




Water Quality Program Responsiveness Summary

Fiscal Year 1999 TMDL Priority List

August 1999

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Washington State Department of Ecology
Water Quality Program

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Responsiveness Summary

Fiscal Year 1999 TMDL Priority List

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Introduction

This responsiveness summary has been prepared to address public comments pertaining to the Water Quality Program's proposed fiscal year (FY) 1999 Total Maximum Daily Load (TMDL) Priority List. TMDLs are plans for cleaning up polluted water bodies so they can meet water quality standards. Water cleanup plans (TMDLs) identify the pollution problems, allocate the maximum allowable pollution from various sources, and develop strategies to achieve those limits.

Why Develop Cleanup Plans (TMDLs)

Section 303(d) of the Clean Water Act (CWA) requires that, every two years, states prepare a list of water bodies that fail to meet water quality standards. All water bodies identified on the list must attain water quality standards within a reasonable time frame, either through a TMDL, or through other pollution controls.

TMDLs have five main components:

- ◆ Identification of the type, amount, and sources of water pollution in a particular water body or segment,
- ◆ Determination of the capacity of the water body to assimilate pollution and still remain healthy,
- ◆ Allocation of how much pollution each source will be allowed to discharge,
- ◆ A strategy to attain the allocations, and
- ◆ A monitoring plan to assess effectiveness.

What is a Typical TMDL Process?

Typically, a cleanup process begins with the development of a technical report analyzing the pollution parameters identified for a water body in the Section 303(d) list of impaired water bodies. This study takes approximately one to two years to scientifically identify the pollution sources and the load allocations needed to return the water body to standards. The technical report provides a single source of data and analysis for the community and Ecology to join together to determine pollution control strategies.

During this period, involved members of the community are apprised of the situation as it develops. Pollution control strategies will be reviewed together and converted into solutions and activities. Solutions should be economically feasible and capable of early implementation by the community and Ecology. Implementation activities may continue for some time into the future until follow-up monitoring indicates that water quality standards have been reached.

What is the Schedule for Washington's Cleanup Plans?

According to a legal settlement agreement signed in 1998, Ecology has 15 years to develop plans to clean up 666 water bodies, to help local governments write their own

plans, or to work with them in partnership. Reviews every five years will evaluate progress. The water bodies identified on the FY1999 TMDL Priority List begin the fifteen-year schedule and clean up process (see priority list below).

Priority Water Bodies Proposed for Cleanup Plans in FY99

WRIA	Water Body Name	Parameters that Exceed Water Quality Standards
18	Matriotti Creek/Dungeness River/Bay WQ Study	Fecal coliform
25	Longview ditches	Fecal coliform, dissolved oxygen, turbidity, lead
28	Gibbons Creek	Fecal coliform
28	Salmon Creek	Fecal coliform, temperature, turbidity
29	Wind River	Temperature
59	Colville Watershed (12 water bodies)	Fecal coliform, dissolved oxygen
5	Stillaguamish River & Portage Creek	Fecal coliform, dissolved oxygen, turbidity, pH, ammonia, temperature, copper, lead, arsenic, and nickel.
30	*Little Klickitat River	Temperature

* Proposed if funding becomes available.

Responsiveness Summary Background

The FY1999 TMDL Priority List was developed as a result of a considerable year-long effort that began in September 1998. This included:

- ◆ holding workshops last fall to identify priority water bodies for development as TMDLs;
- ◆ informally discussing these selections with the public;
- ◆ consideration by an Ecology joint management team; and,
- ◆ a formal public comment period held between March 30 and May 10, 1999.

Comments were received and considered from 21 individuals and entities. Respondents asked a number of questions concerning the water bodies selected and others. Most questions did not challenge the need for cleaning up the suggested water bodies. The majority expressed interest in why Ecology could not expand their TMDL efforts into more water bodies near the residences of the respondents. The obvious answer to those questions is that there are insufficient resources to do the amount of work that is needed.

Several respondents specifically questioned the practicality of establishing a TMDL on the Longview Ditches. A special agency review committee was formed to consider the questions and to look into the status of the "ditches". The committee included individuals having technical, historical, managerial and general perspectives. They recommended, and management accepted, continuing the establishment of a TMDL on this water body. However, inherent to that decision was the recognition that this may be a longer than

normal process requiring considerable collaboration with and assistance from local stakeholders. The Longview Ditches will be a difficult and complex effort, and because of that it needs to begin soon.

