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See Attached Document - Burnt Bridge Creek Advance Restoration Plan – No Net Loss and Long-Term 303(d) Impairment

Comment on Draft Burnt Bridge Creek Advance Restoration Plan – No Net Loss and Long-Term 303(d) Impairment by Peter Bracchi

I ask Ecology to directly address whether Burnt Bridge Creek is meeting the practical standard of **no net loss of ecological functions**. Ecology's no-net-loss guidance identifies the **303(d) list** as a potential **water-quality indicator** for tracking shoreline ecological conditions. That guidance also explains that conditions should be measured against a baseline and tracked over time to determine whether ecological functions are being maintained or whether stronger action is needed.

Burnt Bridge Creek has an official impairment history going back at least to **1996**, and Ecology's current listing pages show **Category 5** listings for **bacteria, dissolved oxygen, and temperature** beginning in **2004** and continuing through the current assessment cycle. Ecology's 2008 study design also confirms that the **2004 303(d) listings** for Burnt Bridge Creek were being addressed for fecal coliform, dissolved oxygen, and temperature.

The draft ARP states that Burnt Bridge Creek and its tributaries are on the **303(d) list for warm water temperature, bacteria, pH, and dissolved oxygen**. It further states that once EPA accepts the ARP, Category 5 segments would change to **Category 5r**, but the obligation to achieve standards remains. The draft ARP sets a goal of meeting **bacteria standards by 2041 and temperature, dissolved oxygen, and pH standards by 2061**.

That means Burnt Bridge Creek could remain on an impairment-recovery timeline of roughly **45 years** from the earliest verified **1996** listing history to the **2041** bacteria goal, and roughly **65 years** to the **2061** temperature, dissolved oxygen, and pH goal. Even using **2004** as the starting point for the modern Category 5 record, the timeline is still about **37 years** to the bacteria goal and **57 years** to the other goals. This long duration is a serious warning indicator that the watershed is not yet demonstrating a successful no-net-loss outcome and needs stronger measurable accountability.

For that reason, the final ARP should explicitly address **no net loss** and include **measurable indicators and interim benchmarks**, not just distant end dates. At minimum, Ecology should track and publicly report:

1. **303(d)/5r status** by parameter and reach.
2. **Temperature exceedances** and progress toward temperature compliance.
3. **Dissolved oxygen and pH compliance**.
4. **Riparian canopy, shade deficit, and restoration progress**.
5. **Stormwater retrofit implementation** and impervious-surface treatment progress.
6. **Septic correction and sewer-connection progress**.
7. Protection and restoration of **wetlands, floodplain, and groundwater/cold-water inputs** that support stream temperature and baseflow.

The ARP should also include **corrective triggers**. If periodic monitoring continues to show widespread exceedances, implementation delay, or continued loss of ecological function,

Ecology should be required to strengthen restoration actions and reevaluate whether the ARP is sufficient rather than waiting until **2041** or **2061** to determine that stronger action was needed.

In short, Burnt Bridge Creek's long-standing impaired status should be treated as a **no-net-loss warning sign**. The final ARP should say so directly and should commit to measurable indicators, interim benchmarks, and corrective actions sufficient to show that ecological functions are being protected and restored over time, not simply deferred to a future date.

That draft is grounded in Ecology's no-net-loss handbook, the Burnt Bridge Creek listing pages, the 2008 TMDL study design, and the draft ARP's own timeline and implementation language.

Reference links

- **Ecology No Net Loss Handbook, Chapter 4**
<https://apps.ecology.wa.gov/publications/parts/1106010part4.pdf>
- **Ecology Assessment & 303(d) List overview**
<https://ecology.wa.gov/water-shorelines/water-quality/water-improvement/assessment-303d-list>
- **Burnt Bridge Creek Draft ARP (May 2026)**
<https://apps.ecology.wa.gov/publications/documents/2610049.pdf>
- **Burnt Bridge Creek Listing ID 7827 – Bacteria**
<https://apps.ecology.wa.gov/ApprovedWQA/ApprovedPages/ViewApprovedListing.aspx?ListingId=7827>
- **Burnt Bridge Creek Listing ID 7836 – Dissolved Oxygen**
<https://apps.ecology.wa.gov/ApprovedWQA/ApprovedPages/ViewApprovedListing.aspx?ListingId=7836>
- **Burnt Bridge Creek Listing ID 7837 – Temperature**
<https://apps.ecology.wa.gov/ApprovedWQA/ApprovedPages/ViewApprovedListing.aspx?ListingId=7837>
- **Burnt Bridge Creek 2008 TMDL Study Design**
<https://apps.ecology.wa.gov/publications/documents/0803110.pdf>