



Draft 2008 Water Quality Assessment and 303(d) List

This form allows you to submit comments or concerns regarding the Draft 2008 Water Quality Assessment and 303(d) List. Please provide as much information as possible in each field. Attach your completed form to an email and send to 303d@ecy.wa.gov or mail directly to: Ken Koch, Washington Department of Ecology, P.O. Box 47600, Olympia, WA 98504-7600.

Name of Person Submitting Comment:	Richard Hoover
Affiliated Organization (if any):	City of Bellingham
Date of Comment:	2/20/08
Listing ID (please list all that apply)	39223
Draft Category:	5
Waterbody Name:	Padden Creek
Parameter:	Temperature
Medium:	Water

Comment:
 The City of Bellingham believes there is sufficient reason and historical data to have the following stream segment removed from category 5 status for temperature on the draft 2008 Water Quality Assessment 303(d) list.

Many of the stream segments listed in the 303(d) for Whatcom County are monitored as part of the City of Bellingham's Urban Streams Monitoring Program. As part of the program, nineteen sites on Bellingham's urban streams are monitored by *grab samples* on a monthly basis for a variety of parameters. This monitoring program has been ongoing for since 1990 and *is the basis on which almost all stream segments within Bellingham City Limits have been listed in previous editions of the 303(d) document.*

While data obtained through grab sampling were acceptable for the categorization of state water conditions in the past, they are no longer considered adequate based on current Ecology data quality criteria. Further, the sampling design for the Urban Streams Monitoring Program was never intended to directly interface with the Ecology rules as they pertain to determination of impaired status, but only to provide context to the water quality observed in Bellingham's urban streams.

If the above stream segment is to remain listed based on older Urban Stream Monitoring Program data, we ask that it be taken into account that this stream segment has not exceeded the recently adopted 16°C core summer salmonid habitat temperature for more than 2 sampling periods in a single calendar year for the most recent 5+ years of data.

Please review the following figure for a more detailed record of historical temperature data for the above mentioned stream segment. The raw data used to compile these figures are available upon request.

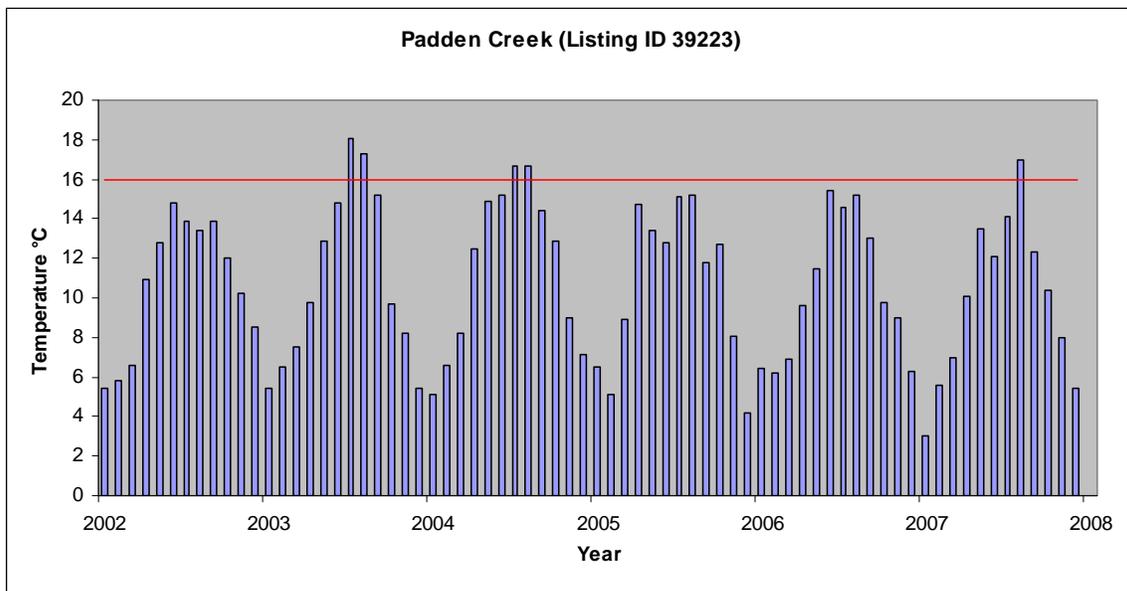


Figure 1. Monthly temperature (°C) measurements for Padden Creek (Listing ID 39223) for the period of 2002-2008. Red line depicts the 16°C criterion level.