



*"The Green Spot of the Columbia Basin"*

# South Columbia Basin Irrigation District

OFFICE: 1135 E. HILLSBORO, SUITE A

TELEPHONE: (509) 547-1734 • FAX: (509) 547-8669 • PO BOX 1006 • PASCO, WASHINGTON 99301

May 13, 2015

Washington Department of Ecology  
Water Quality Program  
PO Box 47600  
Olympia WA 98504-7600

To Whom It May Concern,

Thank you for the opportunity to comment on the Proposed Water Quality Assessment and 303(d) List using freshwater data for Washington State. The South Columbia Basin Irrigation District has the following comments:

1. Through talking with USBR staff it is our understanding that data entered into STORET is raw data and has not undergone a QA/QC check to validate results. Therefore this data should not meet the Department of Ecology’s Program Policy 1-11, Chapter 2, Ensuring Credible Data for Water Quality Management. This data should be removed from listings within SCBID and those listing reassessed using only data that meets Policy 1-11.

2. In an effort to effectively represent the intended use of the water delivery systems within SCBID, we would like to see all our facilities labeled as “canals/ditches”. Currently, many are incorrectly labeled as “rivers/streams”. Our facilities are manmade and function to deliver irrigation water therefore “canal/ditch” accurately describes their purpose and use. Additionally, we do not believe the default beneficial uses to which our waterways are assigned are appropriate given their intended purpose to supply irrigation water. The following table contains those Assessment Unit IDs in the proposed 303(d) list that are misidentified as rivers/streams. Additionally, proposed Listing IDs 72086 and 73306, which do not have an Assessment Unit ID, should also be labeled as canals/ditches. This is by no means an exhaustive list and only represents a small portion of our canals.

Assessment Unit ID

17020016000364	17020016000952	17020016001775	17020016003682	17020016005490
17020016000623	17020016000989	17020016001833	17020016003720	17020016005516
17020016000703	17020016001084	17020016001894	17020016003970	17020016005576
17020016000827	17020016001158	17020016001933	17020016003995	17020016005635
17020016000833	17020016001195	17020016001985	17020016004070	17020016007398
17020016000871	17020016001384	17020016002040	17020016004123	17020016007400
17020016000908	17020016001474	17020016002044	17020016004243	17070101001402
17020016000914	17020016001490	17020016002485	17020016005469	17070101001404
17020016000927	17020016001492	17020016003410	17020016005471	17070101001406
17020016000931	17020016001732	17020016003644	17020016005477	



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3. Assessment Unit ID 17020016001833 has been assessed against an incorrect standard. Our canals fall into the default beneficial uses according to the current Surface Water Quality Standards and so this assessment unit should have been compared against a temperature of 17.5°C and a Dissolved Oxygen level of 8 mg/L. Because of this, proposed listing ID 77688 for Dissolved Oxygen should be removed. Also proposed Listing 73320 for temperature should be removed from Category 5 as there are only 2 excursions using the data from the original proposed listing.
4. The following proposed listings have been incorrectly mapped or placed on the wrong Assessment Unit or canal. In some instances, correctly mapping and identifying the canals leads to duplicate listings that should be combined resulting in fewer overall listings.
  - a) Assessment Unit 17020016000931 should be mapping the WB 5K. This canal flows southwest from Hollingsworth Rd. The portion of the currently mapped assessment unit that travels South is a separate canal.
  - b) Proposed listings 71542, 72444, 77866, 70598, and 733324 are on Priest Rapids Wasteway. This canal flows through a series of ponds to the North of the current line, not west as currently mapped.
  - c) Proposed listings 70590, 71536, 72445, and 73316 are on Saddle Mountain Wasteway and should be mapped on an assessment unit running south to Saddle Mountain Lake. The canal they are currently placed on is a tributary to Saddle Mountain Wasteway and not the canal from which samples were taken. Further, listings associated with USBR site 096 should be placed on this same assessment unit to Saddle Mountain Lake. These are proposed listings 16071, 15156, and 16084 which are incorrectly mapped on a portion of canal to the North. Proposed listings 70591, 70592, 72435, and 77863 are mistakenly mapped to the Northeast in the Wahatis Wasteway and not in Saddle Mountain Wasteway.

