

**From:** [Sutton, Dorie](#)  
**To:** [Koch, Ken \(ECY\);](#)  
**cc:** [Griffy, Annette; Margaret Oscilia;](#)  
**Subject:** 22-City of Vancouver Comments on Draft WQ Assessment  
**Date:** Monday, March 10, 2008 2:07:43 PM  
**Attachments:** [City of Vancouver 2008 Draft Assessment Comments.doc](#)

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Ken,

Attached to this e-mail you will find our comment letter concerning two specific listings in the 2008 Draft Water Quality Assessment. If you would like me to mail you a hard copy I would be happy to do so. As mentioned previously, the city will be working to correct the map stream line work problems with DNR and our consultant is currently working with Becca Conklin on the EIM data questions.

Respectfully,

*Dorie Sutton*

City of Vancouver  
Surface Water Management  
4500 SE Columbia Way  
P.O. Box 1995  
Vancouver, WA 98668-8460  
360/487-7184  
FAX 360/487-7139  
dorie.sutton@ci.vancouver.wa.us

Draft 2008 Water Quality Assessment  
City of Vancouver Comments  
March 14, 2008

Mr. Ken Koch  
Department of Ecology  
Water Quality Program

The City of Vancouver would like to request a review of two specific 303(d) listings for Burnt Bridge Creek in the Draft 2008 Water Quality Assessment where we believe unreliable data may have created or modified a listing.

Supported by funding from a Clean Water Grant, the city initiated a water quality monitoring effort in 2004 with the consulting firm PBS Engineering and Environmental (PBS). Six monitoring locations were selected to provide continuity and comparability with historical monitoring data and to help assess the effectiveness of improvement projects in the Burnt Bridge Creek corridor.

Monitoring data were collected by PBS in 2004 and 2005 according to protocol outlined in a Quality Assurance Project Plan (QAPP) prepared by PBS and approved by Ecology in June 2004. These data sets were submitted by PBS to Ecology's Environmental Information Management (EIM) database under the User Study ID G0300181. Monitoring by PBS continued in 2006 and 2007 but was not funded by a grant. The data collected in 2006 were submitted to the EIM under the User Study ID BBCWQ06. Data sets collected in 2007 are still in the process of being submitted by PBS and evaluated by Ecology but the 2007 data were not used in the 2008 Water Quality Assessment.

Samples were collected every three weeks from June through October and eight parameters were monitored. When data did not meet the QA/QC standards set out in the QAPP, PBS marked it as unreliable or non-credible and documented the likely cause. Based on communications with Ecology and Water Quality Program Policy 1-11 Chapter 2, all data collected in the study were submitted for inclusion in the EIM database. Comments were included by PBS for all data that did not meet the credible data standards. Problems encountered by PBS in their monitoring at Burnt Bridge Creek included theft and vandalism of equipment, faulty equipment installation, operator error and equipment malfunction. These problems were documented and included with the data submittal.

It appears that some of these data, specifically the pH and dissolved oxygen data from 2006, were not flagged as unreliable in all of the relevant fields in the EIM database. These data appear to have been included along with the credible data in the 2008 assessment. Margaret Oscilia with PBS has been working with Becca Conklin at Ecology to make certain that the previous and current data submittals appropriately identify and flag any problem data.

**Listing ID 7859**      User Location ID BBC4  
Parameter pH          2008 Category 5      2004 Category 2

2006 pH monitoring data was flagged as unreliable by PBS on June 29, Aug 31, Sept 20 and Oct 12 due to equipment malfunction and operator error. Only sampling from two dates, July 20 and Aug 15, provided pH data that met QA/QC standards as specified in the QAPP. One of the two sampling events with credible pH data did show an excursion from the state standard at BBC4; a paired data set collected on July 20 (pH 8.50/pH 8.5).

**Listing ID 50954**      User Location ID BBCUSGC / BBCUSGCA  
Parameter pH          2008 Category 2      2004 Not listed

2006 pH monitoring by PBS provided two days with credible data as indicated by dates listed above. The two paired sets of pH readings at BBCusgc fell within the water quality standard parameters. In 2004 and 2005 there were no excursions from pH standards recorded in eleven separate monitoring events performed by PBS at this site.

In the other listings for Burnt Bridge Creek, inclusion of the non credible data values does not appear to have had any impact on the basis for listing. Margaret Oscilia from PBS has created spreadsheets of all of the 2006 data with added flagging and identification of non-credible data. These spreadsheets will be sent to Becca Conklin at Ecology before the end of the 2008 Water Quality Assessment public comment period. These revisions include the aforementioned pH parameters and should be associated with this letter for any considered Burnt Bridge Creek 303(d) listing modifications for the 2008 Water Quality Assessment.

Thank you for your consideration.

*Dorie Sutton*

City of Vancouver  
Surface Water Management  
4500 SE Columbia Way  
P.O. Box 1995  
Vancouver, WA 98668-8460  
360/487-7184  
FAX 360/487-7139  
dorie.sutton@ci.vancouver.wa.us

cc. Annette Griffy, City of Vancouver, Surface Water Management