

From: [Donald Peterson](#)
To: [Hamel, Kathy \(ECY\)](#)
Subject: Japanese eelgrass permit
Date: Monday, March 05, 2012 9:40:44 PM

March 5, 2012

Washington State Department of Ecology

P.O. Box 47600

Olympia, WA 98504-7600

Re: Japanese Eelgrass Management on Commercial Shellfish Beds General Permit

Attn: Ms. Kathy Hamel

The Department of Ecology (DOE) is proposing to issue a general permit for the application of the aquatic herbicide, imazamox, to help manage Japanese eelgrass, *Zostera japonica*, on commercial shellfish beds. This letter is written in opposition to the DOE proposal.

In viewing various written documents on Japanese eelgrass, it appears the primary reason for spraying imazamox is to eliminate Japanese eelgrass, which would reduce costs and increase profits for commercial shellfish growers. The profit motive has always been a powerful excuse to act in the short term, without adequate evidence of long-term consequences. The long term effects of such spraying to Washington's waters, shorelines, wildlife, and citizens should be the first consideration, not the profits and proliferation of a particular industry.

Without strict regulations for use, independent, ongoing, and well-financed monitoring for compliance, and non-compliance penalties in place, the use of imazamox in our waters should not be considered. In addition, written, timely notification to adjacent shoreline property owners and posted public notices would need to be mandatory. Many, from property owners to tourists, would not want their families exposed to the herbicide. It is the responsibility of our government agencies to act for the common good and not to neglect developing stringent standards to protect the interests of the people for the long term. Issuing this general permit without enforceable standards in place gives unwarranted freedom to manipulate our aquatic lands to a small interest group.

It is publicized that Japanese eelgrass appears to have a structure and function similar to the important and protected native eelgrass, *Zostera marina*, and seems to be a major food source for migrating shorebirds. Indeed, studies have shown that Japanese eelgrass may comprise the largest percentage of diet for many duck species and, although it was inadvertently introduced, is generally beneficial to major components of our ecosystem. Why should we spray to eliminate said eelgrass especially when such spraying may also kill the important and protected native eelgrass species?

Once again, it appears that relatively short-term economic impacts are taking precedence over long-term ecological benefits. Such has happened many times before with devastating results. Let's not let this happen yet again.

Thank you for the opportunity to comment on the referenced DOE proposal.

Very truly yours,

Don Peterson

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