



## WENATCHEE RECLAMATION DISTRICT

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May 1, 2024

Washington State Department of Ecology  
Water Quality Program  
Attn: Marla Koberstein  
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[Marla.koberstein@ecy.wa.gov](mailto:Marla.koberstein@ecy.wa.gov)

RE: Rule Making 173-201 WAC Public Comments

Dear Ms. Koberstein,

On behalf of the Wenatchee Reclamation District, we would like to thank you for the opportunity to provide public comment on the proposed rule to revise Chapter 173-201A Washington Administrative Code (WAC), Water Quality Standards for Surface Waters of the State of Washington.

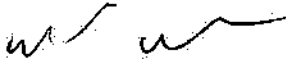
As you are aware, several of the proposed updates/revisions in Chapter 173-201A WAC are to the chemicals utilized for aquatic vegetation control by irrigation districts, including ours. We view the ability to use these control measures to maintain our water delivery infrastructure as paramount to our infrastructure management and to our overall mission as an irrigation district to provide high quality irrigation water. We do not take this mission lightly as it is critical for our community, that our farmers succeed so they may continue to feed us, this nation, and the world. As the supplier of irrigation water to over 10,000 acres in Chelan and Douglas counties, we are arguably the most critical component allowing them to continue to meet that end goal.

Managing aquatic vegetation in an irrigation conveyance system as large as ours is exceptionally challenging. It requires numerous resources and options to achieve this monumental task in a feasible manner. Every additional regulatory requirement diminishes our ability to achieve that goal, and increasingly puts our grower's viability at risk. Beyond the simple economics of the issue, many of our facilities are critical in nature; failure simply is not an option. While some may view aquatic vegetation as trivial, we can assure you, it is not. Excessive vegetation could impede flow in these critical facilities and cause washouts impacting thousands of people and causing millions of dollars of damage. Due to the location and accessibility of portions of our infrastructure, mechanical management simply is not a viable option.

While we are still able to operate as we have under the previous General Permit for Irrigation System Aquatic Weed Control, we would like to remind Washington State Department of Ecology (Ecology) that we are co-stewards of our clean water resources here in the great state of Washington. Our practices conform with existing guidance documents and permitting requirements, including the Ecology General permit, U.S. Environmental Protection Agency's guidance on Clean Water Act Exemption for Return Flow, and all of our product's Federal Insecticide, Fungicide, and Rodenticide Act labeling directions for application. As such, we hope that Ecology continues to recognize that irrigation districts, like ours, are successfully balancing the water quality needs of our growers and the conservation-based stewardship of Washington's natural aquatic resources. If we are to continue the latter, then we must maintain the ability to manage the former through the appropriate use of all the tools in the toolbox, including chemical-based vegetation management.

We thank you in advance for your considerations and look forward to working with Ecology on future water resource issues in the Greater Wenatchee region.

Sincerely,

A handwritten signature in black ink, appearing to read 'Waylon Marshall', with a stylized, cursive script.

Waylon Marshall

District Manager  
Wenatchee Reclamation District