



STATE OF WASHINGTON

## NOXIOUS WEED CONTROL BOARD

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November 18, 2011

Washington State Department of Ecology  
c/o Kathy Hamel  
P.O. Box 47600  
Olympia, WA 98504-7600

Dear Ms. Hamel,

Thank you for the opportunity to submit comments regarding the draft Aquatic Noxious Weed Management General Permit for 2012. The WSNWCB sincerely appreciates and supports the effort that went into modifying the 2008 permit to make it easier to understand, and with which to comply. Separating the Aquatic Noxious Weed Management General Permit and the Aquatic Plant and Algae Management General Permit by the process by which chemicals are discharged into streams, rivers, estuaries, marine areas, wetlands, lake shorelines, roadside ditches, and other wet areas— *i.e.*, either directly or indirectly – will be beneficial to those applicators who are strictly treating noxious weeds, WSDA quarantine species, and other invasive plants along these wet areas, and not discharging directly into water bodies. This distinction makes the permit notification and posting process easier for those who are engaged in the indirect chemical applications of emergent and riparian noxious weeds. Moreover, these changes may reduce the inadvertent non-compliance of notification and posting. The WSNWCB appreciates the inclusion of five new active ingredients to the permit.

The WSNWCB also requests clarification as to whether or not the draft permit for 2012 will cover the treatment of Japanese eelgrass, *Zostera japonica*, which will be a Class C noxious weed (on commercially managed shellfish beds) effective in January 2012?

Sincerely,

Alison Halpern  
Executive Secretary  
Washington State Noxious Weed Control Board