Each water body listed was also reviewed for its potential for meeting water quality standards through pollution controls other than TMDLs. No water bodies were deferred due to other pollution controls.

After considering all the public comments contained here-in, the final FY1999 TMDL Priority List is as shown in the above table.

This summary was originally prepared for distribution in July 1999. Its completion was delayed awaiting complicated funding decisions which directly affected Ecology's ability to establish TMDLs. These decisions were received late in August 1999. The FY99 TMDL Priority List was completed and a public announcement made in September 1999.

TMDL Responsiveness Summary

Public comments included in this responsiveness summary came from individuals and entities located in western Washington. Those comments originating in the north areas are addressed first, followed by those originating from the peninsula, central, and southern areas. The names of respondents are shown in parentheses at the end of each comment. Some editorial adjustments were made to consolidate questions and comments. Responses to comments are in italics.

North West Regional Office (NWRO)

Comment: The first page of the FOCUS Sheet states, "Typically, the pollution comes from every day sources like household garden chemicals, urban streets, agriculture, logging, and failing septic systems". This does not recognize today's most probable source: marine mammals and waterfowl. Examples include South Puget Sound and the swimming beach closures in King County. It's politically correct just now to blame humans for everything and other nature for nothing. (Maxine Keesling)

Response: *A TMDL begins with a technical study. This study is done to determine the pollution levels present in the water, to identify the probable sources, and to set load limits, which will return the water body to water quality standards. If the study determines that the pollution is caused by marine mammals and/or waterfowl, then the source of pollution will be determined to be from a natural condition. At that point, the natural conditions become the standard and Ecology would work, monitor, and encourage local efforts to preclude additional degradation of the water quality. The State water quality standards allow for a background level of bacteria. For example, the bacteria standard for class A freshwater is a geometric mean of 100 colonies per 100 mL. Marine mammals and waterfowl may seem to dominate the aquatic landscape in urban areas, however they are not a credible explanation for extraordinary bacteria counts during the winter rainy season in many of our rivers upstream from the mouths.*

Comment: Blackmans Lake and its associated creek, Swifty Creek, flow entirely through the City of Snohomish. There have been comprehensive studies and there is strong community support and continued volunteer monitoring. Therefore, it would be cost-effective to permanently clean-up Blackmans Lake and Swifty Creek. (Mary Keppler)

Response: *Blackmans Lake (WA-07-9060) is carried on the 303(d) list for Total Phosphorus. It has completed a Phase I State Clean Lakes Restoration Project in 1994. The study documented dense algal blooms, low dissolved oxygen and high fecal coliform numbers. Storm water run-off contributes 55% of the phosphorus loading. In the summertime, in-lake release of phosphorus from bottom sediments is also a significant*

source of pollution. No Phase II restoration project has begun. This is an essential next step and should be done with or without establishing a TMDL. An active Phase II Clean Lakes Restoration project would be a positive incentive to include Blackmans Lake into a lakes TMDL in 1999.

Swiftly Creek is not carried on the 303(d) list and therefore would have a low priority for establishing an immediate TMDL.

Comment: The Quilceda and Allen Creeks should be a priority for cleanup. They run through urban areas and recreational areas where children have access to waters too polluted to wade in. (Bruce Tipton)

Response: *The Quilceda and Allen Creeks are carried on the 303(d) list for fecal coliform and dissolved oxygen. They have been incorporated into project CN, Snohomish River Conventinals, which is an ongoing TMDL investigation. The TMDL technical report for these two creeks was completed in 1997. Water Quality's Northwest Regional Office (NWRO) has been briefed on the technical report and is considering a public comment period and the preparation of a summary implementation strategy as the next steps in the process.*

Snohomish County, in coordination with Joan Drinkwin (360-856-3558) of the Puget Sound Action Team, has developed a watershed plan under the guidance of WAC 400-12. This plan has recently been developed and must be reviewed by the NWRO for its adequacy in cleaning-up the pollution parameters noted on the 303(d) list. This process is underway and should produce results in late summer 1999.

