

From: ericamc@comcast.net
To: [Hamel, Kathy \(ECY\)](#)
Subject: Use of Imazamox on Commercial Shellfish Beds
Date: Friday, March 09, 2012 7:52:27 AM

Kathy Hamel, Director
Washington State Dept. of Ecology
PO Box 47600
Olympia, WA 98504-7600

Subj: Comment Deadline of March 9, 2012
Ecology Decision on Use of Imazamox to Eradicate Zostera Japonica on
Commercial Shellfish Beds

Dear Ms. Hamel:

I'm writing to protest issuing a *general permit* to allow the spraying ,or other mode of applying, the herbicide Imazamox on commercial shellfish beds.

A general permit would allow the shellfish industry to apply Imazamox on *any* shellfish bed, owned or leased, or proposed to become a commercial shellfish bed as long as it is "similar" in purpose. From the literature, discussions among professionals, and meetings, the industry has focused government and public attention on the intrusion of Japanese eelgrass (zostera japonica) in Willipa Bay, yet a *general permit* would allow Imazamox to be used on every type of inlet, without regard for adjacent properties, the health of upland residents or the wildlife that benefit from both japonica and native eelgrass (zostera marina).

For example: At the February 24th meeting in Olympia I noted that two applications have been filed with Pierce County to establish industrial size geoduck farms, one on the northeast shore of Henderson Bay near Wauna, the other just inside the Purdy Spit on Burley Lagoon. I've seen a map of eelgrass beds at those sites. Should the applications be approved in any format, industry could use a general permit to spray Imazamox at will to eradicate zostera japonica. Since japonica thrives higher in the tidal zone, spraying would no doubt filter to zostera marina beds as well. We don't believe there is any way to keep Imazamox from spreading through normal tide movement, especially into Burley Lagoon.

A waterborne herbicide would flow directly to where over 22 children, under the age of 16, swim, play in the mudflats, kayak, and just generally paddle around....all summer long. That is my waterfront neighborhood. This is a highly residential area, but nothing in the permit process recognizes our rights, only the bottom line for the shellfish industry. It is clear to waterfront property owners that the industry simply wants to remove anything that hampers the installation of industrial size geoduck farms. We don't want our neighborhood children to become the "canaries in the mine shaft" and only discover later that Imazamox is as toxic on water as it was toxic on contact when applied to corn in Ohio!

At the Geoduck Symposium, Micah Horwith described in detail the experimental plots on Fisk Bar. It seemed to indicate that a geoduck farm would only temporarily replace or interrupt the growth of *zostera marina*. But I believe the spillover spraying of Imazamox will kill everything, and the continuous harvest/ replant cycle on an industrial size farm will not provide enough time or conditions for the survival of either *zostera japonica* or *zostera marina*.

When considering the release of an herbicide like Imazamox, we cannot pretend that it doesn't impact the survival of herring, sand lance and salmon. No controls, no salmon. That is our bottom line.

Sincerely,

Heather McFarlane
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