

The Department of Ecology's Response to: Ed Chadd – Streamkeepers of Clallam County (Comment 48)

Listing 42823

The listing of stream segments based on bioassessment scores is a new practice for Ecology. We are exercising caution in this first round of listing, in particular because there are neither criteria established in regulations nor rules on how to apply criteria. Use of bioassessment scores to trigger TMDL projects is imprudent for stream segments that have undergone severe channel disturbance or other recent major physical modifications. Healthy bioassessment scores depend on a balanced population in a steady-state where recruitment and natural stream processes have had time to develop. No change, but remark statement is updated.

Listing 21475

The new fecal coliform data referred to in comments by Streamkeepers were not in the EIM database at the time of the initial assessment. New data were considered and included in a reassessment at CCWR_00057. The reassessment results in a change from category 1 to category 2 for fecal coliform and updates to the basis and remarks statements.

Bioassessment nonuse of <2 years data

See response to Croxton, EPA

Listing 21430

The new fecal coliform data referred to in comments by Streamkeepers were not in the EIM database at the time of the initial assessment. New data were considered and included in a reassessment at CCWR_00003. The reassessment results in a change from category 3 to category 2 for fecal coliform and updates to the basis and remarks statements.

Listings 6971 and 45037

These draft listings are in the same water segment and now are combined into listing 6971.

Turbidity

The data did not include the necessary identification of the likely source of the turbidity increase from the upstream to the downstream location. The water quality criteria for turbidity require orientation of sampling around the potential source of turbidity.

Responses to spreadsheet individual listing comments/corrections

Many of these comments requested that we edit old 2004 basis statements. Ecology chooses to leave the 2002/2004 basis statements in as a part of the historical record. The recent 2006/2008 statements supersede the older statements. Revised statements were not added if the previous statements reflect the category call that has not changed in this assessment.

Basis statements are not intended to reproduce all data values that support a listing. Bioassessment values were added to the 2008 basis statements where applicable to assist in documentation for category decisions because the data are not stored in EIM at this time.

Many listings were perceived as missing but are actually listings based on new data but not visible because the listings are in category 3. Category 3 includes 28 bioassessment listings that have only one year of data. Listing 40705 includes data from Location ID CCWR_00037. Listing 42951 includes data from Location ID CCWR_00589.

Listing 40668

Added new basis statement and changed from category 1 to category 2.

Listing 42950

Added new basis statement, no change to category

Listing 42951

Added new basis statement, no change to category

Listing 40698

Added new basis statement, no change to category

Listing 42895

Added new basis statement, no change to category

Listing 40692

Added new basis statement , no change to category