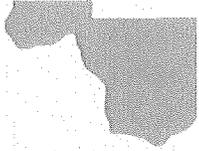


"The Green Spot of the Columbia Basin"



South Columbia Basin Irrigation District

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December 17, 2010

Transmitted Via Email

Ms. Becca Conklin
Washington State Department of Ecology
PO Box 47600
Olympia WA 98504-7600

RE: Comments to Water Quality Standards Triennial Review

Dear Ms. Conklin –

The South Columbia Basin Irrigation District appreciates the opportunity to submit comments as part of the Surface Water Quality Standards Triennial Review. SCBID is one of three districts operating the Columbia Basin Project that serve over 671,000 irrigated acres in Eastern Washington.

Over the last several years, SCBID has expressed concerns and provided comments about the current designated use criteria being applied to our delivery systems as a basis for 303(d) listings. Waters conveyed through the man-made canal system of the CBP do not fit well into any of the designated use-based categories currently in place. The majority of Project waterways operate as seasonal water bodies, designed solely for the purpose of water delivery for agricultural purposes. A difference should be noted between naturally occurring water bodies, and man-made irrigation facilities. It is disappointing that Ecology hasn't added an additional category to apply to artificial systems, like those present in the CBP.

Irrigation facilities were constructed as a water conveyance system for on-farm water delivery. While there are some exceptions, such as large reservoirs which may serve several purposes, they were not constructed to support aquatic life. The general fresh water use criteria applied for temperature (Salmonid Spawning and Rearing, WAC 173-201A-600) is unrealistic. The SCBID is located in a semi-arid desert environment in South Eastern Washington. As the ambient air temperatures increase through the irrigation season, water temperatures will also increase.

Aside from environmental factors, operational and maintenance procedures required to ensure water delivery to our farmers, make cool water temperature requirements unattainable. Many of our canal and laterals are relatively shallow and cement lined. Our Integrated Vegetation Management Plan is designed to make water deliveries as efficient as possible and this includes keeping banks and canals relatively clear of vegetation that would reduce flow. Their flow is almost entirely regulated by our operations as we make adjustments due to the water demands of our farmers. It is unreasonable to expect that these canals can achieve the same temperature water quality standards as natural water bodies.

These systems do not operate as natural water bodies and it is unjustifiable to group them together under general water quality standards aimed at improving naturally occurring lakes, streams, and rivers within our state. SCBID would like Ecology to consider making a separate use category for man-made irrigation systems, recognizing the differences between these two distinct kinds of water bodies.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Solem", written in dark ink.

David Solem
Secretary/Manager