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Patrick Lizon  
Water Quality Program  
Washington Department of Ecology

Sent by email to: 303d@ecy.wa.gov

Subject: Comment on Proposed CWA Section 303(d) listing for ID 6697

The Department proposes a Category 5 listing for ID 6697, Columbia River, bacteria, based on data in "Lower Columbia River Bi-State Water Quality Program: Bacteria Studies," Washington Department of Ecology publication #93-28, Hallock and Ehinger, April 1993.

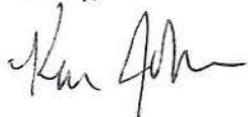
The data in this report, when reviewed against WAC 173-201A and coupled with listing criteria in WQP Policy 1-11, do not support a conclusion of a water quality standards violation or a Category 5 listing. Here's why:

- 1) The water body segment is the Columbia River from the mouth of the Cowlitz River downstream to a demarcation line adjacent to Willow Grove Park. The sampling stations from the Hallock/Ehinger report are identified as "Marker 13 (river mile 63.1)" and perhaps "Jones Beach (river mile 46.1)". The geometric mean of the 15 fecal bacteria data values from the Marker 13 station was well below 100 colonies/100 ml. Only one value was above 200 colonies/100 ml. These data indicate compliance with the WAC 173-201A water quality standard for the "Primary Contact Recreation" use in this section of the Columbia. The data from Jones Beach at river mile 46.1 also evidences water quality standards attainment. The "Conclusions and Recommendations" narrative in the report supports this analysis. The same conclusions are evident with the more limited enterococcus data.
- 2) The data from Marker 13 and Jones Beach similarly fall short of supporting Category 5 listing per WQP Policy 1-11 criteria.

This waterbody segment/pollutant listing should be moved to Category 2 or just removed from the 303(d) list. The only bacteria data the Department can produce is 20+ year old. It really says nothing about contemporary bacteria concentrations in the Columbia River. I appreciate

WQP Policy 1-11 allows for use of ancient data but, in retrospect, this Category 5 listing should never have been made.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Johnson". The signature is fluid and cursive, with a prominent initial "K" and a long, sweeping tail.

Ken Johnson  
Corporate Environmental Manager