

Washington State Department of Agriculture (Abigail Nickelson)

See the attached file "bbc-arp-comment-letter-wsda-final.pdf"



STATE OF WASHINGTON
DEPARTMENT OF AGRICULTURE
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Water Quality Program

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RE: Burnt Bridge ARP public comment period

WSDA appreciates the opportunity to provide comments to the Washington State Department of Ecology (Ecology) on the proposed Burnt Bridge Creek (BBC) Advanced Restoration Plan (ARP).

As a State Lead Agency (SLA), WSDA has delegated authority from EPA to implement the Federal Insecticide Fungicide and Rodenticide Act (FIFRA). Our Agricultural Environmental Services (AES) Division regulates and enforces the registration, distribution, use, and disposal of pesticides to protect human health and the environment in Washington State. The AES Division also administers the Natural Resources and Agricultural Sciences (NRAS) program. NRAS scientific programs research the occurrence of pesticides in surface waters and groundwater, agricultural land use practices, soil health, and pesticide use patterns across various crop types. In addition to research projects, NRAS pesticide stewardship staff scientists work with communities across the state to gain insight into mitigation practices and coordinate projects with conservation districts, university researchers and other agencies. WSDA has been monitoring for pesticides at BBC since 2017. The comments below are intended to address misstatements using WSDA data.

WSDA proposes the following revisions and recommendations to the data summary describing 2022 pesticide monitoring data in BBC:

1. Original: **"When multiple pesticides are detected simultaneously, the harmful effects can combine to lower dissolved oxygen;"** Page 41

Proposed: *"When multiple pesticides are detected simultaneously, the harmful effects can combine;"*

Recommendation: Remove “to lower dissolved oxygen” from this sentence. Additive toxicity for compounds with the same mode of action is well known and can have a direct effect on organisms. However, multiple pesticides in the water do not directly contribute to lower dissolved oxygen. The sentence as currently written suggests that compounds in the water directly affect dissolved oxygen levels and that is beyond the scope of the data.

2. Original: **“Multiple pesticides combined negatively impact water quality by reducing aquatic plant and macroinvertebrate populations, creating aquatic ecosystem imbalances, and lower dissolved oxygen levels.”** Page 41

Recommendation: Remove this sentence. The indirect effects claimed in this sentence are beyond the scope of the data. While the levels of pesticides in the water were measured, plant abundance, macroinvertebrate abundance, and ecosystem diversity were not. A toxic unit analysis on these data shows that additive toxicity, for compounds below criteria individually, was below the acute threshold for plants, fish and invertebrates.

3. Original: **“When multiple pesticides are detected simultaneously the harmful effects can combine and contribute to die-off in aquatic plants, lower dissolved oxygen levels, and reduce macroinvertebrate populations.”** Page 164

Recommendation: Remove this sentence. See #2 above.

4. Original: **“Two noted chemicals of the seven Pesticides of Concern in BBC are Imidacloprid and Diuron.”** Page 41

Proposed: *“One chemical was found to be a Pesticide of Concern in BBC, imidacloprid.”*

Recommendation: Remove “seven.” This is incorrect, as of the 2022 dataset, BBC had one Pesticide of Concern, imidacloprid.

In addition, remove references to diuron as a Pesticide of Concern in this sentence and the following paragraph. EPA updated the Aquatic Life Benchmark in 2025 to reflect an arithmetic error. With this update, the benchmark for plants changed from 0.13 µg/L to 13 µg/L. This correction has changed WSDA’s Assessment Criteria. All mentions of diuron being a pesticide of concern at BBC for 2022 should be removed. WSDA is in the process of updating all factsheets and reports. To see the corrected diuron benchmark, and the year it was updated, visit EPA’s webpage for the Aquatic Life Benchmarks at: <https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/aquatic-life-benchmarks-and-ecological-risk>.

5. Proposed Addition: *“Strategies that reduce soil erosion and nutrient movement often provide dual benefit of reducing the movement of other compounds, including pesticides.”*

Add this sentence to the end of data summary on Page 41. Nutrients and soil erosion/sediment are subject to the same physical laws that all other chemicals are, which includes pesticides. Practices to minimize the movement of nutrients and soil erosion can reduce the levels of those things as well as pesticides. EPA has produced a document reviewing the measurable reduction in pesticide drift and runoff as a part of an effort to reduce pesticide exposure to endangered species by way of mitigation practices. The document is titled Ecological Mitigation Support Document v2.1 and can be found at <https://www.epa.gov/system/files/documents/2025-04/ecological-mitigation-support-document-v.2-1.pdf>. Many of these practices are similar or the same as those offered by USDA’s Natural Resource Conservation Service and many other conservation entities.

Along with these proposed revisions and recommendations, WSDA is happy to offer a detailed written or presented data summary for the purpose of supporting revisions of this document. Given that WSDA data used in this document is published information, Ecology should reference any WSDA materials used to complete this report. Describing all known data for BBC is important to understanding the overall health of the watershed. Again, we appreciate the opportunity to comment and we look forward to more discussion and work on these complex topics.

Sincerely,



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