

**From:** [R. Brewer](#)  
**To:** [Hamel, Kathy \(ECY\)](#)  
**Subject:** Japanese Eelgrass NPDES Planning  
**Date:** Friday, March 09, 2012 4:26:42 PM

---

Kathy,

The Washington Waterfowl Association has recently become aware of the Japanese eelgrass herbicide NPDES process for Willapa Bay. We understand the Pacific County Marine Resources Council just last night, made recommendation to the state to allow herbicide spraying across much or all of the bay to control Jap. Eelgrass.

In a review of the science eloquently provided in comments to you by a Ph.D. student who studied the eelgrass, it seems the benefits and detriments of Jap. Eelgrass have yet to be adequately understood. As do the potential non-target effects of the new herbicide. However, we also fully understand and appreciate the need of commercial shellfish growers to protect their investments.

In regard to the lack of knowledge about Jap. Eelgrass in Willapa Bay, we are interested in determining the role that the eelgrass plays in waterfowl ecology for Willapa Bay, and have begun preliminary planning to provide some funding to research this unknown, possibly in combination with some waterfowl carrying capacity work for the region, as well as possible coordination of the study of transport and non-target toxicity of the herbicide when applied to clam beds. These research initiation efforts are in their infancy and require some additional time to develop and conduct, but after speaking with Mr. Don Kraege, waterfowl section manager of the Washington Department of Fish and Wildlife, it seems the research could be conducted with mutual participation of the Willapa National Wildlife Refuge, Washington Department of Fish and Wildlife, and the Washington Waterfowl Association.

Given the state of the science AND the need for some control, the Washington Waterfowl Association would like to suggest that Ecology provide for limited eelgrass control on commercial clam beds, but refraining from allowing widespread spraying until further information can be gathered regarding the competition between the native and non-native eelgrasses, as well as how native fish and wildlife rely on Jap. Eelgrass and how they may be impacted by the herbicide and eelgrass eradication. This research is also important because of its implication for Puget Sound Jap. Eelgrass management.

Thank you for your consideration.

Rone Brewer  
Vice President

*Washington Waterfowl Association - NW*  
*Habitat, Hunting, Legislation, Legal, Research - Heritage*  
*NWDucks@frontier.com*

206.595.7481