From: Peoples, Marty D (DFW)
To: SEPADesk2 (DFW); thagan@co.pierce.wa.us
Cc: Matson, Craig D (DFW)
Subject: Response to Pierce County"s Comments
Date: Friday, April 14, 2017 10:21:16 AM

Dear Mr. Hagan,

Thank you and Pierce County for your comments on WDFW's proposed project (DNS 17-012: Clarks Creek Hatchery Rehabilitation). WDFW is dedicated in its mission of protecting the environment; specifically, in this case, the Clarks Creek Watershed. The objective of this construction project is to help restore threatened salmon and steelhead runs in the Puyallup River Basin, this is in full cooperation with the Puyallup Tribe. WDFW is converting the existing hatchery from primarily trout production, to primarily salmon and steelhead production as directed by Washington State Legislation. Polluting Clarks Creek would be in direct conflict with the project goals.

WDFW will have a complete and approved SWPPP kept up to date and require the contractor to provide a CESCL for the project. The vast majority of work is upland on the site away from the creek, replacing existing ponds and infrastructure in pre-disturbed areas. Care for the environment was paramount in deciding where and how to build. WDFW will have inspectors onsite for the entire project duration assuring construction is done properly, per plan, and protecting the environment. Inspections will include WDFW staff biologists. No substantive changes are proposed to the diversion or intake facilities, which is the most environmentally sensitive area of the hatchery.

WDFW is building a completely new Pollution Abatement System designed to current WDFW and DOE standards to replace the existing system. Hatchery discharge flows will be altered to maximize the efficiency of the new system. WDFW does not challenge the assumptions made in the TMDL Report, but does want to point out that uneaten food makes up a small portion of the total organic fish waste and it may be misleading to make it a point of emphasis. WDFW is dedicated and obligated to meet the requirements of its NPDES permits and can assure full compliance with all permit conditions. WDFW is confident that the installation of the new Pollution Abatement System will result in improved discharge water quality and will actually exceed requirements of the NPDES permit. Overall, less organic material than what is currently discharged is expected to escape from the hatchery to Clarks Creek in the future.

WDFW performed some engineering-based design testing of DO (dissolved oxygen) levels for this project. DO levels at the Maplewood Springs reservoir above the hatchery intake were recorded from 8.29 to 8.51ppm (~72-75% of saturation) in September through November 2016. Salmon and steelhead are more sensitive to low DO than trout. As a result, WDFW plans to provide an aeration tower system for the entire hatchery supply. Currently the hatchery only has the ability to aerate the incubation in the hatchery building (a small portion of the total water use) and observes an increase of approximately 2ppm following

aeration. WDFW expects similar increases of DO (~2ppm) to the entire hatchery intake supply after the construction project. WDFW believes this will also correlate with improved DO levels in hatchery discharge water. The decision to aerate was preferred but not necessarily an “operational requirement.”

Thank you again for your comments.

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