

May 31, 2005

Mr. Barry Burnell
Water Quality Division
Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706-1255

Dear Mr. Burnell:

Thank you for your public comment letter received on December 17, 2004, regarding Washington State's Water Quality Assessment for 2002/2004. The department received over 45 comment letters during this last review process and is appreciative of the time you took to review and comment on this assessment. We realize that there is an extensive amount of information in the Water Quality Assessment. The scrutiny given by you and other public reviewers has resulted in many changes and corrections that improved the accurateness of the final submittal to the Environmental Protection Agency (EPA).

The Water Quality Assessment is being submitted to EPA as an "integrated report" to meet the Clean Water Act requirements of sections 305(b) and 303(d). EPA will only take approval action on Category 5 of the assessment, which represents the state's 303(d) list. The Water Quality Assessment can be viewed at <http://www.ecy.wa.gov/programs/wq/303d/index.html>.

You noted the importance of making it clear in shared waters that Washington and Idaho have different water quality standards. This is a good point and we will make a note in the preface of the report that adjacent state and tribal governments have different standards from Washington's.

The issue of natural conditions comes up whether the water is on shared interstate waters or not. I believe all three neighboring states (Washington, Idaho, and Oregon) have some provision that states whenever the natural conditions of a water body are of a lower quality than the assigned criterion, the natural condition becomes the water quality criteria. That said, it becomes challenging to prove when natural conditions are present, but human activities are also present that contribute to the lowering of water quality. In that case, Washington typically has used the TMDL process to determine contributions from both natural conditions and human activities.

We note your concerns regarding pH listings for the Snake River and will pass that information on to our Eastern Regional Office, as well as your comment on an existing TMDL for Paradise Creek. Ecology does not currently have any pH listings on Paradise Creek, although we do have

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Category 5 listings on Paradise Creek for Ammonia-N and fecal coliform. We will also pass on information regarding e-coli bacteria in the Palouse River at the Washington State line, as noted.

Ecology is working actively with Idaho DEQ, the Kalispell Tribe, and EPA on an interstate TMDL for the Pend Oreille River for temperature and total dissolved gas. Our understanding is that Idaho is taking the lead for modeling from Pend Oreille Lake down to Albeni Falls dam where the river flows into Washington. We believe this inter-jurisdictional TMDL will be successful in identifying both natural conditions and human-related activities happening on the Pend Oreille.

As with other waters mentioned above, we will pass on your information regarding the Spokane River and Hangman Creek. All of these water bodies are under the jurisdiction of our Eastern Regional Office TMDL unit, supervised by Dave Knight (509-329-3590). I'm sure they will agree that improving and enhancing coordination with Idaho DEQ is a very positive step in improving water quality in these shared watersheds.

Thank you again for taking the time to provide comments to Ecology. If you have questions regarding the above responses, or would like further clarification, please feel free to call me at 360-407-6414.

Sincerely,

A handwritten signature in cursive script that reads "Susan Braley".

Susan Braley
Unit Supervisor
Watershed Management Section

cc: Jim Bellatty, ERO Water Quality, Section Manager
Dave Knight, ERO Water Quality, Unit Supervisor