

Attachment A: Listing ID Specific Comment on the 2015 Draft Proposed Assessment and 303(d) List

Listing ID	Waterbody Name	Proposed Category	Parameter	Comment
3756	SNOHOMISH RIVER	5	Bacteria	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 25 year old data.
7238	JORGENSON SLOUGH (CHURCH CREEK)	5	Dissolved Oxygen	Review listing and place in more appropriate Category such as 2 or 3. ECY's Remark indicates that the referenced data for DO is not in the administrative record. The segment listed as Category 5 is based on the 1998 assessment.
7273	FRENCH CREEK	5	pH	Remove Thornburgh et. al. data and Change to Category 1. Quality assurance and control procedures not known or verified in Thornburgh et. al. pH measurements not taken insitu. No other data from ECY studies showed excursions.
7276	FRENCH CREEK	5	Dissolved Oxygen	Remove Thornburgh et. al. data and Change to Category 1. Quality assurance and control procedures not known or verified in Thornburgh et. al. pH measurements not taken insitu. No other data from ECY studies showed excursions.
7282	FRENCH CREEK	5	pH	Remove Thornburgh et. al. data and Change to Category 1. Quality assurance and control procedures not known or verified in Thornburgh et. al. pH measurements not taken insitu. No other data from ECY studies showed excursions.
7291	PILCHUCK RIVER	5	pH	Remove Thornburgh et. al. data and Change to Category 1, 2 or 3. Quality assurance and control procedures not known or verified in Thornburgh et. al. pH measurements not taken insitu. No other data from ECY studies showed excursions. Analysis of 128 measurements showed only 6 excursions which represents only a 1% probability of true impairment.
7294	PILCHUCK RIVER	5	pH	Remove Thornburgh et. al. data and Change to Category 1. Quality assurance and control procedures not known or verified in Thornburgh et. al. pH measurements not taken insitu. No other data from ECY studies showed excursions.
7299	QUILCEDA CREEK, W.F.	5	Dissolved Oxygen	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 14 year old data. Quality assurance and control procedures not known or verified.
7312	SNOHOMISH RIVER	5	Temperature	Change to Category 1 or 2. Probability of true impairment very low. Analysis of data shows a 4% probability of impairment based on 118 measurements with 7 excursions.
7400	DUBUQUE CREEK	5	Dissolved Oxygen	Change to Category 1 or 2. Probability of true impairment very low. The data relied on shows approximately 140 DO measurements and 7 excursions. Analysis of data shows a 1% probability that greater than 10% of samples exceed the criteria.
7435	WALLACE RIVER	5	Temperature	Review listing and place in more appropriate Category such as 2 or 3. Listing based on pre-1999 data. Additionally, ECY needs to disclose % of excursions WDFW found per year at inflow to Hatchery. Can't make determination of impairment with the data provided.
7450	NORMA CREEK	5	Bacteria	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 20 year old data.
7463	SWAMP CREEK	5	Dissolved Oxygen	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 224 measurements and 21 excursions represents only a 34% probability of true impairment. 2009 had 99% probability of impairment, but it was an extremely hot year which likely resulted in more excursions during spring and summer.
7466	SWAMP CREEK	5	Temperature	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 158 measurements and 8 excursions represents only a 0.84% probability of true impairment.
8638	PORTAGE CREEK	5	Turbidity	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 25 year old data.
8639	PORTAGE CREEK	5	Turbidity	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 25 year old data.
9273	FRENCH CREEK	5	Temperature	Disclose % of excursions found by year. Can't determine annual or overall conformance to WQP 1-11, but likely high probability of impairment.

