

From: NOREPLY@ECY.WA.GOV
Sent: Monday, July 25, 2011 3:02 PM
To: 303d
Cc: Herold, Mike (ECY); Brown, Chad (ECY); Braley, Susan (ECY); Koch, Ken (ECY)
Subject: *** WQ ASSESSMENT - COMMENT ON LISTING 10155 ***0035

WATS 2010 REVIEW TOOL: Comment on Listing 10155

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SENT: 7/25/2011 3:01:58 PM
WEB LINK: [Listing 10155](#)
MAP LINK: [Listing 10155](#)

COMMENT:

In 2004 this station was not listed as category 5. It was category 2. Now the 2010 proposed listing says it was category 5 in 2004. Why change its history? Who changed its history? See http://apps.ecy.wa.gov/wats08/ViewListing.aspx?LISTING_ID=10155 Also note that the 2008 category 5 listing cites to a Grantham (2005) memo as the basis for category 5, but the Grantham memo actually was the basis for category 2 in 2004, and in 2008 ecology just conveniently sliced off the last sentence of the Grantham memo's reason for category 2 presented in the 2004 list so as to sound like it supported a category 5. There were subsequent efforts in the 2008 listing by Ecology to assert a trend of worsening dissolved oxygen, none of which were valid and which did not get reflected in the 2008 basis, so the only stated 2008 basis for 5 is a falsification of the basis used for 2 in 2004. Interesting history. The new listing basis is at least cleaner, in that it is just a judgment call by EAP, which they can make, but which also does not provide anything that a reviewer can examine. The history of the past justifications concerns me.