



April 25, 2005

TO: Jane Creech, Washington State Dept. of Ecology
FROM: Kathleen Satnik, Kittitas County Water Purveyors
RE: Wilson Creek Sub-Basin Bacteria Total Maximum Daily Load (Water Cleanup Plan) Submittal Report *Draft*

The Kittitas County Water Purveyors (KCWP) is a proactive group comprised of local irrigators that formed in 1999. We have been actively involved in the technical process leading up to this draft document, and acknowledge the dedication and hard work of other local groups as well as the Department of Ecology—especially that of Jane Creech.

Despite the efforts of the Technical Workgroup, Ecology, and EPA, the TMDL Submittal Report is still controversial and may not be well-met in our community for the following reasons:

- 1) No health problems have been reported to the Kittitas County Health Department, nor did the Health Department participate in the process on a regular basis.
- 2) The uses for which we are required to protect the water are typically illegal or non-existent (such as swimming). Where those uses could potentially exist in this sub-basin, no data has shown an exceedance over state standards.
- 3) There is no evidence that the bacteria levels are primarily the result of humans, either through faulty septic or land use practices. In fact, some evidence suggests the opposite.
- 4) We have yet to be shown an instance where the suggested ag-related BMPs were effective in a landscape similar to our valley. Without assurance that implementing BMPs will reduce bacteria counts to the required levels, spending large sums of money on BMPs is outright unintelligent.
- 5) Finally, the percentage of bacterial colony decrease required in some instances is statistically impossible. We've been told by Ecology that this is where adaptive management will play a role. It makes no sense to us to set statistically impossible goals just to change them later on.

Thank you for the opportunity to comment on this draft. We look forward to working together with Ecology and others on the Detailed Implementation Plan.

Sincerely,

Kathleen Satnik, Water Quality Specialist
Kittitas County Water Purveyors