

The Department of Ecology's Response to: Harry Bell - Green Crow (Comment 06)

The listing decision was made consistently with other temperature listings. Temperature values from the EIM database were organized into a spreadsheet and then compared against the corresponding temperature criteria.

The water segments listed in the comment letter were examined for listing bases. The water segments do have some data that demonstrates no excursions with the criteria. Taken in total however, years other than 2004 exhibit many exceedances of the temperature criteria for listings 7690, 48902, 48896, and 7689. Listings that have associated exceedances only in 2004 include 48292, 48903, 48906, and 48901. Flow rates in a nearby river, the Hoko, were recorded by USGS as less than the 7Q10 low flow rate in August 2004. The category 5 listings based on exceedances only in July of 2004 could be moved to category 2 based on the statistically low flow in August of 2004 in accordance with the listing policy but since the 7Q10 low flows occurred after the recorded temperature exceedances, it would miss the intent of the 7Q10 exclusion.

Timber harvest is an activity that contributes to warmer temperatures not only during harvest but also in subsequent years due to the lack of shade cover. Designated uses are determined by regulation and the criteria are assigned based on the most sensitive use of the water, not the land.