Comment: WRIA 5 is overdue and cannot wait for a clean-up plan. The Stillaguamish watershed has been passed over for too many years with respect to the Clean Water Act and habitat conservation plans (HCPs) for both the Skagit and Stillaguamish Rivers. (Orin L Barlund)

Response: *The Stillaguamish River was recommended and approved for a TMDL to begin in summer 1999 subject to the receipt of additional resources from EPA and the 1999 legislature. As of this writing, these resources have not been resolved.*

This area should be and was a high priority for a TMDL when reviewed by the Joint Management Team in February 1999. On the 1998 303(d) list, the Stillaguamish River and Portage Creek occupy 50 of the 209 line entries. It is also one of our first WAC-400-12 planning basins. Currently, Ecology determined that there was a lack of resources requisite to accomplishing this priority TMDL. Additional resource funding was requested from the legislature so that in the future more water bodies can be considered and TMDLs established.

Southwest Regional Office (SWRO)

Comment: Suggest Bagley Creek (for a TMDL), which flows from the Olympic Mountains to the Strait of Juan de Fuca, East of Port Angeles. The water is yellow with lots of suds floating on top. (Parenthesis added for clarity). (Charles E Strickland) [cstri01@emory.edu]

Response: *Bagley Creek is carried on the 1996 303(d) list (WA-18-1600) for fecal coliform violations. Since it is on the list, Bagley Creek has been considered and scheduled for a future TMDL. Currently, it is scheduled as part of Project F7, to begin in the year 2009. Project F7 is a large landscape effort, which includes Bagley Creek and a number of other water bodies in the drainage. The year 2009 represents the beginning of Ecology's third TMDL cycle in the Eastern Olympic Water Quality Management Area. Each cycle has a five-year duration. The cycles were designed to distribute the workload so that current and projected resources could be properly programmed to accomplish the work. Water Quality staff are reviewing the conditions in Bagley Creek. The TMDL schedule is revised annually based upon current accomplishments and new water body/watershed information and changes in priority are possible.*

The yellow/brown color and suds were considered and determined to be a natural condition. There are considerable deposits of peat in the watershed, which contributes to the brown color of the water. Due to the extremely wet year of 1998/1999, considerable quantities of ground water continue to leach out across the area mixing the brown color into the waters of the creek. The suds are created by the turbulence of water flowing in the creek and over adjacent vegetation. Similar suds occur in many of the creeks to the east of the Bagley Creek basin.

Comment: Other watersheds in Clark County should also be considered for TMDLs. What are the objective criteria for water body selections? (Thom McConathy)

Response: *All of the water bodies within Clark County that appear on the 1996 and 1998 303(d) lists were considered and scheduled for establishing TMDLs. The four water bodies recommended for TMDLs to begin in state FY2000 were prioritized and selected in November 1998 by a workgroup of individuals knowledgeable in the Water Quality Management Areas under consideration. The criteria used for making these selections included the severity of the pollution, potential harm to human and aquatic health, impaired beneficial uses, and the potential for local support for pollution control activities. To help Ecology verify selection of these waters, meetings were held with interested groups in the surrounding local communities between November 1998 and January 1999. The issue of objective criteria is further discussed below.*

There is a limited number of staff available to conduct the technical studies needed for a TMDL. Ecology developed a fifteen-year TMDL schedule that is divided into three

cycles. Each cycle has a five-year duration. The cycles were designed to distribute the workload so that current and projected resources could be properly allocated to accomplish over 1500 TMDLs required. However, water quality staff are constantly reviewing the conditions in the other water bodies within Clark County for new information and changes in priority. The TMDL schedule is also revised annually based upon recent accomplishments and new water body/watershed information and priority changes are possible.

Comment: The Lacamas watershed has exceedences in eight different categories, has a significant fishery, and is extensively used for recreation. This watershed also has received considerable community participation and volunteer efforts as is documented in the present grant program that will be ending soon. (Thom McConathy)

Response: *Lacamas Creek is carried on the 1996 303(d) list (WA-28-2020) for pH, temperature, dissolved oxygen, and fecal coliform. Currently it is scheduled to begin a TMDL in the year 2009, the third cycle of the 15 year TMDL schedule. . In the meantime, as is mentioned in the comment Ecology will be funding a major effort directed at nonpoint education through the Lacamas Lake Grant. Since there is a natural blockage on the lower creek the Lower Columbia Fish Recovery Board does not give this stream a high priority for action.*

