Quincy-Columbia Basin Irrigation District

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DEPARTMENT OF ECOLOGY

SEP 2 7 2023

WATER QUALITY PROGRAM

Marla Koberstein WA Department of Ecology PO Box 47696 Olympia, WA 98504-7696

RE: Rule Proposal (CR-102): Chapter 173-201A WAC, Outstanding Resource Waters (Soap Lake)

Dear Ms. Koberstein,

Thank you for the opportunity to comment on the Rule proposal documents in the abovereferenced matter.

Quincy-Columbia Basin Irrigation District (QCBID) will limit its comments to the Soap Lake portion of the Rule proposal documents. We appreciate the time that Ecology has previously taken to meet with QCBID to discuss and better understand irrigation and groundwater management operations around Soap Lake.

The Rule proposal would designate Soap Lake as a Tier III(B) Outstanding Resource Water (ORW). QCBID takes no position on this proposed designation, the proposed Rule language, or the SEPA determination made by Ecology. QCBID does have the following comments on the draft Rule Implementation Plan (Publication 23-10-022).

QCBID operates the Soap Lake Protective Works for the U.S. Bureau of Reclamation to remove irrigation return flows from the groundwater around Soap Lake imported to this area via the Columbia Basin Project irrigation system. QCBID notes the draft Rule Implementation Plan's favorable acknowledgement that the operation of the Soap Lake Protective Works has maintained and will continue to maintain the unique mineral properties of Soap Lake water by intercepting irrigation return waters from the ground in this area by its operation guidelines. The beneficial role that the Soap Lake Protective Works plays in helping preserve the water quality of the lake is also discussed in the Proposed ORW Draft Technical Support Document (Publication 23-10-023). QCBID understands that the Rule proposal, including the Rule itself and the Rule Implementation Plan, will not alter or otherwise impact QCBID's ongoing operation of the Soap Lake Protective Works. QCBID appreciates this being made clear in the Rule proposal documents.

QCBID supports the requirement described in the draft Rule Implementation Plan that new water resources permit applicants and change applicants demonstrate the use of water will not contribute to an increase in groundwater flow beyond the capacity of the Soap Lake Protective Works and that future permits may be provisioned to minimize the

impacts to Soap Lake and the introduction of groundwater to Soap Lake. This further recognizes the important role played by the Soap Lake Protective Works.

We appreciate Ecology's time spent researching and understanding Soap Lake and developing a Rule proposal that will seek to protect this important Washington State water resource, while at the same time recognizing the continued operations by QCBID and Reclamation.

Sincerely,

Roger Sonnichsen Secretary-Manager

cc: Norm Semanko, Attorney