Anonymous Anonymous

Thank you for the opportunity to comment on irrigation chapter

Bonnie Blessing
To:Ecology
re: Irrigation Water Quality review due by Dec 5, 2025
https://apps.ecology.wa.gov/publications/parts/2010008part9.pdf

I appreciate how the DOE is reviewing the VSP agricultural recommendations. I thank farmers that want to use BMPs to protect critical areas. But critical areas include streams. Streams sometimes have water. Fish need water too.

I urge DOE to add more language that does describe how important it is for any recipients of VSP to be aware of the water crisis that have developed in many watersheds. To be aware of fish and instream flow needs and the why of being careful with irrigation water. That there are other organisms on this planet that need water depth and flow and reasonable temperature. That instream flows are needed and here are some and this is why:
https://apps.ecology.wa.gov/publications/documents/0411007.pdf Why does Ecology and public funding have to go to irrigation projects that store water to send to irrigators?

Who then export overseas?
https://apps.ecology.wa.gov/continuousflowandwq/StationDetails?sta=45B070

For those in California there's this instream flow program that is so easy to refer to.
https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=150435&inline

This chapter by Ecology on irrigation measures must improve its discussion of the importance of understanding instream flows and how salmon and fish and wildlife are struggling with all the water use.

Its nice that the VSP section on irrigation discusses basic BMPs to schedule and manage irrigation water.

On page 8 or so, it mentions that irrigators should take measures to prevent negative impacts to surface or groundwater. On page 9 I suggest adding some language about this specifically as a bullet point because page 9 refers to the NRCS irrigation water management manual 449 which includes a diagram[1] that in turns recommends figuring out if there's water quantity for things like wetlands and fish and the like. Where is more info on this? Can we leave some for fish? Can we leave some for wildlife?

If people are making fortune selling ag products to other countries using our state water, can they leave some for the fish that return to our waters?

Those in WA would appreciate seeing water in streams even in summer.

Page 58 describes how Ecology manages water rights etc and says instream flows must be maintained to protect fish and wildlife etc. and that landowners don't have to apply for water rights if they're only

[1]https://www.nrcs.usda.gov/sites/default/files/2022-09/Irrigation_Water_Management_449_Network_Diagram_9_2020.pdf

using 5000 gallons per day etc etc. ***This language is wholly inadequate to describe when, where and how irrigation and domestic uses dry our streams.*** Wholly. Please spend more time on this. There are even be streams that naturally do dry and have things 'exacerbated' by human water uses. Like in Beattie Creek in the McLane Watershed of WRIA 13 we see Beattie Creek dry up from like June through October. I"m applying for a collection permit to rescue stranded fish in this creek. I'd like to know if our residential water use affects this streamflow or not. Like we've seen searun cutts in the creek. In late March. But How on earth do the searun cutthroats get out if they spawn in this creek in late March? We see litle fishes in the puddles that dry up. Is this normal? . If we see fish stranding HERE in western WA, isn't it happening there in eastern? So it seems very prudent to do a review of instream flows and irrigation use in eastern. Or we can just become a vassal of other countries who buy our alfalfa. Is this export of cow food related to beef prices in stores?

Why do we as a state have to buy water rights? Do people really have no soul? Can they relinquish if it does not impair their ability to make a living. Or do we sell out to mega corporate folks who just want to use our water and kill our fish?

Page 65 mentions irrigation efficiency methods and grants. Please discuss how in some basins this may is super important to improve efficiency to leave a little water for other fish and wildlife. But again, do we as a state have to not only subsidize irrigation when they want to expand but also buy back water rights?

'Fish' is mentioned twice. Once in reference to a study **in Kansa**s and once to Ecology's requirement to keep a few drops of water for fish. **This is wholly inadequate analysis.**

'Instream flow' is mentioned 2x. Once where it says that Ecology is supposed to leave a few drops for fish and once where it says Ecology (our state) will pay you to be more efficient. At what point, can people voluntarily leave a few drops for stranded fish. Can you describe those programs more? Here?

I know this purportedly is all voluntary. I appreciate that. Can Ecology instead of asking nicely actually totally require a few people to leave more in the stream if fish are being utterly stranded? Is this possible?

How is it that there's no reference to all the drought situations like in the Yakima basin? Even with reservoirs, its too dry for all the irrigators already?. Can we please leave some for fish?

https://www.yakimaherald.com/news/local/ecologys-water-restrictions-on-the-yakima-basin-to-lift-after-oct-31/article_5d81c8ee-5e34-4484-b656-0fa2e24fed90.html

https://www.yakimaherald.com/news/local/ecologys-water-restrictions-on-the-yakima-basin-to-lift-after-oct-31/article_5d81c8ee-5e34-4484-b656-0fa2e24fed90.htmllot better.

How is it that we can create 5 reservoirs to irrigate 464,000 acres of south central Washington? It may be time to leave some water in the creeks as well.

Our salmon runs could not be much worse.

For instance, in southeast Washington, they're pumping up the production of hatchery fish to try to increase the number of adult salmon bu this hasn't worked. Over 20 miles of the lower Tucannon river is not useful because its so hot (https://wdfw.wa.gov/sites/default/files/publications/02640/wdfw02640_1.pdf).

In Walla Walla River, its cool how they measure both water use and salmon returns at least in this website https://www.wallawallawa.gov/government/public-works/water/conservation

In summary, where is the description of how bad the irrigation system is and how we must leaave more for fish and wildlife and other stuff that people need water for?

Discuss instream flow needs for salmon.
https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=150435&inline

In summary:

Can you improve the language from things like page 65:

From:
'implementing irrigation strategies to avoid negative impacts on crop health and productivity'

To:
monitoring and maintaining instream flows so fish don't die from heat or lack of water while also supporting enough beef HERE so people here in the US can also buy some meat