

Roza-Sunnyside Board of Joint Control

P.O. Box 810 ■ Sunnyside, WA 98944 ■ (509) 837-5141

March 30, 2012

Laurie Morgan
Water Quality Program
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

**RE: Sunnyside Valley Irrigation District Permit #WAG-991006,
Roza Irrigation District Permit #WAG-991008
Comments on Draft permit WAG-991000, 2012-2017.**

Dear Ms. Morgan:

■
Jerry
Haak
Chairman

Thank you for the ability to comment on the Draft Irrigation System Aquatic Weed Control, NPDES and State Waste Discharge General Permit of February 15, 2012. The Roza Irrigation District (Roza) and Sunnyside Valley Irrigation District (SVID) are represented by the Roza Sunnyside Board of Joint Control (RSBOJC) and have the following comments:

■
Doug
Simpson
Vice
Chairman

S5. 7. For acrolein applications. *“Ecology will not allow the use of acrolein after the expiration of this permit unless the permittee can demonstrate that the use of acrolein, in consultation with Ecology, is necessary for the feasible control of aquatic vegetation to meet irrigation demand and to protect public safety.”*

■
Ron
Van
Gundy
Secretary

Roza and SVID will continue to use herbicides that include the active ingredient Endothall to control aquatic weeds. The District's hope this less toxic herbicide will provide optimum aquatic weed control with the permitted increased concentration dose. Both Districts must have the ability to optimize herbicides to their individual aquatic weed control needs. This section of the permit suggests that a permittee may request the use of acrolein and Ecology would have the ability to deny that request. Please describe the process of approval or denial for a permittee's request to use acrolein.

■
Lori
Brady
Treasurer

Irrigation districts have used acrolein responsively and safely for decades in the State of Washington. A district may find weather conditions change rapidly, Endothall products are not effective, and an acrolein application is required for a quick fix to a canal or lateral with heavy infestation of aquatic weeds. Heavy infestations of weeds could lead to canal or lateral failure which may lead to loss of life and destruction of property and crops. We hope the State of Washington

fully understands the potential liability for damages if the districts do not have effective herbicides available for use. Irrigation Districts need every available tool in their toolbox to control aquatic weeds and put water to beneficial use, now and in the future.

Sincerely,

p.p.

A handwritten signature in cursive script that reads "Matthew Mogan".

Elaine S. Brouillard
RSBOJC Water Quality Specialist
509-837-6980 x1005
brouillarde@svid.org

Morgan, Laurie (ECY)

From: Morgan, Matt [morganm@svid.org]
Sent: Friday, March 30, 2012 10:50 AM
To: Morgan, Laurie (ECY)
Cc: Brouillard, Elaine
Subject: RSBOJC comments for permit WA0991000
Attachments: RSBOJC comments for permit WA0991000.pdf

Hi Laurie,

Attached are RSBOJC comments for the Irrigation System Aquatic Weed Control permit. I am sending this on behalf of Elaine Brouillard.

Sincerely,

Matt Morgan
RSBOJC Water Quality Technician
Sunnyside Valley Irrigation District
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509-837-6980 ext. 1017