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Subject: Clark County comments 2015
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Attachments: [Clark Co comment submittal 2015.xlsx](#)

The attached file contains comments on specific proposed 2015 303(d) Category 5 listings for Clark County. We only commented on new or modified listings.

The attached table includes data downloaded from the 303(d) database along with our comments.

It appears that Ecology has modified a number of listings from Category 3 “uncertain due to lack of data” to Category 5 “needs a TMDL”, without using additional data. Perhaps it is more appropriate to include these as Category 2 “waters of concern” listings rather than leaving as Category 3 or moving to Category 5.

In some cases, such as tributaries to Salmon Creek and Gibbons Creek, new segments are listed for bacteria. These basins already have clean-up plans. Shouldn’t such listings be category 4?

Bacteria listings for Gee Creek appear to use the exceptional water body standard instead of the contact recreation standard. Perhaps this is an oversight due to Gee Creek discharging to Lake River, which is actually a river, not a lake, tributary to the Columbia River.

Temperature listings for very rare departures from the standard in forested basins should be considered for listing as waters that are impaired due to natural conditions or waters of concern. Jones Creek is a good example. It is a forested drinking water source area largely controlled by the City of Camas where the Oregon Water Quality Index is excellent and the BIBI is in the mid-forties.

Is it possible to identify forest areas under forest management plans to protect stream habitat for Salmon as Category 4 listings?

Several listings use data over ten years old and in some cases over 20 years old, raising the question of whether these are valid Category 5 listings.

In some cases where Ecology has conducted studies in recent years, such as Salmon Creek and Lacamas Lake watershed, this more recent data does not appear to have been considered.

The use of BIBI scores as a listing criterion causes concern that Ecology is moving to surrogates for pollutants in listings and TMDLs. Biologic assessments are a key element for describing stream habitat quality but are not a pollutant and cannot be converted into a load allocation for a pollutant. The use of BIBI scores should be limited to areas such as 305(b) reporting and listing waterbodies as a concern in Category 2.

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