or by email at subr461@ecy.wa.gov.

Sincerely,



Susan Braley
Unit Supervisor
Water Quality Management

Enclosures:

1. Response to general questions on Moses Lake
2. Revised map of Moses Lake Listings
3. Revised Table of Moses Lake Listings
4. Analysis Summary of phosphorus data
5. Memo from Dean Momohara of Ecology's Manchester lab