

From: [Ken Wiegardt](#)
To: [Lubliner, Nathan \(ECY\)](#)
Subject: Comment letter on Japonica Draft Permit
Date: Friday, February 14, 2014 2:24:55 PM

Nathan Lubliner, Permit Writer
Washington State Department of Ecology
PO Box 47600
Olympia, Washington 98504
Delivered via: Nathan.Lubliner@ecy.wa.gov

Dear Mr. Lubliner,

I'm writing to provide comment on the proposed NPDES permit to allow the use of Imazamox to control the invasive weed *Zostera japonica*. I'm a fifth generation shellfish farmer who has worked on the tidelands of Willapa Bay my entire life. I have personally witnessed this weed explode at an exponential rate over the past decade. What was once productive diverse habitat is now a tangled impenetrable mess of nothing but *Z japonica*. I urge the Department of Ecology to expedite the issuance of this permit.

My concern with the permit as written is concerning proposed buffers. A 10 meter buffer is vastly over constrictive. Leaving this much untreated ground on a productive clam bed will have many negative consequences. It will cause reinfestation to occur at a much faster rate. It will have a huge economic cost in lost production to the shellfish farmer. And it could set a bad precedent. As far as I am aware no other listed noxious weed (which *Z japonica* is) has buffer zones of any type in their control plans. As for protecting *Z marina*, this big of a buffer is not needed. Previous work in the field has shown that Imazamox has little to no off site impact when applied correctly.

Once this permit is issued I'm confident that the benefits to controlling *Z japonica* will become obvious to any nay sayers.

Thank you,

Ken Wiegardt