



December 17, 2010

Ms. Becca Conklin  
Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

Re: Comments on the Triennial Review of WA's Water Quality Standards (WAC 173-201A)

Dear Ms. Conklin,

Thank you for the opportunity to participate in the Triennial Review of Washington's Water Quality Standards (WAC 173-201A). We remain concerned with the listing of the "Longview Ditches" (referred to in this letter as the Ditches).

*System Description*

The City of Longview is surrounded by a man-made and actively-maintained system of levees, ditches, and pumps. They were built to manage groundwater and stormwater and to defend the city from the Cowlitz and Columbia Rivers. River elevations often exceed ground elevations behind the dikes, and groundwater is widely found at or just below the surface.

Except during a storm, when urban runoff dominates, the ditches are fed exclusively by oxygen-deficient, iron-rich groundwater. The pumps run year-round, so the residence time of stormwater in the system is typically measured in minutes and hours.

*Action Requested*

The City requests a reassessment of the ditches per WQP Policy 1-11 (Section 7: Other Assessment Considerations, p.18 "Listing Challenges and Other Situations"). Specifically, we request the ditches be added to Table 602 of WAC 173-201A-602 and as having the lowest use designation of each category. We ask that this be done using common sense – not complicated academic studies that are so cost prohibitive that they have little or no precedent to date.

*Common Sense Basis for Request*

- Aquatic Life Uses. Salmon and fishing are unheard of in the ditches. The levees and pumps create a physical barrier to the rivers. There is no fish access into the ditch system. Even if they were not fed by O<sub>2</sub>-poor groundwater, these shallow man-made ditches just physically cannot achieve cold-water oxygen solubility needed to support most indigenous fish.

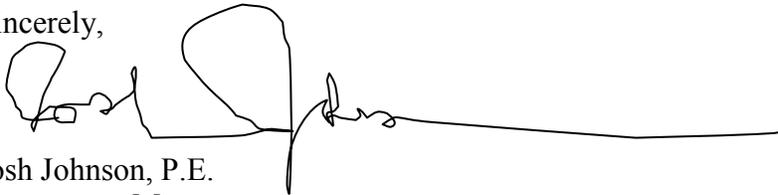
- Recreation Uses. Recreation is equally as unheard of in the ditches. There is no recreation access to ditch waters. In fact, the channels are not suitable for recreation. Side slopes are typically steep (2:1 or less) and channel bottoms beds are a dangerous layer of muck – several feet thick and too soft to support human weight. Additionally, the ditches are narrow and frequently interrupted by gates, culverts, and weirs. Traps installed seasonally to protect the levees from burrowing animals further preclude recreational use.
- Water Supply. There is absolutely no use of the ditches as any form of water supply.
- Miscellaneous Uses. The ditches provide some urban bird habitat. Nutria and beaver are known to be in the ditch system, though they are actively trapped and removed. The only thing harvested from the ditches is muck and aquatic weeds to ensure flow. There is no commerce or navigation on the ditches. With regard to aesthetics, the ditches could use some improvement, but their waters are often not public or so far below grade, as to be out of sight.

*Over-arching Concerns*

Because the Ditches are pumped to the Columbia and Cowlitz Rivers, they are classified as tributaries to the Columbia River. By default the Ditches are assigned the same water quality classification as the Columbia River. Moreover, the ditches are by default classified as primary contact recreation waters. Both designations are grossly inappropriate.

The City of Longview remains committed to the assessment and quality of its surface waters and appreciates the outreach and technical assistance provided by your department. Please keep us informed of any decisions and/or re-analysis regarding these issues. If you have any questions, please call me at (360) 442-5210.

Sincerely,

A handwritten signature in black ink, appearing to read 'Josh Johnson', with a long horizontal line extending to the right.

Josh Johnson, P.E.  
Stormwater Manager

cc. Jeff Cameron, PE – Public Works Director, City of Longview  
Judi Strayer – Manager, Consolidated Diking Improvement District #1