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**DEPARTMENT OF RESOURCE STEWARDSHIP
WATER RESOURCES DIVISION**

Creating Solutions for Our Future

Scott Clark
Director

May 12, 2015

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

RE: Thurston County General and Specific Comments for 2015 Proposed Water Quality Assessment and 303(d) List for Washington State Using Fresh Water Data

Dear Mr. Lizon:

Thank you for the opportunity to provide comments on the "2015 Proposed Water Quality Assessment and 303(d) List for Washington State Using Fresh Water Data", hereafter referred to as "WQA".

Thurston County has reviewed the database and has found several areas where revisions may be necessary. We have summarized general programmatic and process concerns in the narrative that follows. In addition, we included our comments related to specific assessment listings in Table 1 (Specific Comments on Listings in the Proposed Draft Assessment) below.

Once again, we very much appreciate the opportunity to review the proposed listings and suggest corrections; thereby making this very helpful and important tool a great resource for the Department of Ecology, Thurston County, and other interested parties.

Please feel free to contact me by email at bensonh@co.thurston.wa.us or by phone at 360.867.2075 if you need any additional information.

Sincerely,

Heather Saunders Benson
Utility Planner, Water Resources
Thurston County Department of Resource Stewardship

Cc: Jim Bachmeier, Water Resources Manager
Scott Clark, Director of Resource Stewardship

Water Resources Management
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**Thurston County Comments on
2015 Proposed Water Quality Assessment and 303(d) List for Washington State Using Fresh Water Data
Submitted to the Washington State Department of Ecology May 2015**

Proposed Draft Assessment Database

- 1. Comment:** In most instances, in the *Main Listing Information* section, there was no “designated use” assigned to the listing. It is our understanding that a waterbody’s listing is based on attainment or non-attainment of the water quality standards established for a designated use; therefore, it cannot be listed if there is no designated use. We learned in conversations with Ecology staff that this field simply wasn’t populated and that designated uses are associated with each listing exist. This makes it very difficult for the reviewers to verify listings and/or to provide any necessary feedback or corrections. We recommend populating this field for future assessments. The designated use is essential to provide context for the impairment and an associated corrective action.
- 2. Comment:** In the map feature, we recommend including an overlay map in the background that depicts whether a Water Quality Improvement Plan (WQIP) or Total Maximum Daily Load (TMDL) (draft and/or approved) exists for a proposed listing. This would allow the user to quickly determine if a water quality improvement plan or TMDL already exists to address the impairment, if one is being drafted, or if there is an error in the listing (i.e. should be moved to Category 4A).
- 3. Comment:** At the public meeting in Lacey on April 9, 2015, Ecology noted that all listings with a list identification number over 70,000 represent new listings. However, all of the river/stream Thurston County listings for “water quality” above that number, except for one, reference a change from Category 3 to Category 5, rather than a brand new listing. This includes Listing ID’s 71048, 71057, 71058, 71066, 72268, 72637, 72638, 73229, 73660, 73667, 74217, 74219, 74220, 74242, 74252, 74416, 74643, 74783, 74814, 74848, 74850, 74968, 78074, and 78075. We request clarification in WQA Policy 1-11 regarding what amount of data (and the protocols followed for data collection) is required to place a segment in Category 3, rather than not having a listing at all. For example, are all waterbodies considered to be Category 3 even if no monitoring has been conducted?

Assessment Method, Procedures, and Policy

- 4. Comment:** There are many instances in which the terms “bacteria”, “fecal coliform bacteria”, and/or “fecal coliform” are interchanged. In addition, in many cases, the impairments are listed for “bacteria”, but the WQIPs and TMDLs are developed for “fecal coliform” or “fecal coliform bacteria”. We recommend moving towards consistency with listing protocols and terminology in this regard.
- 5. Comment:** Several TMDLs or WQIPs in Thurston County have titles which include multiple parameters; however, the reports may only include loading allocations for one or two parameters. Examples for Thurston County include the following

