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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. Jack Rensel  
Rensel Associates  
2409 234<sup>th</sup> Street N.E.  
Arlington, WA 98223

Dear Mr. Rensel:

Thank you for your public comment letter received on December 16, 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 your concern that the department did not answer individual detailed questions on Moses Lake 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

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.



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You question the reason we are using total phosphorus as a basis for indicating impairment, and not considering macrophyte problems that may result. Phosphorus is recognized in both state and federal regulations as a pollutant when too much occurs in the water. It is an indicator of water quality problems. The purpose of the 303(d) list is to identify problem areas so that further study can be done to determine what is needed to keep the water healthy. Further study of the lake for related problems and contributing sources, would be done through a lake management plan or TMDL.

You bring up the issue of monitoring, and we agree that further monitoring would be productive. 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.

I recognize that you still have unanswered questions 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 on Moses Lake as a part of this most recent review. Their responses are enclosed in the five attachments to this letter.

If you have any further questions in regard to Washington's Water Quality Assessment, please contact me at 360-407-6414, or by email at [subr461@ecy.wa.gov](mailto: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