

OKANOGAN COUNTY NOXIOUS WEED CONTROL BOARD

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Aquatic Plant & Algae General Permit comments

October 14, 2010

The Okanogan County Noxious Weed Control Board has reviewed the draft permit and accompanying documents, we have the following comments:

Page 7 – ii – 1 The restriction to 10’ on either side of a dock or 20’ per lot is inappropriate. Dilution and movement of applied chemicals may not provide adequate control of weeds, to allow for safe recreation. Private property owners should have the right to ensure safety of their shoreline.

Page 9 – C “Activities That May Not Need Coverage Under This Permit” is vague language. Activities that do require permit coverage must be stated as such to negate the possibility of an illegal application. The vague language leaves the issue open to interpretation.

Page 11 – 7 Mailing or delivering notices to potentially affected residents can cause a huge burden on the applicant. “Residents” is vague language and it may prove an onerous burden to determine exactly who is to receive notice. I suggest instead that notices be mailed or delivered to legally registered property owners that might potentially be affected by an application. I do agree that limiting the notification to those within a quarter mile of the application site is adequate notice.

Pages 14-16 Application of Products. Restricting application products to those currently listed does not allow for future products that may become available. New products will become available that may provide better control, lessen off target plant impacts, have lower use rates, and limit potential unnecessary impacts to fish and other wildlife utilizing the water body. Restricting products to those listed will also require constant revisions to the permit that are unnecessary given current workload burdens at DOE.

Page 18 – D – 2&3 The last sentence of the paragraph states “on a time schedule agreed to by all parties” This is totally unrealistic. This would allow for one person to stop the application. This needs to be worded to allow for a majority of participants in the project area.

Page 18 – D – 4 WDFW treatment windows. I suggest that if WDFW may periodically update the table, then written notice should be sent to permit holders notifying them of potential impacts to projects. If this is not an option, the table should be restricted from review for a given field season.

We appreciate the opportunity to comment on the draft permit and look forward to seeing the revisions in the final draft. Should you have any questions regarding the above comments, please do not hesitate to contact our office at the numbers provided.

Sincerely

**Anna Lyon
OCNWCB, Coordinator**