- [Nisqually River Basin Fecal Coliform Bacteria and Dissolved Oxygen Total Maximum Daily Load: Water Quality Implementation Plan](#). This TMDL includes loading allocations for fecal coliform bacteria (Appendix D) and a narrative of best management practices for dissolved oxygen. Therefore it is unclear if dissolved oxygen is covered under this TMDL.
- [Henderson Inlet Watershed Fecal Coliform Bacteria, Dissolved Oxygen, pH, and Temperature Total Maximum Daily Load Study](#); [Henderson Inlet Watershed Fecal Coliform Bacteria, Dissolved Oxygen, and pH Total Maximum Daily Load Study: Water Quality Improvement Report Implementation Strategy](#) (*note*: temperature was dropped from this title); [Henderson Inlet Watershed FC Bacteria TMDL-Water Quality Implementation Plan](#) (*note*: everything but fecal coliform bacteria was dropped from this title).
- [Tributaries to Totten, Eld and Little Skookum Inlets Fecal Coliform Bacteria and Temperature Total Maximum Daily Load: Water Quality Implementation Plan \(final\)](#). There are only loading allocations for fecal coliform bacteria provided.

Furthermore, it is unclear if a TMDL must provide loading allocations for a given parameter in order for that parameter to be considered as having a TMDL. In some cases, the WQIP or TMDL may list out Best Management Practices (BMPs) or recommendations in lieu of loading allocations. For example, in the [Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load \(Water Cleanup Plan\)](#), loading allocations are provided for fecal coliform bacteria, but dissolved oxygen is only discussed and addressed in a narrative format. To further complicate the issue, Ecology itself seems unclear about how to apply TMDLs to the listings. In this most recent proposed assessment, Ecology has proposed to move some (but not all) segment listings from Category 5 to 4A based on an inclusion in a Multiparameter TMDL, even if no loading allocations for that parameter have been provided.

An example is provided in the Henderson Inlet watershed. Ecology has proposed moving 3 freshwater listings for pH in Thurston County (40615, 51449, and 72064) to Category 4A based on their inclusion in the “Henderson Inlet Multiparameter TMDL” (this is what is listed in the listing). Yet it is unclear which of the several reports listed above for Henderson Inlet is considered the actual TMDL, and none of the reports provides loading allocations for pH. The [webpage](#) is titled “Henderson Inlet Watershed Area: Fecal Coliform Bacteria” which further confounds the issue.

This makes it extremely difficult for regulated communities to discern which parameters Ecology considers covered under any given TMDL or WQIP. In follow-up conversations with Ecology staff, conflicting information is provided. For example, the County has been told in the past that a loading allocation is required for a parameter to be considered covered, but this information is inconsistent with the proposed listings provided as an example above.

We strongly recommend updating the TMDL/WQIP websites, document titles, and database information to specify which parameters are considered to be included under the TMDL or WQIP. In addition, we recommend the development of a consistent methodology and policy for applying TMDL coverage to listings (e.g. is a loading allocation required to be determined as having a TMDL or are

narrative recommendations sufficient in some cases?). WQA Policy 1-11 should be updated to include this information.

6. **Comment:** It is not always clear what segments are included in the geographic scope of a TMDL or WQIP. Many segments were not specifically addressed during the development of a TMDL or WQIP because data was not available to make a determination about their water quality. With more data available, new listings are popping up in areas where TMDLs or WQIP have already been established. In these cases, it is not always easy to discern if Ecology considers a segment to be included in the geographic scope of an existing TMDL or WQIP. As with Comment 2, we recommend including an overlay map in the listing database that depicts the applicability of TMDLs or WQIP for any given listing.
7. **Comment:** It would be helpful to update the WQP Policy 1-11 to include a narrative explaining the new use of the United States Geological Survey (USGS) National Hydrography Dataset (NHD) as the basis for delineating reaches. This narrative should include instructions for making any needed corrections to the NHD layer. For example, ground-truthing may reveal that a stream does or does not exist. At the public meeting in Lacey on April 9, 2015, Ecology referred to themselves as the “stewards” of the data, but it’s not clear if we should approach Ecology or the USGS to correct this type of data error. We recommend developing a standardized methodology and process for making corrections to the NHD layer to be included in WQP Policy 1-11. A point of contact should also be provided.
8. **Comment:** Refer to Category 4C. Segment is Impaired by a Non-Pollutant, Page 17, Paragraph 4, *“Some designated uses of a waterbody segment may be impaired due to aquatic habitat degradation that does not cause an exceedance of a pollutant criterion. When data show that a waterbody segment is impaired for such reasons, it will be placed in the Impaired by a Non-Pollutant category.”* Please also refer to b. Bioassessment, Category 4 Determination, Page 33, Paragraph 1, *“Placement of a waterbody segment in Category 4c for either RIVPACS or the B-IBI will be based on impairment data and information that show the condition is likely not the result of pollutant sources bur rather from other factors as defined in the section explaining category 4c.”*

