

March 30, 2012

Melissa Gildersleeve, Manager
Watershed Management Section
Water Quality Program
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504

RE: Draft Irrigation System Aquatic Weed Control NPDES General Permit

Dears Ms. Gildersleeve,

Thank you for the opportunity to comment on the proposed renewal of the Irrigation System Aquatic Weed Control NPDES and State Waste Discharge General Permit. The Washington State Water Resources Association (WSWRA) is the coordinating agency for irrigation districts in Washington State. Our members operate thousands of miles of canals for the delivery of irrigation water to farms across the state. The continued use of aquatic pesticides is vital to the efficient delivery of irrigation water to farms that account for over 2 billion dollars worth of crop production each year.

The WSWRA supports the renewal of the Irrigation System Aquatic Weed Control NPDES General Permit. We have worked closely with Ecology to complete a fish study addressing the impact of the endothall product Cascade on salmon smolts. The report confirmed that Cascade use at its label rate of 5 ppm does not impact salmon smolts negatively. This report serves as the basis for raising the Cascade discharge limit. We also support the increase of the discharge limit for the endothall product Teton to match other state issued NPDES permits.

WSWRA members are concerned that the proposed future elimination of acrolien from the aquatic weed control toolkit could pose problems for irrigation water deliveries. It is important to the districts to continue to have all available tools to address water delivery issues associated with aquatic weed control. At this point it is impossible to predict the efficacy of endothall treatments on aquatic weeds in irrigation canals. The districts will work diligently to control aquatic weeds using endothall and other products but these products may not be sufficient to address all of the varied water delivery conditions. During the 10 years that the districts have used acrolien under the state permit there have been no significant issues that would suggest that the acrolien should be eliminated from the list of available aquatic pesticides. Under this proposed permit the burden is placed on the districts to prove the need to continue using acrolien, it seems only logical that Ecology should be prepared to shoulder the burden of demonstrating why acrolien use should be curtailed in Washington State.

We appreciate the amount of time and effort you have put into renewing this permit and the cooperation we have had in developing our fish study and assessing the results. We look forward to continuing this cooperative relationship and working closely in the future to investigate the continued use of acrolien.

Sincerely

Thomas G. Myrum,
Executive Director and General Counsel
Washington State Water Resources Association

Morgan, Laurie (ECY)

From: Tom Myrum [tmyrum@wswra.org]
Sent: Monday, April 02, 2012 8:02 AM
To: Morgan, Laurie (ECY)
Subject: Aquatic Weed Permit comments, 2012 March 30, Melissa Gildersleeve
Attachments: Aquatic Weed Permit comments, 2012 March 30, Melissa Gildersleeve.docx

Laurie, here are the WSWRA comments on the irrigations systems permit. TOM