

From: [Halpern, Alison \(AGR\)](#)
To: [Lubliner, Nathan \(ECY\)](#)
Cc: [Tony Stadelman \(ajstadelman@gmail.com\)](mailto:ajstadelman@gmail.com)
Subject: comments regarding Draft Zostera japonica General Permit
Date: Saturday, February 15, 2014 1:27:20 PM
Attachments: [WSNWCB comments.pdf](#)

Dear Nathan,

Thank you for the opportunity to provide comments regarding the proposed issuance of the Japanese eelgrass Management on Commercial Clam Beds in Willapa Bay NPDES General Permit. Please see the attached comments from the Washington State Noxious Weed Control Board.

Sincerely,

Alison

Alison Halpern
Executive Secretary
WA State Noxious Weed Control Board
(360) 902-2053
www.nwcb.wa.gov



STATE OF WASHINGTON

NOXIOUS WEED CONTROL BOARD

1111 Washington Street SE • P.O. Box 42560 • Olympia, WA 98504-2560 • (360) 902-2053

February 15, 2014

Nathan Lubliner
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

Dear Mr. Lubliner:

The Washington State Noxious Weed Control Board (WSNWCB) supports the Washington Department of Ecology's (Ecology) currently proposed five-year NPDES general permit for the application of the aquatic herbicide imazamox for the management of the Class C noxious weed Japanese eelgrass, *Zostera japonica*, on commercial clam beds in Willapa Bay. The limited scope of the proposed general permit, coupled with systematic monitoring of the 10-m buffer zone (when treatment occurs up to that buffer) will help Ecology to collect data and evaluate the efficacy of imazamox to control Japanese eelgrass while determining whether its application to commercial clam beds has direct impacts to the native eelgrass, *Zostera marina*, in surrounding areas.

Japanese eelgrass is a nonnative, invasive marine and estuarine species that is capable of colonizing the upper tidal zone, converting valuable, native, bare mudflat and sandflat habitat into heavily vegetated areas, particularly in parts of Willapa Bay. It is negatively impacting the shellfish industry, particularly commercial clam production in Willapa Bay. It is important that shellfish growers have as many tools as possible to manage this Class C noxious weed, and this practically non-toxic (by EPA standards) herbicide should be included as option in integrated pest management (IPM) practices.

Sincerely,

A handwritten signature in blue ink that reads "Alison Halpern".

Alison Halpern
Executive Secretary, Washington State Noxious Weed Control Board

Cc: Tony Stadelman, Chair, Washington State Noxious Weed Control Board

