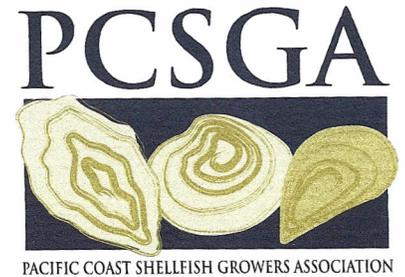


March 9, 2012

Kathy Hamel  
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sustainably farmed  
oysters, clams, mussels, scallops

Dear Ms. Hamel,

Thank you for providing an opportunity to comment on the development of a general permit application of the aquatic herbicide imazamox to manage Japanese eelgrass (*Zostera Japonica*) on commercial shellfish beds. I am submitting these comments on behalf of the Pacific Coast Shellfish Growers Association (PCSGA). I understand that the comments you receive will assist in determining if it is appropriate for Ecology to develop a permit for this activity. Comments received during this process may help you define specific limitations and conditions that may apply, as a permit is developed.

The Pacific Coast Shellfish Growers Association, founded in 1930, represents shellfish growers from Alaska, Washington, Oregon, Hawaii and California who sustainably produce oysters, clams, mussels, scallops and geoduck. These dedicated individuals pride themselves not only on the quality of their shellfish but also in their role as environmental stewards, mindful of the dynamic conditions in the marine environment. PCSGA represents both private and tribal shellfishing interests and most members farm because their parents, grandparents and even great-grandparents did – demonstrating a longstanding commitment to natural resources.

Similar to terrestrial farmers, shellfish growers deal with a multitude of variables to produce viable crops including weather, health of seed and management of competing and often invasive species. For years, the presence of *Zostera Japonica* has been increasing among commercial shellfish beds. It is yet unknown the true impact this species will have on Washington's shellfish industry. However the level of effort required by some growers in order to manage *Japonica* on their property is significant. In general, impacts of *Japonica* on commercial shellfish beds range from devastating, to not yet a significant problem depending on the location of the farm. While farms in many areas of Willapa Bay seem to be the most severely affected, PCSGA is highly concerned about the increasing number of affected growing areas throughout Washington as the *Japonica* infestation continues to expand.

PCSGA urges you to write a permit that allows for the use of imazamox for the control of *Japonica* for commercially managed shellfish beds, statewide. Allowance

under NPDES for the use of the herbicide will not mean it will be used in all areas, all of the time. Rather it would be used along-side mechanical methods and other approaches consistent with Integrated Pest Management (IPM) approach. Imazamox, which is currently used for fresh water applications, is known to be less toxic than imazaphyr, which is currently authorized for the eradication Spartina.

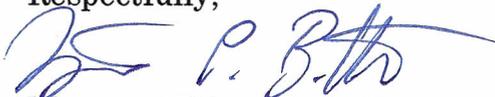
Members of PCSGA find this current situation with Japonica all too similar to the early days of Spartina management. Debates over the habitat value and general unwillingness to consider Spartina as an invasive species ultimately led to the widespread presence in Willapa Bay. Millions of state and federal dollars were spent to irradiate Spartina. Efforts were successful due in part to the fact that multiple methods were allowed to be used. Washington's shellfish growers do not want to be in that situation again. A general application permit for the use of imazamox is one step in avoiding a possible repeat of wide-spread, expensive control efforts, similar to those for Spartina.

The presence of Japonica in commercially managed shellfish beds has a negative impact on shellfish. Data shows that it reduces seed recruitment by up to 60%, reduces meat yield, reduces shell growth, and harbors greater populations of predators. Areas with Japonica are unable to support the three-dimensional habitat necessary to support the natural recruitment of shellfish. Japonica degrades sandy inter-tidal areas by trapping sediment and, over time, creating mucky anaerobic conditions. Native species, including native eelgrass marina, are unable to live in such conditions, so they become displaced by Japonica. In support of state efforts to conserve native eelgrass, we should not be protecting the invasive Japonica.

In 2011 the State Weed Board recognized the economic impact of Japonica to the shellfish industry and listed it as a Class-C noxious weed. PCSGA asks that Ecology support that listing and provide a mechanism to control Japonica on commercially managed shellfish beds.

Thank you for the opportunity to offer input. Please keep me informed as this process continues and contact me if you need more information.

Respectfully,

A handwritten signature in blue ink, appearing to read 'M. P. Barrette', with a long, sweeping horizontal line extending to the right.

Margaret Pilaro Barrette  
Executive Director