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9296	SKYKOMISH RIVER	5	Dissolved Oxygen	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 114 measurements and 3 excursions represents only a 0.05% probability of true impairment. 2009 only year in eight which had > 10% of samples exceed criterion - representing only a 38% probability of impairment.
10621	PILCHUCK RIVER	5	Dissolved Oxygen	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 141 measurements and 6 excursions represents only a 0.37% probability of true impairment. 2009 - 3 of 12 samples exceeded criterion - worst year of 14. Represents 88% probability of impairment for only that year.
12681	MCALEER CREEK	5	Dissolved Oxygen	Change to Category 1 or 2. Probability of true impairment very low. Listing based upon 17 year old data. King County data does not disclose the % of samples in each year that exceeded the criterion. Excluding King County data, 63 total measurements and 4 excursions represents only a 13% probability of true impairment. 2005-2008 (last years of data available) all met criteria. 2004 most recent year to exceed criterion.
13122	LYON CREEK	5	Bacteria	Remove listing. Listing basis indicates that E.coli data can be used to infer exceedences of the fecal coliform standard. This is an improper change of standards through policy and/or the improper use of a proxy.
14726	WOODS CREEK, W.F.	5	Dissolved Oxygen	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 137 measurements and 5 excursions represents only a 0.15% probability of true impairment. 2004 had most excursions 3 of 11 representing a 91% probability of impairment for that year only.
17494	SWIFTY (FERGUSON) CREEK	5	Dissolved Oxygen	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Friends of Blackmans Lake Volunteer data.
17495	SWIFTY (FERGUSON) CREEK	5	Temperature	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Friends of Blackmans Lake Volunteer data.
35163	BEAR CREEK	5	Temperature	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Port Blakely Tree farm data.
35166	BEAVER CREEK	5	Temperature	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Port Blakely Tree farm data.
35167	OLNEY CREEK	5	Temperature	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Port Blakely Tree farm data.
35168	UNNAMED CREEK (TRIB TO OLNEY CREEK)	5	Temperature	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Port Blakely Tree farm data.
35297	PEKOLA CREEK	5	Temperature	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Port Blakely Tree farm data.
40743	FRENCH CREEK	5	Dissolved Oxygen	Change to Category 1 or 2. Probability of true impairment very low. Listing basis for use of 1998-2002 Snohomish County data does not disclose the % of samples in each year that exceeded the criterion. Excluding 1998 - 2002, 51 total measurements and 5 excursions represents a 41% probability of true impairment.
40748	FRENCH CREEK	5	pH	Change to Category 1 or 2. Probability of true impairment very low. Listing basis for use of 1998-2002 Snohomish County data does not disclose the % of samples in each year that exceeded the criterion. Excluding 1998 - 2002, only 4 of 51 results exceeded criteria resulting in 23% probability of impairment. Basis appears to have errantly included sample results for French Creek Lower (FCLD) in the same segment as for French Creek Upper (FCLU) and contributes to listing as Cat 5. Revisit NHD reach and location of FCLD.
40785	LITTLE BEAR CREEK	5	Dissolved Oxygen	Change to Category 1 or 2. Probability of true impairment very low. Listing basis for use of 2001 Snohomish County data does not disclose the % of samples that exceeded the criterion. Excluding this year, 80 total measurements and 7 excursions represents a 34% probability of true impairment. 2008 and 2009 only known years with > 10% of measurements exceeding criteria with 2 of 12 exceeding or 65% probability of impairment.

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40791	NORTH CREEK	5	pH	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 81 measurements and 3 excursions represents only a 1% probability of true impairment. 2004 - 2 of 11 samples exceeded criterion - worst year of 8. Represents 69% probability of impairment for only that year.
40805	SWAMP CREEK	5	pH	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 86 measurements and 3 excursions represents only a 0.68% probability of true impairment.
40817	LITTLE PILCHUCK CREEK	5	pH	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 117 measurements and 10 excursions represents only a 25% probability of true impairment. Half of the results used for determination are > 13 years old.
40878	LITTLE BEAR CREEK	5	Temperature	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 1886 measurements and 93 excursions represents a 0% probability of true impairment.
40901	CHURCH CREEK	5	pH	Change to Category 1 or 2. Probability of true impairment very low. All data considered = approximately 172 measurements and 3 excursions (all in 2006 - suspect data?) represents only a 0.0002% probability of true impairment.
40930	CATHERINE CREEK	5	pH	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 134 measurements and 5 excursions represents only a 0.19% probability of true impairment.
47423	SORGENFREI CREEK	5	Dissolved Oxygen	Review listing and place in more appropriate Category such as 1, 2, or 3. Probability of true impairment very low. Last data used to support listing collected in 2002 - now 13 years old.
47439	UNNAMED CREEK (TRIB TO SKYKOMISH RIVER)	5	Dissolved Oxygen	Review listing and place in more appropriate Category such as 1, 2, or 3. Probability of true impairment very low. Listing based upon 13 year old data.
47441	UNNAMED CREEK (TRIB TO PILCHUCK RIVER)	5	Dissolved Oxygen	Review listing and place in more appropriate Category such as 1, 2, or 3. Probability of true impairment very low. Listing based upon 13 year old data.
47492	UNNAMED CREEK (TRIB TO QUILCEDA CREEK)	5	Dissolved Oxygen	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in Snohomish County Planning and Development Services study under ECY grant. Listing based upon 13 year old data.
47969	HOWELL CREEK	5	Dissolved Oxygen	Change to Category 1 or 2. Probability of true impairment very low. Only 53% chance of true impairment
50735	KISSEE CREEK	5	pH	Review listing and place in more appropriate Category such as 2 or 3. Listing based upon 13 year old data.
70119	SWAMP CREEK	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.
70134	MCALEER CREEK	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.

