

Comments to Ecology re: draft Water Quality Assessment of Clallam County Bioassessment Data – May 2015

Data completeness evaluation: One sample which was submitted seems to be missing: Pysht 9.5, Location ID CCWR_00667, 9/18/2010. Inclusion/exclusion of samples collected in the years 2000-2006 is not consistent within the draft WQA; for example, Bear (Sol Duc) 5.1 visit IDs 1293 and 7241 taken in 2002 and 2006 are not in the draft WQA, although 2000 and 2001 results for this location are. Similar situation with Ennis 1.4 visit ID 4929, Jimmycomelately 0.2 and 0.6 visit IDs 1286 and 1287, Lees 0.8 visit IDs 57, 240, and 1311, Morse 1.5 and 5.6a visit IDs 6093 and 7226, Salt 4.2 visit IDs 4906 and 7216, Siebert 0.6 visit IDs 4910, 6121, and 7218, and Valley 0.4 and 2.2 visit IDs 48, 50 and 249.

Stream segmentation: Only a partial comparison of the NHD reach codes in Clallam County's GIS was done with those in the draft WQA (10 cases out of more than 45). Some inconsistencies were found: Ennis 2.2 (WQA listing ID 70044) is listed with a reach code ending in 0000113 in Clallam's GIS, but in the WQA is listed as reach code ending in 0012961; Jimmycomelately 0.8 (WQA listing ID 40668) is listed as reach code 0005329 in Clallam's GIS but in the WQA as reach code 0000372. Some kind of reconciliation is needed between Clallam's and WQA's NHD codes.

Archaic remarks: The public remarks (in quotes below) for Ennis 0.1 (WQA listing ID 42902) appear dated and potentially misleading. The 2012 and 2008 categories are listed in the WQA as 5 and the proposed category is also listed as 5. (There may be other similar archaic remarks connected to other listings, but we have not had time to review them all.)

"Policy 1-11 requires that there be more than one year of concurring data within the last 5 years to make a category determination for a reach. Data for this reach reflected a range of conditions. Fewer than 2 years of data over the last 5 years showed consistent data representing Category 5 impairment (B-IBI Score <27/RIVPACS score <0.73) at any given site within this reach. New data is insufficient data to change the current listing.

This listing was previously placed on Category 4C for biological data in accordance with Policy 1-11. The listing has been moved to Category 2 based on recommendations from EPA, since the data is insufficient to determine if the biological impairment is from a pollutant or pollution. Additional monitoring needs to occur before the sources of impairment can be identified."

Scoring breaks for WQA categories: The draft WQA thresholds for the different categories differ from those recommended by Clallam County and accepted by Ecology in prior assessments. Clallam County's recommendations and citations for such are presented here:

http://www.clallam.net/streamkeepers/html/revised_b-ibi_grading_system.htm. If Ecology has provided equivalent documentation for its scoring breaks, this reviewer has not seen it.

Category	SK	WQA/DOE	Description
1	>= 46	>= 38	Meets standards
2	Between 36 and 44	Between 28 and 37	Of concern
3	--	--	Insufficient data
5	<=34	<=27	Impaired