

From: [Susan Gulick](#)
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Posted At: Inbox
Conversation: WRIA 16 Planning Unit Comments on draft 303(d) list
Subject: 20-WRIA 16 Planning Unit Comments on draft 303(d) list
Attachments: [WRIA 16 COMMENTS on 2008 Proposed 303\(d\) listing.xls](#)

Dear Mr. Koch

I am writing on behalf of the Watershed Planning Unit for the Skokomish-Dosewallips Water Resource Inventory Area, also known as WRIA 16. Through an inter-local agreement, WRIA 16 also includes the portion of WRIA 14 that drains into Hood Canal. Therefore, the functional boundary of WRIA 16 includes the south shore of Hood Canal and the west shore between Union and Mt. Walker. Members of the Planning Unit include the Skokomish Tribe, Mason County, Jefferson County, Mason PUD #1, Jefferson County PUD #1, the Department of Ecology, representatives of numerous organizations, and citizens.

Attached is a copy of Ecology's 303(d) list for selected streams in WRIA 16 and the portion of WRIA 14 that is part of WRIA 16's planning area. As you will see, we have highlighted (*underlined, italics*) certain statements that the Planning Unit believes merit removal of the stream from the Category listing 5 by the Department of Ecology . (Please note that NONE of the language on the attachment was added by the Planning Unit; we are simply highlighting language on the current Ecology list that may contradict the criteria for listing.) Many of these listings were based on fewer than 5 samples, unpublished data that no longer exists and/or did not have a QAPP. Under the revisions to the Water Quality Policy 1-11, all of these sites would be better classified under Category 1, 2 or 3.

We respectfully ask that Ecology reconsider the inclusion of the following streams on the 2008 Proposed 303(d) List based on this information:

- Great Bend/Lynch Cove 6935
- Twanoh Creek 6961
- Twanoh Falls Creek 6964
- Holyoke Creek 6965
- Trails End Creek 6966
- Deveraux Creek 45567
- Big Bend Creek 45568
- Mulberg Creek 45581

Please let me know if you have any questions. The Planning Unit looks forward

to your response.

Susan Gulick
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2008 Proposed 303(d) Listing
Category 5 - Hood Canal Portion of WRIA 14

3/28/2008

Water Body 2008 Basis	Listing ID			2004 Basis Statement	Remarks
Fecal Coliform Listings:					
GREAT BEND/LYNCH COVE	6935				
<p><i>Mason County unpublished data</i> (submitted by Wayne Clifford on 8/91) show excursions beyond the criterion for both the geometric mean and the percentile criterion at station M4 between 8/1/90 and 8/1/91.</p>		<p>Department of Health <i>unpublished data</i> collected from station HOOD CANAL #9- 286 show a geometric mean of 7 cfu/100mL and 10% of samples exceed the percentile criterion with the last sample collected on 14-Nov-2001.</p>			<p>*** 2008 Basis Statement (carried forward from 2004) ***</p>
TWANOH CREEK	6961				
<p>Location ID [TWANOH CR] -- <i>0 of 5 (0.0%) of samples</i> collected in 2005 exceed the percent criterion (100 col/100mL)</p>	<p>Location ID [TWANOH CR] -- A geometric mean of 1.32 col/100mL calculated from 5 samples collected in 2005 <i>does not exceed</i> the geometric mean criterion (50 col/100mL)</p>	<p>Location ID [TWANOH CR] -- <i>2 of 9 (22.2%) of samples collected in 2004</i> <i>exceed</i> the percent criterion (100 col/100mL)</p>	<p>Location ID [TWANOH CR] -- A geometric mean of 12.80 col/100mL calculated from 9 samples collected in 2004 <i>does not exceed</i> the geometric mean criterion (50 col/100mL)</p>	<p>Mason County <i>unpublished data</i> (submitted by Wayne Clifford on 8/91) meet the criterion for the geometric mean, but exceeds the percentile criterion at station S1 between 8/1/90 and 8/1/91.</p>	<p>Category was determined by exceedances of the fecal coliform percent criteria. [Data collection period(s) -- 2004: Location ID -- TWANOH CR]. <i>More recent data may not meet minimum data requirements of Ecology WQP Policy 1- 11</i></p>