It appears that some intermediate step is warranted here. In the public meeting in Lacey on April 9, 2015, Ecology indicated that it had used bioassessments to list waterbodies since 2004, but in these cases it is not clear if a causal pollutant was identified. At this meeting, there was discussion that the next step for a bioassessment listed segment would involve conducting a pollutant stressor identification study to determine if a specific causal pollutant can be identified.

Thurston County does not consider it appropriate to list a waterbody in Category 5 based on an indicator rather than a pollutant. Rather, bioassessment should be regarded as a screening tool with which we may identify potential water quality impairments. An impaired bioassessment listing may trigger a stressor identification assessment. If additional monitoring during a stressor identification assessment identifies an impaired parameter for which we have established numeric water quality criteria, then it would be appropriate to list that waterbody based on that parameter and develop a

TMDL accordingly. If pollution or habitat degradation is determined as the cause, the segment would be placed in Category 4C. Alternatively, a stressor identification study (during which reference conditions should be adequately established) may indicate that the biological community is consistent with natural conditions for that reach (acknowledging that different waterbodies inherently exhibit different water quality conditions and biotic communities).

Therefore, we recommended the following listing policies associated with bioassessments.

- a) In instances where a causal pollutant has **not** been identified for a bioassessment-listed impairment, we recommend placing the listing in Category 2 (Water of Concern). WQA Policy 1-11 should be updated to include recommendations on follow-up actions that should be taken to identify the pollutant stressor(s).
 - b) Subsequent to the stressor identification study, and/or in instances where there is a bioassessment impairment **and** enough information to show the “condition is likely not the result of pollutant sources”, we recommend the listing be placed in Category 4c (as currently articulated in WQA Policy 1-11).
 - c) We recommend that Category 5 should only be used for listings where a causal pollutant has been identified. (Ecology’s current policy on using Category 5 for bio-assessments (pg. 33) appears inconsistent with its on policy for categorization (pg. 18), which states that “waterbody segments impaired by a *pollutant*...will be placed in Category 5.”)
 - d) We recommend updating WQA Policy 1-11 to be more consistent with the recommendations provided above.
9. The current WQA Policy 1-11 indicates that Ecology applies narrative standards for bio-assessment, but what those narrative criteria are is not explicitly described in the policy or in WAC 173-201A -260 and 300. In addition, the required data collection methods and process for assessment listings are unclear. Ecology states a preference for data to be “collected in accordance with Standard Operating Procedures ([SOP](#)) #EAP073, but may also accept data collected using other protocols. It then states that after 2012, all biological data submitted for review must be collected using the field and data reporting protocols outlined in the SOP for collecting freshwater macroinvertebrates. This verbiage is conflictual and it is not clear if only data collected with the SOP will be allowed after 2012 or if another collection method would be considered. In addition, “may also accept data collected using other protocols” does not provide enough clarity to make informed monitoring decisions. We recommend updating the WQA Policy 1-11 language to clarify Ecology’s meaning and to explicitly define what data collection methods are suitable.

We further recommend that Ecology engage EPA and stakeholders in a transparent process to help evaluate and determine these data collection methods and establish credible bioassessment criteria and assessment. Methods of assessment may include a review of category placement or expansion of existing categories to support stressor identification study prior to establishing Category 5 listings, such as has been suggested in previous comments.

Also, please note that the link to [\(SOP\) #EAP073](#) is broken. We recommend updating the link.

