EAST COLUMBIA BASIN IRRIGATION DISTRICT

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December 17, 2010

Becca Conklin
Washington Department of Ecology
Surface Water Quality Standards
P. O. Box 47600
Olympia, WA. 98504

Re: Surface Water Quality Standards Triennial Review

Dear Ms. Conklin:

The East Columbia Basin Irrigation District is one of three irrigation districts operating the U.S. Bureau of Reclamation's Columbia Basin Project located in eastern Washington. The CBP is one of the largest agricultural irrigation projects in the Western United States, irrigating about 670,000 acres in central Washington State.

Dominating the geographical setting of the "Big Bend Region," the Project extends north to south from the Ephrata-Soap Lake area to the Tri-Cities, and east to west from Connell and Warden to the Columbia River. Water for the Project is pumped from Franklin D. Roosevelt Lake (Columbia River), behind Grand Coulee Dam, into Banks Lake. From Banks Lake, the Main Canal carries water to the northern end of the Project, where secondary canals deliver water throughout the irrigated area. The Potholes Reservoir, in the central portion of the Project, captures return flows from the northern Project area and, in turn, provides water to the southern Project area.

The hydrology of the region is dominated by the irrigation system as nearly all surface water is contained in canals and agricultural drains. Land use is predominantly irrigated and dry land agriculture and range land. Major crops grown in the basin include alfalfa, wheat, field crops, corn, potatoes, and orchard. Geology is described as varied thickness of sediments over basalt forming topography of nearly flat valleys with bluffs separating drainage basins. The East District supplies water to 152,000 plus acres in the Moses Lake, Warden and Othello areas. Irrigation water flows through the system from late March to late October.

There are several waterways within the East District's service area that are included on Ecology's 303(d) list. None of the 5 categories developed for listing water quality are appropriate for constructed waterways.

The East District believes Ecology should seriously consider adding one or more additional categories to apply to artificial situations that apply to "Constructed Waterways". One possibility would be to add a category for this condition for which 303(d) listings and subsequent TMDLs would not be required. Another, broader approach could be to split Category 5 into two subcategories, one of which would require a TMDL and one which wouldn't require a TMDL. This solution would eliminate Ecology wasting time and resources conducting TMDLs for

artificial situations. It is well known that temperature TMDLs can be a resource intensive and time-consuming endeavor with limited results.

The numeric temperature criteria limits in the Washington State DOE water quality standards for rivers and streams are designed to protect cold water species, in particular salmon and trout, and are not appropriate for the warmer climates that Eastern Washington experiences nor are they appropriate for manmade irrigation facilities and waterways on the Columbia Basin Project. The criteria for temperature listing assumes that human influences have contributed to the exceedance, however, the District's have collected water quality data from the Columbia River that has proven the water is already out of compliance with temperature standards before the water enters our irrigation facilities (June-October). Local temperatures can and do influence the ability of a water body to meet established water quality criteria for temperature without any human activity involved.

Man-made irrigation facilities have not been addressed in the State Water Quality Standards. There needs to be a separate standard developed for these systems. These facilities are unique. They were not designed or constructed to support aquatic life. They were designed to deliver irrigation water to our water users in an efficient and dependable manner with the operation and maintenance activities required and are at odds with the existing standards.

The development of standards that address conditions that can be realistically attained would seem to be a better use of resources and would shield irrigation water users from needless litigation. It is aggravating to be blacklisted for pollutants that are beyond the District's control. Temperature is a non point source pollutant. Public perception of having waters on the 303(d) list can be negative. Having these types of listings also needlessly adds to the total number of 303(d) listings. Water quality standards should contain a mechanism to account for when less-than-optimal conditions naturally occur on a water body.

The question is, why is it so important that man-made canals and conveyance systems be regulated by water quality standards that are not designed to address the actual conditions that exist by their creation? Most waterways will continue to be listed for temperature. There is nothing that can be done to lower summertime ambient air temperatures in eastern Washington. The District appreciates the opportunity to provide comments and is hopeful that Ecology will consider adding an additional irrigation standard to the state water quality standards.

Sincerely,

Elayne M. Fuller

Elayne M. Fuller
Water Quality Supervisor

EMF:wl

cc: Hugh McEachen, SCBID
Betsy Jordan, QCBID