Correctly mapping these sites will result in duplicate listings. Proposed listing 16071 should be combined with proposed listing 73316. Proposed listing 15156 should be combined with proposed listing 77863. Proposed listing 16084 should be combined with proposed listings 70590 and 70591. Proposed listing 72435 should be combined with proposed listing 72445.

- d) Proposed listings 8293, 8292, and 8991 which should be in the Ezquatzel Coulee have been incorrectly placed on another canal. The Esquatzel Coulee runs North/South crossing Sheffield road and parallels the Burlington Northern railroad line. The assessment unit for these listings should run South from Sheffield road. Changing the way this is mapped results in 3 duplicate listings. Proposed listing 8291 should be combined with 16065. Proposed listing 8292 should be combined with proposed listing 16090. Proposed listing 8293 should be combined with proposed listing 8290.

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- e) Proposed listings 15157, 15169, 16069, 45408, 47919, 51187, 71544, and 73309 all use data from the same location, but are mapped at separate locations. The correct assessment unit is the one associated with listing 45408. Correcting this mapping error will result in duplicate listings. Proposed listing 15157 should be combined with proposed listing 47919. Proposed listing 15169 should be combined with proposed listing 51187. Proposed listing 16069 should be combined with 73309.
- f) Assessment Units 17020016005576, 17020016007400, 17020016005490 should be mapped as one unit. These units are on the Potholes East Canal and no other canals enter this waterbody in this section of the canal. Rectifying this will result in several duplicate listings. Proposed listing 77695 should be combined with proposed listing 77871. Proposed listing 16064 should be combined with proposed listing 73334. Proposed listing 16080 should be combined with proposed listings 70607 and 70610.
- g) Assessment units 17020016003970, 17020016007398 should be mapped as one unit. These units are in the EL 68D Wasteway and are only separated by Washington Highway 17. Changing this assessment unit will result in numerous duplicate listings. Proposed listing 40823 should be combined with proposed listing 70609. Proposed listing 70824 should be combined with proposed listing 73333. Proposed listing 40822 should be combined with proposed listing 77872. Proposed listing 74390 should be combined with proposed listing 74411.
- h) Proposed listings 16073, 16077, 70603, and 77869 should all be placed on the WB 5 canal. Currently proposed listings 16073, 16077, 70603, and 77869 are mapped on the Wahluke Branch Canal. Instead, these should be placed on Assessment Unit 17020016000927. Making this correction will result in duplicate listings. Proposed listing 16073 should be combined with proposed listing 73311. Proposed listing 16077 should be combined with proposed listings 70603 and 70586.

5. Several of our canals in the Proposed Assessment are misidentified or unnamed. Please see the table on the following page for our submitted revisions.



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Listing ID(s)	Assesment Unit	Listed Name	Revised Name
71544, 47919, 73309	17020016003644	A15 Wasteway	PE 16.4WW
71540, 72442, 16089, 16074, 16072	17020016002040	Ektopia Branch Canal	EBWW1
8296	17020016000908	Mattawa Wasteway	Mattawa Drain
77689, 70596, 73322	17020016001933	PE 55 Wasteway	PE 55
71529, 77685, 70854, 73310	17020016000827	PE 59.4 Wasteway	PE 59.4
71551, 77693, 70606, 73331	17020016005516	PE 66 Wasteway	PE 66
71534, 77861, 70588, 73315	17020016001195	Potholes Canal	Pasco WW
8297, 72436	17020016000833	Potholes Canal	Potholes East Canal
72086, 73306	T12N R29E S15	Unnamed Canal	PE 46.2
70599	17020016003410	Wahluke Branch Canal 10 Wasteway	WB 10 Wasteway
77686, 73314	17020016001084	WB 10WW	WB 10
71531, 70586, 73311	17020016000927	WB 5 Headworks	WB 5
72404, 77694, 7332	17020016005635	WB 5G Wasteway	WB 5G
73312	17020016000931	WB 5K Headworks	WB 5K
71631, 72327, 77732, 70940, 74044	17070101001402	High Lift Canal	BP 1
71632, 72328, 77917, 70941, 74045	17070101001404	Unnamed Canal	BP 2
74046, 70942, 77918, 72329, 71633	17070101001406	Unnamed Canal	BP 3



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Again, we appreciate the opportunity to comment on the Proposed Water Quality Assessment and 303(d) List for Washington State. If you have any questions, please contact me.

Thank you,

Stephanie Shopbell  
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