



March 31, 2015

**City of White Salmon
Office of City Hall**

DEPARTMENT OF ECOLOGY

APR 14 2015

WATER QUALITY PROGRAM

Mr. Patrick Lizon
Washington State Department of Ecology
Water Quality Program
P.O. Box 47600, Olympia, WA 98504-7600

Re: Proposed addition of Buck Creek and White Salmon River to the 303(d) list for impaired waters

Dear Mr. Lizon:

The City of White Salmon (City) appreciates the opportunity to comment on the proposed addition of Buck Creek and the lower reach of the White Salmon River to the 303(d) list of Category 5 waters impaired for temperature.

The City has long relied on Buck Creek as critical source of water supply for municipal use, and has strong interest in maintaining the quality of that supply for both instream and out of stream uses. To that end, the City routinely coordinates with the Washington Department of Natural Resources (DNR), which owns most of the land in the Buck Creek drainage, to protect the watershed, including limiting logging and road construction on forested lands to minimize impacts to the creek.

The City is also actively developing a Department of Ecology (Ecology) Office of Columbia River funded aquifer storage and recovery (ASR) project that would divert water from Buck Creek during the winter/spring, when flows are higher and temperatures lower, and store it in a hydraulically confined aquifer using an existing City well, with the intent of using stored water to help meet peak summer demands. As part of project, the City has entered into a memorandum of agreement (MOA) with Ecology committing to reduce surface diversions during critical summer periods in an amount equal the quantity stored over the winter. Successful implementation of ASR would both improve reliability of the City's water supply and reduce reliance on surface water from Buck Creek, benefiting critical summer flows. The City is concerned that permitting of this project could be delayed by the proposed Category 5 303(d) listing and possible implementation of a total maximum daily load (TMDL) study.

The City has technical concerns about the basis for listing Buck Creek (listing ID 21594) and the lower reach of the White Salmon River (listing ID 72898) as impaired for temperature. According to information in Ecology's online Proposed Draft Assessment Database for the 303(d) listings, the proposed listing of Buck Creek is based on exceedances of surface water temperature criteria measured between June 15 and August 31, 2001¹. It is our understanding that under Water Quality Program Policy 1-11 in order for Ecology to finalize a Category 5 listing for temperature Ecology needs to assess whether the exceedances are due to human influences or are naturally occurring.

¹ The basis for the proposed Category 5 listing indicates that the 7-day mean of daily maximum values (7DADmax) exceeded the temperature criterion for Buck Creek of 16°C on 21 of 78 days, with a maximum exceedance during this period of 17.12°C for the 7-day period centered on August 14.

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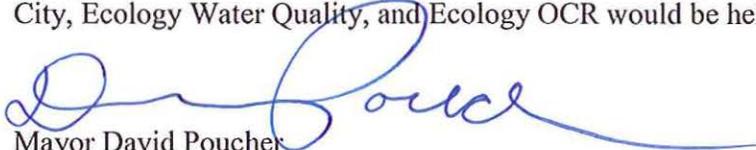
That the observed exceedances may be naturally occurring is supported by the fact that water year 2001² was a moderate drought year in the south Cascades, with about 60 to 70 percent of average spring snowpack and an earlier than normal melt out. Although stream flow data from Buck Creek are limited for this period, the City established a stream gage at the diversion structure in November 2001. This gage was active until May 2004. The November 2001 data, collected about two months after the observed temperature exceedances on which the proposed listing is based, showed Buck Creek flows of about 6 cubic feet per second (cfs); summer and fall low flows over subsequent years never fell below 18 cfs, further supporting that 2001 was an abnormally low flow year in Buck Creek, and likely worse than that suggested by just considering relative snowpack.

Based on the available flow and temperature data and the relatively protected nature of the DNR-lands in the Buck Creek drainage, the City believes the observed temperature exceedances are largely driven by natural summer flow conditions, rather than human caused. We note that in 2001, the City was entirely reliant on its wellfield rather than its surface diversions on Buck Creek, so the City's water supply diversions were not a contributing factor to temperature issues on Buck Creek. However, since 2001, declining groundwater supplies have forced the City to restore its Buck Creek diversion at high cost to both the City and the State, which provided some grant funding for construction of a slow sand treatment plant. The City requests that Ecology carefully consider this information in evaluating whether to include Buck Creek as a Category 5 impaired water for temperature in the final 303(d) list.

Should Ecology's final 303(d) list determine that Buck Creek is indeed a Category 5 impaired surface water due to human causes rather than natural processes, the City then requests that Ecology incorporate the ASR project under development and not delay authorization until a TMDL study is completed. The City believes this request is reasonable given that diversions under the ASR project would be limited to wintertime flows and would result in reduced diversions during critical summer flow periods, benefiting instream flow and temperature conditions in the creek.

The City also has concerns with listing of the lower White Salmon River as impaired for temperature. This proposed listing is based on temperature exceedances from data collected in 2009 and 2010. These data were collected while Condit Dam was in place upstream of the reach proposed for listing, creating the Northwestern Lake impoundment. Condit Dam was removed in October 2011, and the river is now free-flowing through the former Northwestern Lake. The data indicating temperature exceedances downstream of the former Condit Dam do not reflect current conditions and which have undoubtedly improved, and designation of this reach as impaired for temperature should be rejected.

The City appreciates Ecology's consideration of these comments and requests and looks forward to a response. Given Ecology's investment in the ASR project, we suggest that a meeting with the City, Ecology Water Quality, and Ecology OCR would be helpful in working through these issues.


Mayor David Poucher
City of White Salmon

cc: Derek Sandison, Director, Office of Columbia River

² Water year 2001 extends from October 1, 2000 through September 30, 2001.