

From: [Hamel, Kathy \(ECY\)](#)
To: [Hamel, Kathy \(ECY\)](#)
Subject: Curt Puddicombe Comment
Date: Tuesday, March 13, 2012 1:51:47 PM

To: Hamel, Kathy (ECY)
Subject: Japanese Eelgrass Management on Commercial Shellfish Beds General Permit

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

Dear Ms. Hamel,

We oppose the use of herbicides to control eelgrass in Washington State. The DOE should not permit this activity.

The herbicide imazamox will kill *zostera japonica*, but it will also kill native *zostera marina*. In numerous cases both species grow adjacent to each other, so the treatment of *japonica* will also likely kill *marina*. We simply can't allow the destruction of any more eelgrass.

Japonica has some of the same functions as native eelgrass. It provides for sediment stabilization, provides for nursery and spawning habitat for fish, and removes nitrogen. Herring spawn readily on *zostera japonica*. *Japonica* and its values to brant, wigeon, mallards, pintails and teal is seen in the waterfowl link below:

<http://www.int-res.com/articles/meps/103/m103p119.pdf>

Shorebirds in Puget Sound are down by 70 percent just in the last 20 years. Wild Chinook are on the brink of extinction. The use of herbicides is not consistent with the Shoreline Management Act or with federal laws, nor is it consistent with our collective values as responsible stewards of the environment.

Thank you for your time.

Regards,

Curt Puddicombe
Vice President
Case Inlet Shoreline Association
PO Box 228
Vaughn, WA 98394