Comment: Burnt Bridge Creek was 305/(303d) listed and had proposed TMDL standards recommended by DOE which were never finalized. This urban creek has exceedences in eight separate categories including fecal coliform. (Thom McConathy)

Response: *Burnt Bridge Creek is carried on the 1996 303(d) list (WA-28-1040) for pH, temperature, dissolved oxygen, and fecal coliform. Currently it is scheduled to begin a TMDL in the year 2004, the second cycle of the 15 year TMDL schedule. An assessment by the Lower Columbia River Fish Recovery Board ranked this stream in the second tier of streams needing action. At the current time there is a storm water utility in place for Burnt Bridge Creek that may have considerable impact on the parameters listed.*

Comment: East fork Lewis has numerous exceedences including fecal coliform and was 305 listed. This watershed has some of the highest fishery values in Clark County. This is one of the fastest developing watersheds in Clark County. The development is almost exclusively on septic tanks. These rapidly draining soils should not be used for septic tank outflows. (Thom McConathy)

Response: *The Lewis River, E.F., is carried on the 1996 303(d) list (WA-27-2020) for temperature, pH, and fecal coliform. As of this writing, there still is a possibility that a temperature TMDL will be established in FY2000 for the Lewis River if additional resources are provided. The remaining parameters will be addressed during a subsequent cycle of the 5-year TMDL schedule. During the next 3 years, considerable*

work will be done on the Lewis River system by Pacific Corp as they complete a FERC re-licensing process for North Fork Lewis River Dams. Work will continue on the East Fork Lewis River Restoration Grant that is being done by Clark County.

Comment: The Washougal was also 305 listed and is developing as rapidly as the East fork of the Lewis with many of the same problems of septic tank loading of nutrients into both surface and groundwater. (Thom McConathy)

Response: *The Washougal River is not carried on the 1996 303(d) list. However, its problems have been recognized as exceedences in dissolved oxygen, turbidity, fecal coliform, and lead. Because of these standards violations it was recommended for a TMDL to begin in FY2000, the first cycle of the 15-year TMDL schedule. Given the current status of Ecology resources and the fact that the river was not a listed water body, the Washougal did not receive the priority needed to be selected into the first TMDL cycle. It is now being re-positioned for consideration during another cycle of the TMDL schedule.*

Comment: Lake River has consistently been 305 listed and drains Vancouver Lake. It has been consistently one of the top dirtiest lakes in Washington for the last 12 years. This waterway has high fishery values that drains many other small watersheds. This waterway is subject to tidal influences and backwashes. (Thom McConathy)

Response: *Lake River is carried on the 1996 303(d) list (WA-28-1030) for temperature and fecal coliform. Currently it is scheduled to begin a TMDL in the year 2009, the third cycle of the 15-year TMDL schedule. In the meantime, one of the prime tributaries to Lake River, Salmon Creek, will be worked on as a high priority for this cycle.*

Comment: The concentration of nutrients and other contaminants in Vancouver Lake has made this regional recreation area a hazard to swimming and rendered it eutrophic. Neither Vancouver Lake nor Lakamas Lake were included in this listing. (Thom McConathy) [thomm@pacifier.com].

Response: *Lacamas Lake is an Active Phase II State Clean Lakes Restoration Project. Control measures are underway based on the Phase I study, such as watershed nutrient management (dairy waste BMPs, stream bank fencing, septic system management, ordinance development) and public education. Implementation of control measures will be required to be completed by December 2001 under the conditions of the grant. Monitoring is being conducted under Ecology's Lake Water Quality Assessment Program. The above information meets EPA guidance for excluding the lake from listing under federal regulation 40 CFR130.7(b)(1)(iii).*

Vancouver Lake: Completed Phase II Federal Clean Lakes Restoration Project in 1986. Control measures implemented based on the Phase I Study - sediment removal/dredging,

dilution/flushing. Monitoring is being conducted under Ecology's Lake Water Quality Assessment Program. The above information meets EPA guidance for excluding the lake from listing under federal regulation 40 CFR130.7 (b)(1)(iii).

