

March 18, 2023

Danielle Edelman
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

RE: Public Comment on Draft Irrigation System Aquatic Weed Control General Permit Reissuance

Dear Ms. Edelman:

The Washington State Water Resources Association (WSWRA) appreciates the opportunity to comment on the Draft Irrigation System Aquatic Weed Control General Permit Reissuance. Please accept this document as our general comments, but we also concur with the documents submitted by our member districts individually, and thus wish to incorporate them into our comments by reference.

The members of WSWRA diligently manage the water within their jurisdiction by constantly applying sound stewardship practices. WSWRA is a trade association representing Washington irrigation districts and irrigation companies, and other agricultural and municipal water providers throughout Washington. WSWRA's members deliver water to enable billions of dollars of food production annually. Water is the lifeblood of food and fiber production in Washington, and our members strive to ensure adequate water is delivered.

It is important to remember the economic impact that delivery of irrigation water provides in Washington. The Columbia Basin Project alone delivers water to six counties, helping farmers to produce \$2.66 billion in annual crop value plus another \$2.67 billion in associated local animal production and food processing. This translates into 45,000 Washington jobs, and enough food to feed 8.9 million Americans.

The day-to-day operation of the vast network of ditches, canals, impoundments, wasteways, drains, pumps, and more takes considerable knowledge and expertise. Each district spends countless hours planning and implementing plans for the safe delivery of their precious and essential product to the farms of Washington. It is essential to highlight this level of diligence, commitment, and expertise as we provide comments on this regulatory program that dramatically effects the operation of these systems.

We appreciate the work Ecology has put into the update of this permit. Updating this lengthy and complex permit has taken significant time and required significant staff energy to complete. This also speaks to the need to carefully and methodically implement the changes embodied in the permit. The planning horizon for the current irrigation season began with the conclusion of last season. Districts busied themselves with repairs, enhancements, and other operational decisions to be ready to turn out water for the 2023 irrigation season. Implementation of this permit should be extended to allow more time for districts to modify their operations. This is a common theme you will hear from our districts. While you have made some time allowances, the sheer volume of comments individual districts have raised that need further explanation or change, should cause Ecology to pause or extend implementation.

Careful review of the permit has raised concerns related to imprecise or conflicting terms, inclusion of things outside the scope of this permit, and conflicting or questionable new signage requirements.

Each of our member districts have provided comments that include dozens of specific items. Please reference their documents for the listed page line edits that are only addressed at the general level in our comments.

I will provide just a few items here to demonstrate our level of concern and also express our commitment to helping make this effort work.

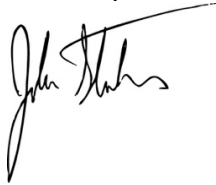
- 1) The permit should only apply to treatment of aquatic weeds, yet we see specific extension to upland vegetation. Districts have clearly responded to the inappropriateness of this expansion.
- 2) Inclusion of new education and outreach requirements go beyond this permit's authority.
- 3) New signage requirements, highlighted by adding pictograms, is confusing and will be almost impossible for districts to implement.
- 4) Precision in wording is essential, and we have observed instances of imprecise terminology (such as the common notion of IPM or integrated pest management. This is a well understood concept and term of art, but in the irrigation world affected by this permit, the only "pests" are aquatic weeds, so it really should be a narrower reference to integrated aquatic vegetation management.
- 5) We are also concerned with the specific calling out of acrolein (S4.D.1.a.i. at page 20 for instance). This product has been widely used and is considered a best practice. Ecology should not reflect value judgment into permit language.

I want to reiterate we fully support the voluminous comments made by our member districts. Their firsthand knowledge of the impact of each sentence of this permit must be taken into account as Ecology finalizes this permit. Our hope is that common sense and practicality will be woven into necessary regulatory actions so that this permit will be as practicable and implementable as possible.

We simply must have a regulatory regime in place that makes sense and provides public protection without harming the ability of irrigation districts to successfully fulfill their essential purposes.

Again, we stand ready to help make this permit work.

Sincerely,

A handwritten signature in black ink, appearing to read "John Stuhlmiller", with a long horizontal flourish extending to the right.

John Stuhlmiller
Executive Director