- 10.** Chapter 2 of the WQP Policy 1-11 (pg. 1) states that *“Ecology shall use credible data for the following actions: determining whether any water of the state is to be placed on or removed from any section of the 303(d) list...”*. It further states (pg. 3) that this policy includes a *“description of the specific criteria that are used to judge whether data are of adequate credibility to use when (1) determining whether any water of the state is to be placed on or removed from any section 303(d) list...”*. However, no such specific criteria is actually provided in the policy other than circular references to credible data. Furthermore, this language suggests that the same data protocols would be applied to both listing and de-listing; however, in application, Ecology has required more data collection to de-list than to list. We suggest that Ecology revise the policy to require the same level and quality of data collection for both listing and de-listing decisions.

Table 1. Specific Comments on Listings in the Proposed Draft Assessment

Listing ID	Waterbody Names	2012	Proposed	Parameter	Comment
3771	WOODARD CREEK	2	2	Dissolved Oxygen	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in the Henderson Basin for Category 4A including Listing IDs 47737 and 47740 (Woodard Creek), 48058 (Eagle Creek), 48059 (Palm Creek), 48158 (College Creek), and 48061 (Fox Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.
3773	WOODLAND CREEK	2	5	Temperature	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses temperature. Ecology has recommended other reaches with temperature impairments in the Henderson Basin for Category 4A including Listing ID 36180 (Woodland Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.
3774	WOODLAND CREEK	2	2	Dissolved Oxygen	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in the Henderson Basin for Category 4A including Listing IDs 47737 and 47740 (Woodard Creek), 48058 (Eagle Creek), 48059 (Palm Creek), 48158 (College Creek), and 48061 (Fox Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.
6808	YELM CREEK	3	5	Dissolved Oxygen	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended sections of Yelm Creek be moved from Category 3 to 1 (Listing ID 22423); therefore it stands to reason that Yelm Creek is considered to be within the footprint of the Nisqually TMDL. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
7529	MCALLISTER CREEK	2	2	Dissolved Oxygen	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended other segments of McAllister Creek with dissolved oxygen impairments for Category 4A including Listing IDs 78055 and 78057. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for Listing IDs 46177 (Unnamed Creek (Trib to McAllister Creek)), 78055 (McAllister Creek), and 78057 (McAllister Creek). Recommend change to Category 4A.
7532	MCALLISTER CREEK	2	2	Dissolved Oxygen	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended other segments of McAllister Creek with dissolved oxygen impairments for Category 4A including Listing IDs 78055 and 78057. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for Listing IDs 46177 (Unnamed Creek (Trib to McAllister Creek)), 78055 (McAllister Creek), and 78057 (McAllister Creek). Recommend change to Category 4A.
9873	MCALLISTER CREEK	3	2	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
11649	WADDELL CREEK	3	2	Temperature	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.
15522	BEAVER CREEK	2	2	Temperature	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.

16718	NISQUALLY RIVER	2	2	Bacteria	The Nisqually River was a major part of the TMDL study and is referred to often in the TMDL. Furthermore, the Nisqually River was considered as meeting quality standards for fecal coliform bacteria at the monitoring station and not requiring load allocations (pg. 30). Best management practices were recommended for the Nisqually River which presumably would be addressing any water quality concerns. Recommend change to Category 4A.
22332	MONROE CREEK	2	2	Bioassessment	We concur that bioassessment listings should be placed in Category 2. See narrative comments.
22422	YELM CREEK	3	5	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended sections of Yelm Creek be moved from Category 3 to 1 (Listing ID 22423); therefore it stands to reason that Yelm Creek is considered to be within the footprint of the Nisqually TMDL. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
23750	MCLANE CREEK	2	2	Temperature	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which addresses temperature. Ecology has placed other reaches in this watershed for Category 4A including Listing ID 12582 (Perry Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
36184	WOODLAND CREEK	5	5	Temperature	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses temperature. Ecology has recommended other reaches with temperature impairments in the Henderson Basin for Category 4A including Listing ID 36180 (Woodland Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.
36185	WOODLAND CREEK	5	5	Temperature	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses temperature. Ecology has recommended other reaches with temperature impairments in the Henderson Basin for Category 4A including Listing ID 36180 (Woodland Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.
40587	WOODARD CREEK	2	2	pH	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses pH. Ecology has recommended other reaches with pH impairments in the Henderson Basin for Category 4A including Listing IDs 72064 (College Creek), 51449 (Fleming Creek), and 40615 (Sleepy Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.
41118	BEAVER CREEK	2	2	Temperature	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.
41119	ALLEN CREEK	2	2	Temperature	The map shows this listing in the Chehalis Basin in Thurston County, but the identifying information refers to it as in WRIA 7 (Snohomish). Recommend review and correction of listing. If review determines this listing is in the Chehalis Basin, it is part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.
41122	PERRY CREEK	2	2	Temperature	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which addresses temperature. Ecology has placed other reaches in this watershed for Category 4A including Listing ID 12582 (Perry Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.