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70135	LYON CREEK	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.
70200	LITTLE BEAR CREEK	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.
70202	NORTH CREEK	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.
70217	LITTLE PILCHUCK CREEK	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.
70220	NORTH CREEK	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.
70224	PICNIC CREEK	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.

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70236	SCRIBER CREEK	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.
70238	SILVER CREEK	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.
70242	UNNAMED CREEK (TRIB TO SCRIBER CREEK)	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.
70251	GLADE BEKKEN (TRIB 30)	5	Bioassessment	Remove listing or at a minimum change to Category 4c. The numeric standard established by ECY to support Category 5 listing was created outside of required legal and administrative processes and is a standard contrary to that established in WQP 1-11. Listing methods and thresholds for impairment are ambiguous and lack transparent scientific justification. Ecology has not identified and made available the sources of information relied upon. Additionally, the Category 5 listing is not associated with a pollutant. WQP 1-11 states that when a source of impairment is unidentified but is suspected to be from "pollution" instead of a "pollutant" the segment must be placed in Category 4c.
71228	UNNAMED CREEK (TRIB TO FRENCH CREEK)	5	pH	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 36 measurements and 3 excursions represents only a 33% probability of true impairment.
71237	UNNAMED CREEK (TRIB TO COTTAGE LAKE)	5	pH	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 52 measurements and 3 excursions represents only a 9% probability of true impairment. Only one year (2006) of 5 had > 10% of measurements exceeding criteria.
72252	HALL CREEK	5	Bacteria	Change Remark. Remark incorrectly refers to use of 2007 exceedences of geometric mean and % criterion when only 1 sample was available - WQP requires > 2 samples.
72516	SAUK RIVER	5	Temperature	Change to Category 3. Insufficient sample numbers to make a determination. Only one 7DadMax in 2005 used to support listing.
72567	PILCHUCK RIVER	5	Temperature	Change to Category 3. Insufficient sample numbers to make a determination. One 7DadMax in 2006 used to support listing.
73890	RILEY SLOUGH	5	Temperature	Change to Category 1 or 2. Probability of true impairment very low. All data considered = 26 measurements and 3 excursions represents only a 51% probability of true impairment.
74192	SWIFTY (FERGUSON) CREEK	5	Bacteria	Change Remark. Remark incorrectly refers to use of 2009 exceedences of geometric mean and % criterion when only 1 sample was available - WQP requires > 2 samples.

Listing ID	Waterbody Name	Proposed Category	Parameter	Comment
74323	CEMETERY CREEK	5	Bacteria	Change Remark. Remark incorrectly refers to use of 2009 exceedences of geometric mean and % criterion when only 1 sample was available - WQP requires > 2 samples.
78019	JIM CREEK	5	Dissolved Oxygen	Review listing and place in more appropriate Category such as 2 or 3. Probability of impairment very low. 2008 USGS data showed no excursions. 2001 USGS data 4 of 5 samples exceeded criterion. Listing based upon 14 year old data.
78031	NORTH CREEK	5	Dissolved Oxygen	Verify credibility of data used and place in more appropriate Category such as 2 or 3. Quality assurance and control procedures not known or verified in USGS external data source.