



DEQ Response to Comments

2000-J NPDES general permit renewal

2000-J is a statewide water quality general permit for pesticide use in irrigation systems. This permit expired on Sept. 30, 2025 and was administratively continued. DEQ accepted public comment on the proposed general permit renewal from May 4, 2026 through June 18, 2026. DEQ held a virtual public hearing on June 15, 2026.

List of Commenters

The following commenter submitted written comments or provided comments during the public hearing.

- April Snell, Executive Director, Oregon Water Resources Congress

Public Comments

Public comments received are organized below, with DEQ's response following each comment. Original comments are on file with DEQ.

Supports regulating the discharge under a general permit. A general permit provides its members with a regulatory framework that allows irrigation districts to operate efficiently. Consider the timing of the effective date of the renewed permit. Avoid confusion that could result when transitioning a permit holder to the renewed permit in the middle of its operating season.

The effective date of the general permit will begin November 1, 2026.

Allow irrigation districts to effectively manage and maintain their water delivery operations. Responsible use of aquatic herbicides is essential to the operation of OWRC members to keep their canals and water delivery infrastructure free of aquatic vegetation to ensure the efficient delivery of water.

This permit requires operators to use pest management measures to minimize the discharge of pollutants from the application of pesticides. Pesticide application is a pest management option that is regulated by following the label and through other practices. No changes to the permit are made in response to this comment.

Keep the operational needs of irrigation districts and evolving regulatory landscape in mind when finalizing the permit. As mentioned in an [Oregon Water Resources Department publication](#) an example of wasting water by definition might include a failure to keep ditches free from weeds.

This permit requires an operator to use pest management measures which include identification and surveillance of a pest problem to determine an action level is met. Recordkeeping is required on surveillance methods, action thresholds, and pest management methods used for each treatment area. As described on page 14 of the fact sheet for this permit, nuisance algae and plant growth that restricts water flow such that it creates a backwater area that tops the bank of a canal can be considered a pest problem. Reduced water

supply for operational needs can also be considered a pest problem. No changes to the permit are made in response to this comment

DEQ Correction

On page 23, in Schedule B.6.f.ii, DEQ corrected a reference to Schedule A to read Schedule A.6.d.

Non-discrimination statement

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