Comment: *Salmon Creek has been targeted for cleanup because of high temperatures caused by "logging, agriculture, or development that removes shade-giving vegetation from banks". Clean up should not be delayed for 18 months until a plan is completed. (Kenneth S Hodge)*

Response: *Salmon Creek is also listed for fecal coliform and turbidity violations. These two parameters were considered as part of an earlier TMDL study. The Salmon Creek TMDL study was completed in October 1995. Therefore, the load allocations (targets) have been established and need to be implemented. The next step for Ecology is to stimulate sufficient local interest to implement pollution control measures to reduce or stop the discharges. The Salmon Creek TMDL is ready for public review and implementation as soon as local concern and involvement can be established. Ecology will begin these activities in the summer of 1999.*

Comment: *Clark County is preparing to construct two five-foot bicycle lanes on either side of Salmon Creek Avenue. New lanes will add almost 53,000 square feet of hard surface per mile, adding to the runoff. Also, large Douglas fir trees now shading the creek will be destroyed. (Kenneth S. Hodge)*

Response: *The possibility of pollution and reduced shade in Salmon Creek caused by the addition of bicycle lanes along Salmon Creek Avenue are definite environmental concerns. The majority of these issues fall into the stormwater category. Ecology will inquire to ensure that Clark County has applied the mandates of their stormwater plan to the construction of these bicycle paths and tree removals. However, these are land-use decisions that are within the prerogatives of the county government. Ultimately, county residents must address these considerations and decisions directly with their local governments.*

Comment: *The TMDL water body selection process was not objective and the public outreach was inadequate. (Thom McConathy)*

Response: *The TMDL selection process and the accompanying public outreach was the best Ecology could provide in 1998/1999. The process began in September 1998 by considering the 1996 and 1998 303(d) lists within five water quality management areas. Each regional office held a daylong workshop in November 1998 consisting of staff representing Ecology, federal, and local agencies. The workshops used the following criteria: the severity of the pollution, potential harm to human and aquatic health, impaired beneficial uses, and the potential for local support for pollution control activities.*

Ecology did not use a numeric type (objective) ranking system in making TMDL selections. Rather, the collective knowledge of the representatives of each geographic area was applied to help finalize decisions. The workshops looked at the global number of 303(d) listings, discussed the issues, and selected water bodies for the FY1999 Priority TMDL List. All other impacted water bodies were not forgotten; they were planned to be addressed during one of two future five-year cycles.

Representatives attending the workshops understood that environmental success in an area was hinged on many factors surrounding each specific water body including the impact of available resources to do the work. TMDL work includes holding public meetings (large and small) to discuss the issues. During November 1998 to January 1999, water quality staff obtained public comments on the 303(d) list and Ecology's initial list of selected water bodies from numerous local individuals and entities. In SW Washington considerable effort was expended by the Lower Columbia Fish Recovery Board Technical Advisory Committee and the Board in establishing these priorities. In addition local conservation districts and other local governments were consulted. Statewide, this interface was accomplished by a combination of mailings, small group meetings, public meetings, and by attending forums already established by local groups.

After receiving the above public input, each regional office presented their proposed list of water bodies to Ecology's management team for approval. A project list was then constructed, projects were scoped, priorities applied, and resources estimates were made. The final FY1999 TMDL Priority List was formulated after several iterations of prioritizing projects and balancing resources. This final list along with a request for public comment were placed into a FOCUS Sheet and mailed to approximately 800 organizations and individuals in Washington. A follow-up announcement was published in six local newspapers.

Additional public outreach activities were desired and were planned throughout the above process. Ecology's involvement this year was limited by the availability of current resources. Additional funding has been requested from the legislature so that in the future more water bodies can be considered and public outreach activities can be increased.

Comment: An Area of Peabody Creek (South of Port Angeles) is being used by a group of youth for mountain bikes, trails, paths, and jumps. The results of their recreational activities are fires, bike parts, trash, and human excrement in and near the stream. The concerns are for possible environmental damage and lawbreaking. (Ron and Christy Casey)

Response: *Peabody Creek is not carried on either the 1996 or 1998 303(d) lists. Consequently, a TMDL is not scheduled for this water body. However, Ecology is currently funding a Centennial Clean Water Fund project called the "Eight Streams Project" that has a sampling location just downstream of the site noted in the above comment. The grant project is ending, but Clallam County will continue funding a*

coordinator for this volunteer sampling effort. Ed Chadd and Jessica Baccus share the position, and volunteers will be collecting more parameters (including fecal coliform and suspended solids and related data) later this year. Should these monitorings indicate a failure of the waters to meet water quality standards, Peabody Creek will be considered for listing on the next 303(d) list.