42376	BURNS CREEK	2	5	Temperature	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for temperature for Burns Creek. Ecology has recommended other reaches with temperature impairments for other watersheds for Category 4A including Listing IDs 77958 (Black River), 11645 (Waddel River), 77959 (Black River), 77965 (Salmon Creek), 77968 (Chehalis River), 77969 (Scatter Creek), 11626 (Beaver Creek), and 77957 (Black River). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists. Recommend change to Category 4A.
45542	UNNAMED CREEK (TRIB TO MCALLISTER CREEK)	2	2	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
45751	UNNAMED CREEK (TRIB TO JORGENSON CREEK)	2	2	Bacteria	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in the Henderson TMDL area for Category 4A. Recommend change category to 4A, as is consistent with the proposed listing for Listing ID 45295 (Palm Creek in Henderson Basin).
45755	GOOSE CREEK	2	2	Bacteria	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in the Henderson TMDL area for Category 4A. Recommend change category to 4A, as is consistent with the proposed listing for Listing ID 45295 (Palm Creek in Henderson Basin).
45760	UNNAMED CREEK (TRIB TO WOODARD CREEK)	2	2	Bacteria	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in the Henderson TMDL area for Category 4A. Recommend change category to 4A, as is consistent with the proposed listing for Listing ID 45295 (Palm Creek in Henderson Basin).
46178	UNNAMED CREEK (TRIB TO MCALLISTER CREEK)	2	2	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
51438	WOODLAND CREEK	2	2	pH	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses pH. Ecology has recommended other reaches with pH impairments in the Henderson Basin for Category 4A including Listing IDs 72064 (College Creek), 51449 (Fleming Creek), and 40615 (Sleepy Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.
70194	DESCHUTES RIVER	3	2	Bioassessment	We concur that bioassessment listings should be placed in Category 2. See narrative comments.
70196	DESCHUTES RIVER	3	2	Bioassessment	We concur that bioassessment listings should be placed in Category 2. See narrative comments.
72101	QUAIL CREEK	3	2	pH	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses pH. Ecology has recommended other reaches with impaired parameters that do not have loading allocations in the Henderson Basin for Category 4A including dissolved oxygen Listing IDs 47737 and 47740 (Woodard Creek), 48058 (Eagle Creek), 48059 (Palm Creek), 48158 (College Creek), and 48061 (Fox Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.
72263	SKOOKUMCHUCK RIVER	3	2	Bacteria	Part of the Upper Chehalis Fecal Coliform Total Maximum Daily Load which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with fecal coliform bacteria impairments in this TMDL study area for Category 4A. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists. Recommend change to Category 4A.

