



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 28, 2013

Thom McConathy  
Friends of Vancouver Lake Lowlands  
1017 NE 107<sup>th</sup> Street  
Vancouver, WA 98685

Dear Mr. McConathy:

The purpose of this letter is to respond to your September 12, 2013 letter to the Department of Ecology (Ecology). Your request was discussed in the September 12, 2013 Salmon Creek Total Maximum Daily Load (TMDL) Advisory Group meeting with stakeholders from the community and as a part of the Adaptive Management process outlined in the TMDLs. We thank you for your input during that process and understand your concerns about Vancouver Lake and Lake River.

Your letter references three issues and processes currently underway in Clark County:

- The development of new TMDLs.
- Vancouver Lake and toxic blue green algae blooms.
- Increased BMPs for nutrients and contributions to develop program, capital and operational solutions that will reduce nutrient inflow to the lake to the point that closures occur only once in a 5 year period.

To discuss Ecology's positions on these issues/processes, I will address each separately.

**1. The development of new TMDLs.**

In your letter you requested that Ecology expand the TMDLs on Salmon Creek to address needs of Vancouver Lake and Lake River. You also requested Ecology to consider the development of a new TMDL to address nutrients in Salmon Creek during the stakeholder meeting on September 12, 2013.

Every year, Ecology's Water Quality Program conducts a planning process to determine which water quality improvement projects or TMDLs to begin during the next fiscal year. Each Ecology region reviews where local pollution levels are high (using the 303[d] listings) and determines where new water quality improvement projects should be started.



Burnt Bridge Creek, East Fork - Lewis River, and Lacamas Creek were identified as priority TMDLs for development in Clark County over the past few years based on environmental priorities and staff resources.

Ecology will review the 303(d) listing again this year to determine where new TMDLs should be started, and we will include your letter and ideas in this process. Ecology will also include feedback from all stakeholders and is tasked with prioritizing this effort statewide.

Currently there are two approved TMDLs within the Salmon Creek Watershed:

- 1) Salmon Creek Watershed Bacteria and Turbidity Total Maximum Daily Load (Water Cleanup Plan): Detailed Implementation Plan.
- 2) Salmon Creek Temperature Total Maximum Daily Load: Water Quality Improvement Report and Implementation Plan.

The implementation of these TMDLs is improving water quality in Salmon Creek, and Ecology can continue the Adaptive Management process to fine tune implementation to address additional impairments in the Salmon Creek watershed. We again thank you for your involvement in this process.

## **2. Vancouver Lake and Toxic Blue Green Algae Blooms**

In your letter you state, "Preliminary/Draft results of an USGS nutrient study on Vancouver Lake reveal that Salmon Creek / Lake River contribute in a significant way to Green and Blue green alga blooms on Vancouver Lake."

The Vancouver Lake Partnership is currently addressing water quality needs in Vancouver Lake. Ecology supports this process. During the 2010 Triennial Review process, Ecology responded to comments on WAC 173-201A-230 Nutrient Control in Lakes submitted by you, Don Russell, and the Vancouver Lake Watershed Partnership (VLWP). In the Response to Comments, Ecology stated:

*"Ecology appreciates the willingness of the Vancouver Lake Watershed Partnership to work with Ecology on a project. Ecology will consider developing nutrient criteria for individual lakes, such as Vancouver Lake. The process identified to accomplish this is outlined in Ecology Publication 04-10-033, "Nutrient Criteria Development in Washington State – Phosphorus, April 2004." Faced with budgetary shortfalls, Ecology does not have the resources to complete limnological investigations on individual lakes and any nutrient decisions will need to rely on information collected by others. You noted that the U.S. Geological Survey (USGS) is collecting data on the lake and once this investigation is completed, we would be willing to review the data set against the criteria outlined in Publication 04-10-033."*

The complete response to comments is available at <http://www.ecy.wa.gov/programs/wq/swqs/TriennialRevComm/triennialRevResponsetoCommTable082011.pdf>

The VLWP is using the guidance outlined above, and we are still willing to review the data when USGS has completed the investigation.

**3. Increased BMPs for nutrients and contributions to develop program, capital and operational solutions that will reduce nutrient inflow to the lake to the point that closures occur only once in a 5 year period.**

Ecology is very engaged and willing to support the efforts currently underway by VLWP. We realize the group is close and understand they may set the target at, "closures to occur only once in a 5 year period", but we still need the Partnership and the community to finish establishing the beneficial uses they want to protect in Vancouver lake and for them to set this target.

These actions will feed the TMDLs on Salmon Creek with information on possible sources of pollution and reductions needed to protect the lake.

We are currently working to reduce the input of nutrients and pollution in waterways statewide through the implementation of both the Nonpoint Source Pollution Programs and the Point Source Pollution Programs.

Ecology is working with several different stakeholders on nonpoint pollution and together we are finding solutions. The following website explores several different problems and solutions for reducing nonpoint source pollution: <http://www.ecy.wa.gov/programs/wq/nonpoint/index.html>.

We also update the following National Pollutant Discharge Elimination System (NPDES) General permits every five years:

- Construction Stormwater General Permit
- Industrial Stormwater General Permit
- Municipal Stormwater Permits (Phase I and II)
- Sand and Gravel General Permit
- Washington State Department of Transportation Municipal Stormwater General Permit

We encourage you to comment when these permits are updated. Information on our general permits is available at <http://www.ecy.wa.gov/programs/wq/permits/genpermits.html>.

In summary, we thank you for your letter and input during the Salmon Creek Advisory Committee meeting on September 12<sup>th</sup> and will consider your input during our planning process to determine which water quality improvement projects or TMDLs to begin.

Thom McConathy  
Friends of Vancouver Lake Lowlands  
October 28, 2013  
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I look forward to working with you on solving water quality issues in the Salmon Creek Watershed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brett Raunig", followed by a horizontal line extending to the right.

Brett Raunig,  
TMDL Coordinator  
Water Quality Program