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To: [Lubliner, Nathan \(ECY\)](#)
Subject: NPDES japonica
Date: Friday, January 31, 2014 8:45:16 AM

Good Morning !!

I can't remember the name of the WDFW person you have been working with. I have slept since we talked.... Randy ????

Also from Pages 53/54 of fact sheet:

“Permittees must apply herbicide only when the action threshold, as identified in their DMP, is met. Applicators must only treat plants when there is at least an hour of dry time before tidal inundation. This allows adequate time for plants to take up the herbicide before the incoming tide washes herbicide residues off the plants. Ecology limited the application period to daylight hours during April 15 through June 30 and only one application per season per treated area. The application window occurs after the herring-spawning season in Willapa Bay, but is an optimal time for germination and rapid growth of *Z. japonica*. **The application window is also within the work windows set by WDFW for their regulatory Hydraulic Project Approval Program to protect fish life.** To avoid potential overlap with pesticide applications to control burrowing shrimp, this permit will not allow discharge of other pesticides to commercial clam beds on the four days before and after imazamox application. Limiting the treatment to one application per season, helps reduce the amount of herbicide applied per area and may reduce the potential for *Z. japonica* to become resistant to imazamox.”

The bold statement is only a fact for Herring Spawning restrictions (Feb 1 - March 15). The NO WORK window to protect out-migrating salmon is March 1-June 14 for Willapa bay. I would say that the activities proposed will most likely have no effect on out-migrating salmon but there is a closure for work in the harbor to protect them. So I would recommend changing the end of the sentence to “protect herring spawning periods”.

Also on page 54.

“Since *Z. japonica* beds typically lie at higher tidal elevations than do *Z. marina* plants, incoming tides will tend to submerge *Z. marina* before inundating treated *Z. japonica* beds. This will help dilute and lower imazamox water concentrations around nearby downslope *Z. marina* beds and imposing a **20m buffer** around the property line should protect these plants from imazamox damage.”

I see it says 20m buffer. Everywhere else there is reference to 10m buffer. Don't know if this is referring to a different buffer or it's a typo.

Hope this helps. I should be in my office all day, number below, if you need to contact me or want to talk about any of this let me know.

And FYI its sounding like I am being directed to stay clear of the meeting tomorrow. ☺

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