72268	MCALLISTER CREEK	3	5	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
72487	PRAIRIE CREEK	3	2	Bacteria	Potentially part of the Upper Chehalis Fecal Coliform Total Maximum Daily Load which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with impairments in this TMDL study area for Category 4A. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists. Recommend review of location and change to Category 4A, if applicable.
72497	SALMON CREEK	3	2	Bacteria	Part of the Upper Chehalis Fecal Coliform Total Maximum Daily Load which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with impairments in this TMDL study area for Category 4A. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists. Recommend review of location and change to Category 4A, if applicable.
73409	PIERRE CREEK	3	2	Temperature	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which addresses temperature. Ecology has placed other reaches in this watershed for Category 4A including Listing ID 12582 (Perry Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
73976	SKOOKUMCHUCK RIVER	3	2	Temperature	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.
73977	SKOOKUMCHUCK RIVER	3	2	Temperature	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.
73993	SALMON CREEK	3	2	Temperature	Part of the Upper Chehalis Temperature Total Maximum Daily Load which provides loading allocations for temperature (as shade). Ecology has recommended other reaches with temperature impairments in this TMDL study area for Category 4A including Listing IDs 73961 (Black River), 73975 (Skookumchuck River), 72726 (Unnamed Creek (Trib to Salmon Creek)), 73966 (Chehalis River), and 35396 (Unnamed Creek (Trib to Scatter Creek)). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.
74238	UNNAMED CREEK (TRIB TO ELD INLET)	3	2	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
74252	UNNAMED CREEK (TRIB TO ELD INLET)	3	5	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
74300	FIELDS POND	3	2	Bacteria	Could not find this listing on the map feature; therefore was unable to verify if this is or is not within the Nisqually TMDL footprint. Recommend Ecology review and correction of listing if appropriate.

74412	MCALLISTER CREEK	3	2	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
74413	UNNAMED CREEK (TRIB TO MCALLISTER CREEK)	3	2	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
74420	UNNAMED CREEK (TRIB TO MCALLISTER CREEK)	3	2	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
74444	UNNAMED CREEK (TRIB TO MCALLISTER CREEK)	3	2	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
74456	MCALLISTER CREEK	3	2	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
74534	UNNAMED CREEK (TRIB TO ELD INLET)	3	2	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
74535	UNNAMED CREEK (TRIB TO ELD INLET)	3	2	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
74634	KENNEDY CREEK	3	2	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
74635	KENNEDY CREEK	3	2	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.

74643	SCHNEIDER CREEK	3	5	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in this watershed for Category 4A including Listing ID 12583 (Schneider Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
74644	UNNAMED CREEK (TRIB TO KENNEDY CREEK)	3	2	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
74645	UNNAMED CREEK (TRIB TO KENNEDY CREEK)	3	2	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
74700	UNNAMED CREEK (TRIB TO KENNEDY CREEK)	3	2	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A.
74848	UNNAMED DITCH (TRIB TO TOTTEN INLET)	3	5	Bacteria	Part of the Tributaries to Totten, Eld, and Little Skookum Inlets: Fecal Coliform Bacteria and Temperature Total Maximum Daily Load which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments (including Kennedy Creek) in this watershed for Category 4A including Listing ID 12584. This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek in the Nisqually basin)). Recommend change to Category 4A. Note: if this is a marine impairment as noted in the remarks, it should not be included in this assessment (freshwater).
74850	UNNAMED CREEK (TRIB TO NISQUALLY REACH)	3	5	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Nisqually Reach and Drayton Passage are referred to in the existing TMDL. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
74851	UNNAMED CREEK (TRIB TO HENDERSON INLET)	3	2	Bacteria	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in the Henderson TMDL area for Category 4A. Recommend change category to 4A, as is consistent with the proposed listing for Listing ID 45295 (Palm Creek in Henderson Basin).
74968	UNNAMED DRAIN (TRIB TO NISQUALLY REACH/DRAYTON PASSAGE)	3	5	Bacteria	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which provides loading allocations for fecal coliform bacteria. Nisqually Reach and Drayton Passage are referred to in the existing TMDL. Ecology has recommended other reaches with bacteria impairments (including McAllister Creek) in the Nisqually watershed for Category 4A including Listing ID 9874 (McAllister Creek). This is also consistent with Ecology's proposal to change Category 2 or 3 listings to 4A where an applicable TMDL exists such as for Listing ID 46177 (Unnamed Creek (Trib to McAllister Creek)). Recommend change to Category 4A.
74990	UNNAMED DITCH (TRIB TO HENDERSON INLET)	3	2	Bacteria	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which includes loading allocations for fecal coliform bacteria. Ecology has recommended other reaches with bacteria impairments in the Henderson TMDL area for Category 4A. Recommend change category to 4A, as is consistent with the proposed listing for Listing ID 45295 (Palm Creek in Henderson Basin).

