

From: [Jeremy Jenkins](#)
To: [ECY RE 303d](#)
Subject: Comment on Listing ID 17484 - PCBs in Liberty Lake (AU: 17010305000436)
Date: Friday, May 15, 2015 10:51:47 PM

May 15, 2015

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

Re: Comment on Listing ID 17484 - PCBs in Liberty Lake (AU: 17010305000436)

Dear Mr. Lizon,

Please accept this letter regarding the proposed Category 5 listing on Liberty Lake, Spokane County, for PCBs in the Draft 303(d) Freshwater Assessment.

Liberty Lake Sewer and Water District (LLSWD) has actively monitored and managed the Liberty Lake watershed for nutrients, nonpoint source runoff, and general lake health since 1964. During this history with the lake, some significant events took place regarding the fish population of Liberty Lake. In 1940, according to information obtained from the files of the Washington Department of Fish and Wildlife (WDFW), the original species of fish found in Liberty Lake were Whitefish and Cutthroat Trout. During the 1940's WDFW stocked the lake with Largemouth Bass and Carp. These stocking efforts were followed closely with Perch, two species of Sunfish, Smallmouth Bass, Crappie, and Bullhead. Later in 1951, according to WDFW, all of the stocked fish had reproduced to the extent that overcrowding and dwarfing made them generally undesirable to anglers. WDFW made the decision to Rotenone the lake in 1951 and restock with Trout. Later in 1965, WDFW decided to Toxaphene the lake and restock the following year with Trout. Again, in 1974, the lake was treated with Rotenone by WDFW. In 1983, it was announced that Liberty Lake would again be treated with Rotenone. The treatment was stopped in 1984 and Liberty Lake has yet to be treated with Rotenone.

This history includes many restarts of the Liberty Lake fishery, 3 to be exact. All followed by a complete refill of hatchery-raised fish. WDFW continues with an annual stocking program of more than 20,000 fish to Liberty Lake.

In a 2006 report by Ecology looking at pre-release Rainbow Trout (a commonly stocked fish in Liberty Lake), it found that fish tissue sample concentrations varied widely, both above and below the human health criteria for PCBs, in sampled hatchery fish. Many other studies of regional hatchery facilities also show high variability in test results of fish tissue.

Given the vast numbers of hatchery grown and fed fish, put into Liberty Lake over the years, WDFW and Ecology should consider assessing the most probable source of PCBs into Liberty Lake and other similar bodies of water, the annually introduced fish population

which becomes part of a living and vibrant food web causing bioaccumulation of more PCBs.

Furthermore, this 2006 report recommended that Ecology consider looking at hatchery fish as a possible point source of PCBs into 303(d) listed waters when other point sources were not present. This is the case at Liberty Lake.

“One of the implications of these results, particularly from the practical standpoint of a regulatory agency, is that waterbodies may be included on the 303(d) list due to contamination stemming from hatcheries. Taken further, 303(d) listed waters often require a TMDL to assess contaminant sources. Sources considered for TMDLs are typically point sources (e.g., piped effluent, stormwater outfalls) and nonpoint sources (e.g., agricultural and urban runoff, atmospheric deposition) which normally occur in the vicinity of the impaired waterbody. However, no known TMDLs in Washington have included hatchery fish as a contaminant source. For PCBs, and to a lesser extent dieldrin, hatchery fish may contribute to impairment and, in some cases, may cause the bulk of impairment. Therefore, TMDL investigators may want to consider including hatchery fish as contaminant sources among other sources.”
(Ecology, 2006 (30))

One other variable that Ecology should more thoroughly consider before listing Liberty Lake as a Category 5 for PCBs, is the extremely small sample size this waterbody listing is based on, 3 fish. These 3 fish cannot be representative of the entire fish population of Liberty Lake, not the 3's respective species, and most certainly not the entire 716 Acre waterbody. Based on Ecology's own SOP for this listing process, this sample is not credible, and therefore not enough to support a 303(d) listing.

“Data are considered credible if:

-The samples or measurements are representative of water quality conditions at the time the data were collected” (WQP Policy 1-11, Ch.2 (3)(rev.2006))

The proposed Category 5 listing ID 17484, should be reconsidered until Ecology provides a more complete picture of the PCB dynamics in and out of the Liberty Lake watershed before triggering a full-blown TMDL. A significant component of this dynamic has been largely ignored, a fact we all agree on.

Please feel free to contact me with any questions you may have.

Sincerely,

Jeremy Jenkins

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