

May 31, 2005

Mr. Ed Chadd and Ms. Hannah Merrill  
Streamkeepers of Clallam County  
223 East Fourth Street, Suite 5  
Port Angeles, WA 98362-3015

Dear Mr. Chadd and Ms. Merrill:

Thank you for your public comment letter received on December 16, 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). The Water Quality Assessment can be viewed at <http://www.ecy.wa.gov/programs/wq/303d/index.html>.

Susan Braley requested that I respond to your comments regarding the bioassessment data submitted by Streamkeepers and in what category it is most appropriate to be placed. The data the Streamkeeper volunteers have collected is useful to our agency as we identify future TMDL work and areas for further monitoring. We have spent a considerable amount of time with your organization on your data submittal, working with you to get the data to a point where we could use it.

It is important to me that people who take the time to comment on our proposals have a clear understanding of the decisions we are making and why we are making those decisions. Susan Braley sent her December 6, 2004 letter explaining our agency decision and why we have placed biological data in category 4C (polluted by a non-pollutant). In addition, Chad Brown has spent a considerable amount of time with you explaining the same decision. Your December 16 letter states you are not satisfied with our response. It appears to me both Susan and Chad have explained our decision and we are in disagreement only on the appropriate path forward. The lack of balanced biologic data *is an indication* of a problem (habitat alteration or pollutant). It is inappropriate from our standpoint to identify the water body as needing a TMDL based solely on biological data without identification of the specific pollutant parameter of concern. .

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It should be noted that many of the water bodies that you have identified are also listed on Category 5 as being polluted by a specific pollutant. Therefore, these water bodies will be addressed through TMDL. When we begin scoping TMDLS in your area, you should request that the biological data and information be a part of the TMDL scoping process.

We will be starting the 2006 listing guidance later this summer and the use of biological information will be one of the issues that we want to address in more detail. The addition of all of these new categories has created a number of issues that need further attention in the listing guidance. Even though we disagree about the proper placement of the biological data, it is my hope that your organization will continue to participate in discussions around these issues, and that you understand we value very much the work you are doing.

Once again, thank you for your interest in Washington's Water Quality Assessment.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Gildersleeve".

Melissa Gildersleeve, Manager  
Watershed Management Section