77599	SKOOKUMCHUCK RIVER	3	2	Dissolved Oxygen	Part of the Upper Chehalis Dissolved Oxygen Total Maximum Daily Load which provides loading allocations for dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in this TMDL study area for Category 4A including Listing IDs 77958 (Black River), 11645 (Waddel River), 77959 (Black River), 77965 (Salmon Creek), 77968 (Chehalis River), 77969 (Scatter Creek), 11626 (Beaver Creek), and 77957 (Black River). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.
77600	BLOOMS DITCH	3	2	Dissolved Oxygen	Part of the Upper Chehalis Dissolved Oxygen Total Maximum Daily Load which provides loading allocations for dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in this TMDL study area for Category 4A including Listing IDs 77958 (Black River), 11645 (Waddel River), 77959 (Black River), 77965 (Salmon Creek), 77968 (Chehalis River), 77969 (Scatter Creek), 11626 (Beaver Creek), and 77957 (Black River). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.
77612	QUAIL CREEK	3	2	Dissolved Oxygen	Part of Henderson Inlet Watershed Fecal Coliform Bacteria, DO, Temperature, and pH TMDL which addresses dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in the Henderson Basin for Category 4A including Listing IDs 47737 and 47740 (Woodard Creek), 48058 (Eagle Creek), 48059 (Palm Creek), 48158 (College Creek), and 48061 (Fox Creek). This is also consistent with Ecology's proposal to change Category 2 listings to 4A where an applicable TMDL exists such as for Listing ID 45295 (Palm Creek in Henderson Basin). Recommend change to Category 4A.
77752	SKOOKUMCHUCK RIVER	3	2	Dissolved Oxygen	Part of the Upper Chehalis Dissolved Oxygen Total Maximum Daily Load which provides loading allocations for dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in this TMDL study area for Category 4A including Listing IDs 77958 (Black River), 11645 (Waddel River), 77959 (Black River), 77965 (Salmon Creek), 77968 (Chehalis River), 77969 (Scatter Creek), 11626 (Beaver Creek), and 77957 (Black River). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.
77753	SKOOKUMCHUCK RIVER	3	2	Dissolved Oxygen	Part of the Upper Chehalis Dissolved Oxygen Total Maximum Daily Load which provides loading allocations for dissolved oxygen. Ecology has recommended other reaches with dissolved oxygen impairments in this TMDL study area for Category 4A including Listing IDs 77958 (Black River), 11645 (Waddel River), 77959 (Black River), 77965 (Salmon Creek), 77968 (Chehalis River), 77969 (Scatter Creek), 11626 (Beaver Creek), and 77957 (Black River). This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for several of the listings noted above. Recommend change to Category 4A.
77790	MCALLISTER CREEK	3	2	Dissolved Oxygen	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended other segments of McAllister Creek with dissolved oxygen impairments for Category 4A including Listing IDs 78055 and 78057. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for Listing IDs 46177 (Unnamed Creek (Trib to McAllister Creek)), 78055 (McAllister Creek), and 78057 (McAllister Creek). Recommend change to Category 4A.
77791	MCALLISTER CREEK	3	2	Dissolved Oxygen	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended other segments of McAllister Creek with dissolved oxygen impairments for Category 4A including Listing IDs 78055 and 78057. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for Listing IDs 46177 (Unnamed Creek (Trib to McAllister Creek)), 78055 (McAllister Creek), and 78057 (McAllister Creek). Recommend change to Category 4A.
77792	UNNAMED CREEK (TRIB TO MCALLISTER CREEK)	3	2	Dissolved Oxygen	Part of the Nisqually Watershed Bacteria and Dissolved Oxygen Total Maximum Daily Load (Water Cleanup Plan) which addresses dissolved oxygen. Ecology has recommended other segments of McAllister Creek with dissolved oxygen impairments for Category 4A including Listing IDs 78055 and 78057. This is also consistent with Ecology's proposal to change Category 2 and 3 listings to 4A where an applicable TMDL exists such as for Listing IDs 46177 (Unnamed Creek (Trib to McAllister Creek)), 78055 (McAllister Creek), and 78057 (McAllister Creek). Recommend change to Category 4A.