



CONSOLIDATED DIKING IMPROVEMENT DISTRICT NO. 1

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DISTRICT BOARD OF SUPERVISORS: RAY E. CALDWELL, CHAIRMAN • BILL HALLANGER, VICE-CHAIRMAN • SHERRY BEAN, SECRETARY

October 12, 2010

Kathy Hamel, Water Quality Program
Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

SUBJECT: Aquatic Plant and Algae Management General Permit

The Board of Supervisors of Consolidated Diking Improvement District No. 1 (CDID #1) of Cowlitz County submits the following comments regarding the Aquatic Plant and Algae Management General Permit. CDID #1 recognizes that aquatic herbicides are a necessary tool for the management of aquatic weed growth. CDID #1 utilizes mechanical and aquatic herbicide methods to control noxious weed growth in our ditch system. With over 35 miles of ditches to maintain a single method of treatment is not practical, effective or feasible.

Over the past several years CDID #1 has experienced invasive weed growth in our extensive ditch system in spite of aggressive aquatic weed management efforts. This is due in part to the fragmentation that occurs during mechanical harvesting of the noxious weeds such as: Parrot Feather, Water Primrose, Brazilian Elodea, Eurasian Milfoil, Coontail and Fanwort.

In our experience the most effective method for addressing noxious weed growth is aquatic herbicide treatment. Beginning in 2005 CDID #1 implemented an aggressive two year aquatic herbicide treatment program followed by annual monitoring and spot treatment to a portion of our ditch system known as Ditch No. 6 West. Currently, this portion of the CDID #1 ditch system and the down stream pump station requires the least amount of attention during a high water event due to the success of this program.

The District's ability to integrate aquatic herbicide use in the battle to control noxious weed growth is a budgetary, environmental and public safety issue. In our mission to provide flood control protection to the communities of Longview and West Kelso it is increasingly burdensome to manage noxious weed growth in our ditch system. Countless hours are spent each summer and fall harvesting noxious weeds from the ditches in preparation for the rainy season (see attached photograph illustrating the invasive weed growth).

The ditches of CDID #1 have a dual function, acting as a stormwater conveyance system and as a storage reservoir for intense rainfall. It is essential that all ditches of CDID #1 remain free of noxious aquatic weeds in order for stormwater to flow through the system. When the water level rises as a result of rain, aquatic weed matter

interferes with the flow of stormwater and can cause flooding. During a storm event it is necessary to man the pump stations around the clock to ensure the aquatic weed matter does not plug the screens and cause potential damage to the pumps.

We ask Ecology to fully consider the economic and public safety impacts of any new requirements, which would ultimately lead to increased costs. As with most other public agencies our budget is strained to the limit and any new cost would adversely impact the District's ability to manage noxious aquatic weeds.



(Invasive growth of Waterprimrose in CDID #1 Cutoff Slough / October 2010.)

Note this ditch is approximately 45 feet in width. Mechanical harvesting of the noxious aquatic weeds at this location occurred during the fall of 2008.)

Thank you for your consideration.

Ray E. Caldwell, Chairman
Bill Hallanger, Vice-Chairman
Sherry Bean, Secretary

Judi A. Strayer

CDID #1 Board of Supervisors
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