Ecology has inquired to ensure that local authorities have been made aware of the issues of concern and potential for water quality degradation. The issues stated in the above comment are local government land-use concerns that must be dealt with at that level. Ultimately, such issues must be addressed by residents directly with their local government for disposition and resolution. David Sawyer from the City of Port Angeles (360-457-0411 ext. 4752) has visited the site. Port Angeles intends to have the tracks in the critical areas buffer removed this year.

The following comments were made by a combination of the City of Kelso, City of Longview, Cowlitz County, The Weyerhaeuser Company, and the Consolidated Diking District Number 1.

Comment: Longview Ditches. The agency resources needed to conduct a TMDL would be significant. Sufficient information already exists to decide on an effective set of regulatory actions. (Ken Johnson - Weyerhaeuser)

Response: *The Longview Ditches are carried in the 1996 303(d) list (WA-25-5010) for violations of levels of fecal coliform, dissolved oxygen, turbidity, and lead. In 1993, Ecology conducted a Water Quality Assessment (Part I) and a Chemical Screening of Sediment samples (Part II) of the Longview Drainage System. This study considered the above pollution parameters and others. The document also expressed concerns about the usefulness and the anticipated difficulties if a conventional TMDL was to be established on the ditches. Therefore in the first year (1999 - 2000), the new work will begin with an assessment focusing on sources of pollution and hydrology. The assessment should also point the way toward the anticipated future rigor required to complete a TMDL.*

Comment: Ecology has never assessed the Ditches to determine their actual uses or the natural conditions or background levels.

Response: *See above response. There has not been a formal use attainability assessment made on the waters of the Longview Ditches. A follow-on assessment may be indicated as a result of the initial TMDL assessment scheduled to begin in FY2000. However, public workshops have been held in the area. The result of these workshops was that local citizens remembered these waters being used for fishing and swimming. They further expressed their desire for a continuation of these uses into the future.*

Comment: Ecology should direct resources to assure full compliance with existing Industrial and Construction NPDES Stormwater General permitting requirements.

Response: *The Water Quality Program of Ecology would like to implement a more aggressive stormwater program assuring compliance with Industrial and Construction Stormwater General Permits. However, the magnitude of water quality work produces resource limitations that constrain capabilities and disallow the physical presence and the administrative oversight necessary to ensure full compliance with permits. Considerable confidence must be vested into voluntary compliance by permit holders and others who are genuinely concerned about the state of the environment.*

Comment: It should be recognized that EPA's Phase II Municipal Stormwater Permitting program will be promulgated in October 1999.

Response: *Ecology does recognize that these new regulations need to be promulgated beginning in October 1999. The organization, readiness, and willingness of local entities to implement these new requirements will be a key consideration of the initial TMDL assessment. The potential effects of their implementation will also be part of the study.*

Comment: Ecology should assure that any process wastewater discharges to the Ditches are under NPDES permit and using AKART.

Response: *Ecology agrees with this comment.*

Comment: Ecology should delay initiating a TMDL until the Water Program has completed work on the "use based standards" approach. It would be irrational to start a TMDL until the Triennial Review process is completed in first quarter 2000.

Response: *The Longview Ditches are designated a Class A water body because they are a tributary to the Columbia River. It is anticipated that this TMDL will not be completed during a normal time frame due to the complexity of the issues involved. There should be sufficient time to resolve the classification issue prior to the TMDL finalizing loading capacities.*

Comment: The determination that lead exceeds the chronic water quality criteria should be re-evaluated.

