

Roza-Sunnyside Board of Joint Control

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Department of Ecology
Water Quality Program
PO Box 47600
Olympia, WA 98504-7600
Attn: Becca Conklin

RE Chapter 173-201A WAC, Water Quality Standards for Surface Waters of the State of Washington

Dear Ms. Conklin:

Thank you for the opportunity to comment on the Water Quality Standards for Surface Waters of the State of Washington proposed rule language.

Doug Simpson
Chairman

Ric Valicoff
Vice Chairman

Scott Revell
Secretary

Lori Brady
Treasurer

The Roza-Sunnyside Board of Joint Control (RSBOJC) is composed of the elected boards of the Roza Irrigation District and the Sunnyside Division Board of Control. Irrigation districts convey water for agricultural use. There is no recreational use allowed on irrigation facilities. The Washington State recreational criteria of swimming, wading, boating or surfing is not legally allowed on or within the irrigation district facilities. All facilities and roads are properly posted with no trespassing or swimming signs.

The RSBOJC proposes the *E. coli* organism geometric mean be **126** CFU or MPN per 100 mL and the statistical threshold value (STV) be **410** CFU or MPN per 100 mL for **agricultural use** water in the State of Washington. These values will harmonize the State of Washington with the Federal Drug Act (FDA) Food Safety and Management Act (FSMA) for agricultural use water.

The proposed *E. coli* recreational use geometric mean of 100 CFU or MPN and the STV of 320 CFU or MPN is based on reducing human health concerns while swimming, wading, boating or surfing. Irrigation districts by law do not allow these human activities on their facilities. Agricultural use water, which is not recreational use, harmonizes with the FDA FSMA agricultural water standards.

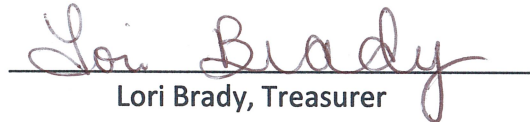
In addition, the RSBOJC notes the Sulphur Creek is now defined as "upstream from the mouth of 46.3815, longitude -119.9584" on page 127, Table 602 for WRIA 37 and is proposed as Primary Contact for Recreational Uses. This site is just north of the Roza Irrigation District boundary. The Sulphur Creek Wasteway is a defined man-made irrigation

facility within the boundaries of both the Roza and the Sunnyside Valley Irrigation Districts. The RSBOJC proposes the Sulphur Creek Wasteway, which is agricultural return flow water, define *E. coli* compliance by the FDA FSMA standards.

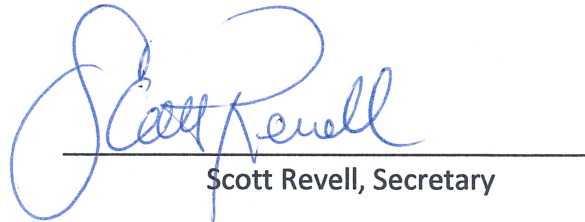
Sincerely,



Elaine S. Brouillard, RSBOJC Water Quality Supervisor



Lori Brady, Treasurer



Scott Revell, Secretary