Redburn, Doug

From: Decker, Eric
To: HHW-Bruce Jones, Petersburg; Schlichting, Sally; Clare, James
Cc: Schrader, Carl; Redburn, Doug; Decker, Eric; Braley, Susan
Subject: RE: Why Hammer Slough is on the 303d list
Date: Monday, February 05, 1996 3:22PM

The following is a chronology of events that led to the Section 303d listing decision of Hammer Slough (the waterbody is on the final 1994 303(d) list, and candidate 1996 303(d) list currently out for public review), and what happens next:
1. December 1993. An ADF&G habitat biologist in Petersburg submits a waterbody assessment form on Hammer Slough to ADEC. The information was BPJ documentation that Hammer Slough had excessive siltation the length of the waterbody from the city/state rockpit and runoff from unpaved city streets compounded the problem.
2. May 1994. ADEC submits 39 waterbodies to EPA for Section 303(d) listing approval. Hammer Slough is NOT on this submitted list. EPA partially disapproves the list for the State failing to include other waterbodies that may qualify for 303d listing.
3. Summer 1994. Seattle EPA staff review ADEC waterbody files in Juneau and conclude approximately 130 waterbodies, including Hammer Slough, qualify for listing (the ADFG assessment information is the key info used by EPA to justify this preliminary listing decision).
4. Winter 1994/1995 and Spring 1995. ADEC and EPA staff sit down with available information, and additional information solicited from ADEC field offices and other sources, to office review all 130 plus waterbodies. It is ADEC's continued position during this time that Hammer Slough NOT be listed because there is insufficient information to warrant 303d listing - waterbody needs a field investigation.
5. Summer 1995. The list of 303(d) waterbodies narrows to about 60-but EPA 303d staff will not budge on Hammer Slough. The final 1994 list was 56 waterbodies, including Hammer Slough. EPA approves final list of 56 in August 1995.
6. Fall/Winter 1996. Draft 1996 305(b) report prepared along with candidate 1996 303(d) list. Candidate 303d list is 53 waterbodies since three waterbodies meet the de-listing criteria specified in the draft 305b report. There is no additional information on Hammer Slough so it is left on the candida[illegible] list.
What happens next:
1. ADEC will accept comments/information until March 1 for purposes o[illegible] paring a final 1996 305b report and final State 1996 303d list. If there is submitted information on Hammer [illegible] it will be reviewed and a final State listing decision made prior to April 1 (deadline date to submit to EPA final [illegible]05b and 303d list).
2. ADEC staff will conduct a field assessment of Hammer Slough some[illegible] [illegible]pring (probably in April). This assessment, and follow-up documentation (including any recommendatio[illegible] [illegible]coordinated by Doug Redburn (Coastal Watersheds Team Leader 465-5303). This assessment [illegible]led last Fall, but the early Fall freeze-up prevented this from happening. The field review will be conc[illegible] [illegible]dination with at least the following entities: the City of Petersburg, ADFG, and DOT/PF.

From: Clare, James
To: HHW-Bruce Jones; Schlichting, Sally
Cc: Decker, Eric
Subject: RE: Water Quality Standards
Date: Friday, February 02, 1996 4:21PM

That's two of us closing in on consensus with similar recommendations.

From: Schlichting, Sally
To: HHW-Bruce Jones; Clare, James
Cc: Decker, Eric
Subject: RE: Water Quality Standards

Date: Friday, February 02, 1996 4:08PM

Below is a quote from a memo I drafted last summer to Eric:

During my recent review of the Environmental Assessment for the Petersburg Airport Runway Resurfacing Project, significant discussion occurred regarding the allegedly impaired stream, Hammer Slough Creek, which is situated close to the project. Hammer Slough is currently on the State's Tentative Revised 303(d) List for impairment from sedimentation and habitat modification.

According to City of Petersburg staff, turbidity events in Hammer Slough have been observed during periods of high flow, but a source has not been confirmed. It was originally suggested that the airport was providing a key source of sedimentation through the use of sand and gravel during the winter. However, according to DOT and their consultant, Dunn Environmental, the airport makes only minimal usage of sand and gravel during the winter months, relying primarily on urea for ice control. Thus it could be concluded that any runway runoff would be fairly free of sediment. Another possible cause may be due to activities in the municipal quarry further upstream from the airport, or the condition may simply be a result of natural causes. With regard to impacts due to habitat modification, no evidence was presented that such impacts have occurred. In speaking with the City of Petersburg, DOT and DEC Sitka District staff, the consensus was that there is no clear indication Hammer Slough is impaired.

It is recommended that a site visit be conducted, to include walking the stream's entire length and interviewing local citizens for year-round observations. Until this is accomplished, impairment cannot be confirmed.

From: Clare, James
To: HHW-Bruce Jones
Cc: Decker, Eric; Schlichting, Sally
Subject: RE: Water Quality Standards
Date: Friday, February 02, 1996 2:42PM

Oh, yes. I tried to determine why this one would be on the list one other time. If I did originally suggested it, which I doubt, the suggestion was based on someone else's suggestion. My recommendation would have been based on impacts due to sewage systems failing in the area. Since everything is on sewer now, that would not apply.

I notice the reason it is on the 303(d) for 1996 was sedimentation from urban runoff. In 1994 the sedimentation was due to timber harvesting. The impaired listing notes urban runoff and gravel mining as pollutant sources. I suspect this was a Fish and Game Dept. recommendation, although I cannot fathom how it would be determined impaired, especially without some data to actually demonstrate that it is.

I remember a discussion with Sally Schlichting about this and the pollutant contributions from the airport. Since the airport uses urea, I don't understand how it could possibly contribute sedimentation.

Maybe Eric Decker has the history here to help us out. If we can determine why it is on the list, and if the conditions no longer support it, it should be removed.

From: HHW-Bruce Jones
To: Clare, James
Subject: RE: Water Quality Standards
Date: Friday, February 02, 1996 11:38AM

Hammers Slough

From: Clare, James
To: HHW-Bruce Jones
Cc: Buggins, Mark City of Sitka

Subject: RE: Water Quality Standards
Date: Thursday, February 01, 1996 1:10PM

Which water body is on the list. Maybe I had something to do with that, or maybe I can have something to do with correcting inadequacy.

From: HHW-Bruce Jones
To: Clare, James
Subject: RE: Water Quality Standards
Date: Thursday, February 01, 1996 10:05AM

Jim, Any comments for the Association should be sent to Phillis Benson or Craig Nordgren at the Assoc. office @ FAX 907-456-2683. I received a copy over the E-Mail from P. Grefsrud. I would also like to see your comments. Helps me get my thoughts together.

On another Public Comment period; I just E-mailed Eric Decker and asked for a copy of the advertised "Draft 1996 Section 305(b), Water Quality Assessment Report. One of our waterbodies is on the list and I've never been able to get it off. Now it seems to be official. As soon as I've looked it over I'll write my comments and send them over for your review/concurrence/help on the subject.

From: Clare, James
To: HHW-Bruce Jones, Petersburg; Buggins, Mark City of Sitka
Subject: Water Quality Standards
Date: Wednesday, January 31, 1996 4:16PM

Did you receive the mixing zone and "plain english" proposals? If not, we got 'em here in the office. AWWA ought to be reviewing and providing comment. On that effort, who do I share my comments with, when I'm finished?