

From: [Hardiman, Michael O CIV NAVFAC NW, PRB41](#)
To: [Hamel, Kathy \(ECY\)](#)
Subject: Draft Aquatic Noxious Weed Control NPDES General Permit
Date: Monday, October 24, 2011 1:51:52 PM

Hi Kathy - one comment below.

S1. Permit Coverage. It is not clear whether stem injection of near shore invasive/noxious plants (e.g. Japanese knotweed) will require permit coverage. I would not consider this type of application to have the potential to indirectly enter surface water as defined by this permit. Since this is a fairly common method of knotweed control recommend clarifying this in S1 and/or in the Appendix A definition of "Indirectly" and/or in the Fact Sheet.

Thanks, Mike

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