

William E Burrows  
PO Box 766  
Allyn, WA 98524  
(360) 432-8222

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Kathy Hamel  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

Ms. Hamel,

I am writing regarding the “Japanese Eelgrass Management on Commercial Shellfish Beds General Permit” proposal regarding the use of imazamox to manage Japanese eelgrass on commercial shellfish beds.

I am opposed to the used of this herbicide, and in general any chemical application within the marine water in Washington State.

As documented by marine biologist Dan Pentella, Japanese eelgrass serves a valuable function within the marine ecosystem. The fact that it is non-native species is irrelevant in terms of its ecological value. This value has been recognized within Washington State for years due to the classification of Japanese eelgrass as a “priority habitat species” by the Washington State Noxious Weed Control Board. Changing the classification from a “priority habitat species” to a “noxious weed” was not done based on science, rather it was due to the lobbying efforts of the shellfish industry.

The health of Puget Sounds is a high-priority item, and allowing private industrial interests to degrade the marine ecosystem to enhance their bottom line is not appropriate.

Note that the Washington Department of Fish and Wildlife reviewed this proposal and they stated:

“WDFW strongly opposes the listing of *Z. japonica* [an eelgrass] as a noxious weed in Puget Sound. Chinook and chum salmon, steelhead trout, and three species of rockfish are listed under the Endangered Species Act in Puget Sound. All but steelhead juvenile life history stages of these species are widely known to use eelgrass as cover from predation, as migration corridors, and to seek food resources.”

In addition, the need for a herbicide to clear any Japanese eelgrass from a shellfish operation is not needed. State law already allows the shellfish interest to remove the eelgrass if they want to. In a comment posted in *The Olympian*, Alison Halpern, Executive Secretary, WSNWCB made the following comment:



#### WA State Noxious Weed Board

To clarify, the WA State Noxious Weed Control Board listed Japanese eelgrass as a Class C noxious weed on commercially managed shellfish beds only. Japanese eelgrass is a different species from our ecologically valuable native eelgrass, *Zostera marina*.

The board's actions will not threaten salmon recovery efforts. Regardless of the noxious weed listing, any landowner can control Japanese eelgrass on his or her property without violating WDFW's Priority Species and Habitat List. However, landowners are currently limited to mechanical/manual means of control only.

You can learn more about the 2012 noxious weed listing process (including Japanese eelgrass) at <http://www.nwcb.wa.gov/siteFiles/2012%20listing%20process%20summary.pdf> or about noxious weeds in general at <http://www.nwcb.wa.gov/default.aspx>.

Alison Halpern

Executive Secretary, WSNWCB

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(Source: <http://www.theolympian.com/2012/01/25/1962944/eelgrass-species-should-be-protected.html#storylink=misearch>)

In summary, the use of the herbicide imazamox to manage Japanese eelgrass on commercial shellfish beds will have a negative impact on the health of the marine ecosystem according to highly-qualified marine biologists. In addition, the use of a herbicide is not required because mechanical/manual means already exist.

Thank you for considering these comments.

Sincerely,

William E Burrows