

From: [Tuttle, George \(AGR\)](#)
To: [Jennings, Jonathan \(ECY\)](#)
Cc: [Bahr, Gary \(AGR\)](#)
Subject: WSDA Comments
Date: Wednesday, November 6, 2019 2:51:21 PM

Good afternoon John,

I reviewed the draft permit and fact sheet for the *Zostera japonica* management on commercial clam beds in Willapa Bay General Permit. While I did not see anything that I thought was worthy of submitting an official comment about I did see a few things that I thought would be worth sending you some unofficial comments about.

Comments for the draft permit as follows:

- Under Special section 5 on Page 11 and 12 the permit describes samples that are required to be collected. Could you perhaps make two lists; separate out “The following parameters need not be (analyzed by an) accredited or registered (laboratory)” and move that list below the list of parameters that do need to be analyzed by an by an accredited lab? I think that it might improve this section and make it more readable.
- On page 12 under Documentation of monitoring activities and results must include (if applicable), it states that the “exact place” of sampling should be documented under a. Could you add, with GPS coordinates or latitude and longitude? I think that would provide a better record.

Comments for the draft fact sheet as follows:

- Under AQUATIC PESTICIDE LEGAL HISTORY on page 9 it states that , “States have primary authority under FIFRA to enforce”. Could you change the word “primary” to the word “delegated”? That is the commonly used term to describe the authority from EPA to implement FIFRA.
- Under AQUATIC PESTICIDE LEGAL HISTORY on page 10 the web link: http://www.epa.gov/oppsrrd1/registration_review/ is to a page that no longer exists. Here is a replacement web link to the new page: <https://www.epa.gov/pesticide-reevaluation/registration-review-process>
- Under AQUATIC PESTICIDE LEGAL HISTORY on page 10 the web link: www.agr.wa.gov/PestFert/LicensingEd/Licensing.htm is to a page that no longer exists. Here is a replacement web link to the new page: <https://agr.wa.gov/services/licenses-permits-and-certificates/pesticide-license-and-recertification/pesticide-and-spi-licensing>

I hope that these comments are useful to you and I hope you are doing well.

Appreciatively,
George Tuttle

Toxicologist | Washington State Department of Agriculture
George.Tuttle@agr.wa.gov | Mobile (360) 790-8987 | Office (360) 902-2066
1111 Washington Street SE Olympia WA, 98502 | Mail Stop 42560