Response: *One of the parameters causing the Longview Ditches to be carried on the 303(d) list is the presence of excessive lead. The levels of lead present in the waters of the ditches will be a routine determination of the TMDL scientific study. Before a final determination is made, the study will evaluate the water body's assimilative capacity for lead based upon the standards and waterway classification.*

Comment: The Longview Ditch system should not be included in the priority list until an assessment of the classification of this water body is made, and appropriate water quality standards are set for the ditch system. (Martin Carty - Cowlitz County)

Response: *The work planned for FY2000 (July 1999- June 2000) includes conducting an initial assessment in preparation for additional follow-on technical work. The initial assessment may indicate a need for a use attainability study. If so, this assessment would also be conducted. Simultaneously, the triennial review process will be underway. These processes should set the appropriate water quality standards for this water body.*

Comment: The City believes that classification of the ditches as a Class A water body has happened by default. (Bob Gregory -City of Longview)

Response: *The Longview Ditches are designated a Class A water body because they are a tributary to the Columbia River. Water is pumped from the ditches into the Columbia and Cowlitz rivers.*

Comment: Ecology's first concern in addressing Longview Ditches and their appropriate level of water quality should be to evaluate the classification of the ditches during the upcoming triennial review of the state water bodies.

Response: *The TMDL technical study will also address the question of water body classification; therefore there is no need to delay. A use attainability analysis may be accomplished at the end of the initial assessment planned to begin in FY2000.*

Comment: The City questions what additional tangible benefits will be achieved from a TMDL study.

Response: *The Longview Ditches are waters of the state and as such must meet water quality standards. Currently these waters are out of compliance with standards and are listed as impaired on the Section 303(d) list. Accordingly, the CWA requires that a water cleanup plan or TMDL be developed for each polluted water body so as to return those waters to meet standards. As a tributary to the Columbia River, water quality standards must be assured for current uses and also for the benefit of generations to come.*

Comment: Ecology and the city have very limited implementation alternatives to meet any expected TMDL requirements. Ecology would be better served by learning more about the physical characteristics, purpose, and uses, and the limited opportunities to address a traditional cleanup.

Response: *A sequential TMDL study beginning with an initial assessment should establish the range of possible alternatives for cleaning this water body. At that point, consideration can be given to selecting the best available alternative.*

Comment: Both cities and the local diking district have recently begun an aggressive program to implement BMPs throughout the drainage basin.

Response: *Ecology is aware of and is supportive of BMP initiatives begun by local entities. As part of the decision to proceed with a TMDL, it was agreed that a special effort needed to be made to merge all concerned private and public interests into a local workgroup. Ecology would like to join such a workgroup for the purposes of ensuring the coordinated implementation of BMPs and to assist with TMDL development activities.*

Comment: EPA's promulgation of the NPDES Phase II (stormwater) program will further assure improved water quality.

Response: *Ecology agrees with this comment and would like to monitor anticipated improvements. Further, the initial TMDL assessment will consider these potential improvements and place them in perspective for continued water quality studies.*

Comment: The City of Kelso disagrees with the TMDL on the Longview Ditches because: (Jeff D Cameron - City of Kelso)

- ◆ Inappropriate Classification of the Longview Ditches as a Class "A" water body
- ◆ Priority of other water bodies should be higher especially in view of the ESA listings.
- ◆ The expected results of a TMDL study may be unreliable and the cleanup - plan will be unrealistic.

Response: *The questions of classification have already been addressed in other responses above. Given the pollution levels in the Longview Ditches, water quality standards could not be attained by just changing the classification to Class B. All water bodies on the 1996 303(d) list have been scheduled for a TMDL during the 15-year schedule in the settlement agreement. By following this schedule, Ecology will address ESA priorities. Cleaning the waters of the Longview Ditches will also be a benefit to fish in the Columbia and Cowlitz Rivers. The complexity of this water body also dictates that a TMDL process begins early in the 15-year period. Every effort will be made to develop and produce a reliable scientific TMDL study. From that point, Ecology will work collaboratively with considerable local involvement to produce realistic on-the-ground cleanup strategies. The value of that plan will equal the level of effort put into its development and refinement.*

Comment: The reason for the Longview Ditches not meeting Class A standards is due to natural occurring conditions. It may be that the classification needs to be changed. (Sherry Bean, Merritt H Ketchem, Bill Hallanger - Consolidated Diking District No. 1)

Response: *One of the inherent purposes of a TMDL study is to determine the levels and sources of pollution. The study's results will allow refined judgements to be made as to the assimilative capacity of the waters, their proper classification, and what levels of pollution are considered to be natural. Reliable judgements cannot be made without such a factual study. The scientific documentation of current conditions must be made before anyone can properly adjudge the potential attainment of water quality standards in the Longview Ditches.*

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