

## Woodland Resource Services Inc. (Eric Meador)

I think having the list of approved adjuvants live on the website instead of the appendix of the permit is a great idea for the reason stated in your comments!

Great to have Triclopyr Choline added to the list of approved ingredients. The "Irrigation Permit" is where we're having the most trouble with such a short list of approved products. We're now facing Glyphosate resistant Kochia here on the east side because in "orchard/vineyard" areas glyphosate is the only post-emergent product allowed on the inner banks of canals. (2,4d is too volatile for those areas)

On page 24, S5.E2.B there is a clause regarding posting signs that face both the water and the shore. From our 15 years of experience, the sign facing the water seems to be redundant and only contribute to more litter and wasted materials. If they were in the water when we posted the sign; they would see us doing it and realize a treatment was about to take place. If they entered the water after the sign was posted, they would see the sign facing the shore as they approached the water body anyway. I just can't think of a likely scenario where the sign facing the water would ever be used.

S6.A.1: This provision seems very challenging to the actual work-flow that typically occurs. Typically, treatments are scheduled weeks in advance (business/residential notice as well as Ecology pre-treatment notification requirements the week before) and the contracted applicator arrives the morning of the treatment. This provision appears to require the temperature to be taken, at a minimum, and possibly other parameters. Either the applicator would do it when they arrive (and possibly have to turn around and drive hours home) or the sponsor would need to do it the day before to make sure conditions were permissible for treatment. Can the permittee delegate the task to the sponsor who likely lives close to the site? Is there a relatively inexpensive device that can measure these parameters that sponsors could buy? I could see a potential for a real challenge if it's a shallow waterbody that is subject to the July 15th WDFW timing window restrictions forcing us to wait for the hottest time of year in order to be able to treat. The provision also doesn't state how long prior to treatment the measurements can be taken...1 day, 1 week, 1 month?? If the applicator is required to visit the site the day before (i.e. a special trip) to take the sample, it could add enough cost to smaller jobs that the treatment would no longer be financially viable. Maybe there have been issues with fish kills related to this, but I'm not aware of any.