Skye Cyr

Hello,

Thank you for providing the opportunity to publicly comment on the Zostera japonica Management General Permit for the Willapa Bay area.

My name is Apo Skye Cyr and I am a Natural Resources student in the bachelor's program at Green River College. I have a degree in Water Quality, but the focus was largely on freshwater streams and rivers, so I am interested in the process for more oceanic endeavors.

From what I recall, public comments from the pre-approved 2019 draft of the plan listed difficulties in testing the effects of Imazamox on marine bacteria. I was wondering if there have been any updates on this front in the past few years. Additionally, in the 2019-2024 period where there any instances of this permit being issued for experimental use? I think that overall, the use of Imazamox aquatic herbicides is not a bad thing (due to its listing as a largely non-impactful herbicide for humans, I believe under National Toxics Rule 40 CFR 131.36) but would like to know if there are any additional permits needed for other chemicals—for example, if the primary ingredient is Imazamox but there is a secondary herbicide that is detrimental to the environment would this product require two permits to be used? Or would the use be covered, as Imazamox is the primary ingredient? Under WAC 173-201A-410 water quality standards are allowed to be exceeded, but I was wondering if there is a hard limit on days that this can occur, or if the temporary limit is assessed on a case-by-case basis.

I apologize if these questions have already been answered somewhere. This is my first time publicly commenting on a project and there may be a learning curve involved in the process.

Thank you for the opportunity to engage in public discourse and to review your draft.

Sincerely, Apo Skye Cyr