

From: hwbranch@aol.com
To: [Hamel, Kathy \(ECY\)](#)
Subject: eelgrass comments
Date: Wednesday, February 08, 2012 8:01:34 AM

Dear Department of Ecology,

Re: Japanese eelgrass control

Controlling Japanese eelgrass with imazamox herbicide is a mistake.

1. Although Japanese eelgrass is classified as an invasive, this alone is not reason to consider it a detriment to northwest marine ecosystems. Ecosystems are in constant flux. Species come and species go and they have as long as life has existed on earth.
2. Japanese eelgrass is considered ecologically beneficial in other countries and is prized and protected. It provides spawning habitat and other ecosystem benefits.
3. Japanese eelgrass tends to grow in the upper intertidal zone where native eelgrass doesn't grow. In the mid zone it is displaced over time by native eelgrass that tends to grow more vigorously but takes more time to become established. Repeated poisoning of native eelgrass has probably helped create a niche for Japanese eelgrass.
4. The proposal is to poison Japanese eelgrass with imazamox. Imazamox is touted as a safer alternative to glyphosate and other, older herbicides. The history of herbicide use has been one of continual invention. The reasons are two-fold. Firstly, plants develop resistance to herbicides over time. Secondly we learn over time of the health risks associated with chemical herbicides and insecticides, including damage to DNA, endocrine disruption (diabetes), cancers, birth defects and others. Eventually, every chemical either becomes ineffective or banned. Sometimes we end up with DDT legacies, dioxin and other persistent contaminants. There is never any accountability. We still suffer the effects of Agent Orange and will continue to do so for the foreseeable future. What do we expect from a system where industries do their own risk assessment? Under the current system, newer means anything but safer.
5. Shellfish aquaculture displaces native species such as burrowing shrimp. It impedes outmigration of forage fish and salmon. It reduces productivity ecosystem-wide, exacerbating economic hardship in communities up and down the coast.
6. When we physically mangle the all important nearshore and poison whatever plants and animals live there with chemical herbicides and insecticides, we reduce the productivity of the system, we reduce the richness of the system (the variety of species) and we lock ourselves into a pathway of ongoing reliance on chemicals.

Harry Branch