

**From:** [Feller, Adar](#)  
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**Conversation:** Draft 2008 listings ?"s about Basis & Remarks fields  
**Subject:** 02-Draft 2008 listings ?"s about Basis & Remarks fields

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Dear Ken Koch,

Streamkeepers of Clallam County is in the process of drafting a Review of the Draft 2008 WQA for the data submitted in 2006. I need to better understand the EIM query system before I submit our concerns. Everything that went thru the automatic EIM submission system (all of our water chem, fecal and temperature data) looks great but unfortunately, as I am sure you are aware, our Bioassessment data could not be entered automatically into EIM so we are seeing a lot of errors and inconsistencies there.

Are you the correct person address these questions? I will write up a detailed review of what Streamkeepers feels the errors are to submit later with our Review but I wanted to check on a couple of general things about how the Listing ID query Basis & Remarks fields are populated first.

Is it required that Remarks from the 2004 listing continue on to the 2008 listing even if that information is no longer relevant or did those past Remarks just get carried over automatically and should now be removed? I am speaking specifically of the "This listing was previously placed on Category 4C for biological data in accordance with Policy 1-11. The listing has been moved to Category 2 based on recommendations from EPA, since the data is insufficient to determine if the biological impairment is from a pollutant or pollution. Additional monitoring needs to occur before the sources of impairment can be identified." remark that refers to changes made in 2004 about how to deal with Bioassessment data, a policy that has since been altered yet again. This Remark is included with the listing of most (but not all) of the sites we submitted data for in 2004 and on some listing IDs for sites that are now in Category 5. I understand that editing of Remarks in EIM might not be possible for tracking purposes but I wanted to check on how that process works. I can provide a table of Listing IDs with these Remarks if it would

useful or include that information as part of our Review.

If the 2008 Basis comments do not include post 2004 Bioassessment data would Ecology like that information added and in what format? I realize that the Bioassessment data is not standard but it appears that Basis comments have been rather inconsistent from site to site and are not always complete. I can include listing IDs with what data/dates are missing as part of our Review documents if that would be appropriate and use the most complete and current looking format but I won't go that trouble if that information has been deemed unnecessary. For example Listing ID 42867 uses a detailed complete data format while Listing ID 42938 only gives years data was collected in and is missing 2004 as one of those years.

It appears that several of our locations for Bioassessment data have not been listed. Are there any limitations you are aware of outside of Streamkeepers email communications with Mike Herold and Chad Brown in July of 2007 on the subject of proposed Bioassessment calls? Like are sites where data results have been reported for one year treated any differently than those with data sets in multiple years? This question will be the main focus of our submitted Review and can wait for the appropriate parties to be involved, but I figured I could ask in case you know something. Maybe we somehow submitted an incomplete data set since EIM was having troubles receiving that type of data and a few of the Category 1 listings of healthy streams also not get represented.

Thank you very much for your time. I hope this comment period isn't too crazy for you guys down there.

Cheers,  
~Adar~

Ed Chadd & Adar Feller  
Streamkeepers of Clallam County  
Clallam County Department of Community Development  
223 E. 4 St., Suite 5  
Port Angeles, WA 98362

360-417-2281; FAX 360-417-2443  
streamkeepers@co.clallam.wa.us  
[www.clallam.net/streamkeepers](http://www.clallam.net/streamkeepers)