2008 Proposed 303(d) Listing
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TWANOH FALLS CREEK	6964				
Location ID [TWANOH FALLS CR] -- <u>0 of 5 (0.0%) of samples</u> collected in 2005 exceed the percent criterion (100 col/100mL)	Location ID [TWANOH FALLS CR] -- A geometric mean of 2.98 col/100mL calculated from 5 samples collected in 2005 <u>does not exceed</u> the geometric mean criterion (50 col/100mL)	Location ID [TWANOH FALLS CR] -- <u>0 of 9 (0.0%) of samples</u> collected in 2004 exceed the percent criterion (100 col/100mL)	Location ID [TWANOH FALLS CR] -- A geometric mean of 7.66 col/100mL calculated from 9 samples collected in 2004 <u>does not exceed</u> the geometric mean criterion (50 col/100mL)	Mason County <u>unpublished data</u> (submitted by Wayne Clifford on 8/91) show excursions beyond the criterion for both the geometric mean and the percentile criterion at station S2 between 8/1/90 and 8/1/91.	<u>Available data does not meet minimum data requirements of Ecology WQP Policy 1-11 to make a category determination</u>
HOLYOKE CREEK	6965				
Location ID [HOLYOKE CR] -- <u>0 of 5 (0.0%) of samples</u> collected in 2005 exceed the percent criterion (100 col/100mL)	Location ID [HOLYOKE CR] -- A geometric mean of 2.70 col/100mL calculated from 5 samples collected in 2005 <u>does not exceed</u> the geometric mean criterion (50 col/100mL)	Location ID [HOLYOKE CR] -- <u>0 of 9 (0.0%) of samples</u> collected in 2004 exceed the percent criterion (100 col/100mL)	Location ID [HOLYOKE CR] -- A geometric mean of 10.47 col/100mL calculated from 9 samples collected in 2004 <u>does not exceed</u> the geometric mean criterion (50 col/100mL)	Mason County <u>unpublished data</u> (submitted by Wayne Clifford on 8/91) show excursions beyond the criterion for both the geometric mean and the percentile criterion at station S6 between 8/1/90 and 8/1/91.	<u>Available data does not meet minimum data requirements of Ecology WQP Policy 1-11 to make a category determination</u>

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TRAILS END CREEK	6966				
Location ID [TRAILS END CR] -- <u>0 of 3 (0.0%) of samples</u> collected in 2005 exceed the percent criterion (100 col/100mL)	Location ID [TRAILS END CR] -- Fewer than five samples were available in 2005, therefore a <u>geometric mean was not calculated</u> for this period			Mason County <u>unpublished data</u> (submitted by Wayne Clifford on 8/91) meet the criterion for the geometric mean, but exceeds the percentile criterion at station S7 between 8/1/90 and 8/1/91.	<u>Available data does not meet minimum data requirements of Ecology WQP Policy 1-11 to make a category determination</u>
DEVERAUX CREEK	45567				
Location ID [DEVERAUX CR] -- <u>0 of 5 (0.0%) of samples</u> collected in 2005 exceed the percent criterion (100 col/100mL)	Location ID [DEVERAUX CR] -- A geometric mean of 4.48 col/100mL calculated from 5 samples collected in 2005 <u>does not exceed</u> the geometric mean criterion (50 col/100mL)	Location ID [DEVERAUX CR] -- <u>2 of 7 (28.6%) of samples</u> collected in 2004 exceed the percent criterion (100 col/100mL)	Location ID [DEVERAUX CR] -- A geometric mean of 15.04 col/100mL calculated from 7 samples collected in 2004 <u>does not exceed</u> the geometric mean criterion (50 col/100mL)		Category was determined by exceedances of the fecal coliform percent criteria. [Data collection period(s) -- 2004: Location ID -- DEVERAUX CR]. <u>More recent data may not meet minimum data requirements of Ecology WQP Policy 1-11</u>
BIG BEND CREEK	45568				

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Location ID [BIG BEND CR] -- <u>0 of 5 (0.0%) of samples</u> collected in 2005 exceed the percent criterion (100 col/100mL)	Location ID [BIG BEND CR] -- A geometric mean of 6.42 col/100mL calculated from 5 samples collected in 2005 <u>does not exceed</u> the geometric mean criterion (50 col/100mL)	Location ID [BIG BEND CR] -- <u>3 of 9 (33.3%) of samples collected</u> in 2004 exceed the percent criterion (100 col/100mL)	Location ID [BIG BEND CR] -- A geometric mean of 24.26 col/100mL calculated from 9 samples collected in 2004 <u>does not exceed</u> the geometric mean criterion (50 col/100mL)		Category was determined by exceedances of the fecal coliform percent criteria. [Data collection period(s) -- 2004: Location ID -- BIG BEND CR]. <u>More recent data may not meet minimum data requirements of Ecy WQP Policy 1-11</u>
MULBERG CREEK	45581				
Location ID [MULBERG CR] -- <u>0 of 5 (0.0%) of samples</u> collected in 2005 exceed the percent criterion (100 col/100mL)	Location ID [MULBERG CR] -- A geometric mean of 4.91 col/100mL calculated from 5 samples collected in 2005 <u>does not exceed</u> the geometric mean criterion (50 col/100mL)	Location ID [MULBERG CR] -- <u>3 of 9 (33.3%) of samples</u> collected in 2004 exceed the percent criterion (100 col/100mL)	Location ID [MULBERG CR] -- A geometric mean of 17.95 col/100mL calculated from 9 samples collected in 2004 <u>does not exceed</u> the geometric mean criterion (50 col/100mL)		Category was determined by exceedances of the fecal coliform percent criteria. [Data collection period(s) -- 2004: Location ID -- MULBERG CR]. <u>More recent data may not meet minimum data requirements of Ecy WQP Policy 1-11</u>