



"The Green Spot of the Columbia Basin"

South Columbia Basin Irrigation District

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May 7th, 2024

Washington State Department of Ecology
Water Quality Program
Attn: Marla Koberstein
PO Box 47696
Olympia, WA 98504-7696

Dear Ms. Koberstein,

Thank you for the opportunity to comment on the proposed updates to the aquatic life toxics criteria. We also support and agree with the comments submitted by the Quincy-Columbia Basin Irrigation District, the East Columbia Basin Irrigation District, Sunnyside Valley Irrigation District, and the Roza Irrigation District.

The South Columbia Basin Irrigation District (SCBID) maintains a water distribution system with over 2,000 miles of canals, laterals and drains, delivering roughly 825,000 acre-feet of water to 233,000 acres of land each season. According to a recent economic impact study, the total farm-gate crop value from lands served by SCBID is approximately \$1.2 billion annually. One of the biggest challenges we face each season is maintaining control of aquatic vegetation. Water managers are tasked with controlling a variety of nuisance vegetation including numerous species of pondweed, Milfoil, Elodea, filamentous algae and others. Filamentous algae form dense mats on the water surface and within the water column. These algae mats break off and flow downstream clogging infrastructure such as intakes, screens and weed racks. This makes water delivery difficult, and at times, impossible. Rooted plants branch out and grow in dense stands, occupying space within the prism and reducing the hydraulic efficiency of the system. This can lead to canals over-topping or breaching, potentially causing economic impacts, and risks to life and property.

According to table 240 in the Proposed Rule Language document, the acute copper criterion for Eastern Washington will be changed from 25 µg/L to 2.5 µg/L, and the acrolein criterion will be set at 3 µg/L. The current effluent limit for acrolein in the Irrigation System Aquatic Weed Control General Permit (ISAWC Permit) is 21 µ/L. We depend heavily on aquatic pesticides that contain both acrolein and copper as active ingredients. There are currently no other available options that have the same utility as either acrolein or copper products to control nuisance vegetation in irrigation systems. If the proposed criteria are imposed as effluent limits in the ISAWC Permit, two irreplaceable tools could be effectively removed from the already limited list of options. As a result, there will likely be associated economic and safety impacts of the kind stated above.

The proposed criteria for acrolein and copper would negatively impact the beneficial uses of waters of the state, specifically for those in the agricultural industry. We kindly ask the Department of Ecology to consider the totality of the impact of these proposed criteria.

Sincerely,

John O'Callaghan
Secretary/Manager
South Columbia Basin Irrigation District