



United States Department of the Interior

BUREAU OF RECLAMATION

Ephrata Field Office
P. O. Box 815
Ephrata, Washington 98823

IN REPLY REFER TO:
EPH-2602
RES-3.20

SEP 10 2008

DEPARTMENT OF ECOLOGY

Mrs. Julie Robertson
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

SEP 12 2008
WATER QUALITY PROGRAM

Subject: Proposed Industrial Stormwater General Permit, Columbia Basin Irrigation Project (Project), Washington

Dear Mrs. Robertson:

We appreciate the opportunity to review and comment on the proposed Industrial Stormwater General Permit.

It is the Bureau of Reclamations policy that "Emphasis shall be placed on discouraging the discharge of non-agricultural type waste water into the Area's [Upper Columbia Area's] natural and constructed irrigation infrastructure, and/or tributaries." Reclamation has a permitting process for proposed discharges into our facilities. A permit must be obtained from Reclamation and the managing irrigation district prior to any discharge.

Two of Reclamations largest projects are within the Central and Eastern Washington regions. Section 402 of the Clean Water Act (CWA) "does not require a permit under this section for discharges composed entirely of return flows from irrigated agriculture, nor shall the Administrator directly or indirectly, require any State to require such a permit."

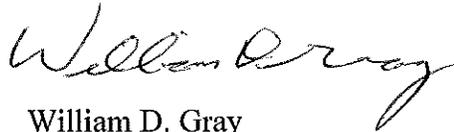
Of primary concern to Reclamation and the operating entities is preservation of the agriculture return flow exemption under Section 402 (I) 1 of the CWA. Reclamation will not approve discharges which may negatively affect this exemption. Therefore, a fundamental prerequisite to obtaining Reclamation's approval for any waste water discharge is the proponent's full compliance with the requirements of the CWA and issuance of a National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge (SWD) permit when required by other law. Prior to approval, Reclamation and the operating entities must be assured that the exemption for agricultural return flows will not be adversely affected by the proposed discharge.

Reclamation, as the owner, and the Columbia Basin Irrigation Districts, as the managers and operators, of a constructed water delivery system, are concerned with the outcome of this permit due to the possible constraints which may be placed upon the operation and maintenance of our irrigation facilities. The constraints referred to are; the ability to maintain a high standard for the water quality, as well as the capacity of the facilities for the proposed storm water discharge.

The policy is based on protecting the Project's water supply and maintaining the authorized Project purposes. In line with this, there is growing awareness regarding water supply and agricultural production. The Washington State Department of Agriculture's Good Agricultural Practices (GAP) program is an example of this increased awareness. The GAP program requires farmers to certificate the quality of the product produced by submitting water quality sample results of the water used to irrigate their crops.

If you have questions or need additional information regarding these comments please contact Ms. Gina Hoff, Water Quality Specialist, at 509-754-0254 or by e-mail at ghoff@pn.usbr.gov.

Sincerely,



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Assistant Area Manager

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