

**From:** [Norm Baker](#)  
**To:** [ECY RE Japanese Eelgrass Permit Comments](#)  
**Subject:** Japanese Eelgrass Management on Commercial Clam Beds  
**Date:** Sunday, October 21, 2012 10:10:08 AM

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Dear Ms Hamel;

I am opposed to the Department of Ecology issuing a general permit for the application of the aquatic herbicide imazamox to manage Japanese eelgrass on commercial clam beds in Willapa Bay.

There are several problems with granting this permit.

First, as I understand it from the specialists who have looked at this issue, Japanese eelgrass has not been shown to be a significant problem for Puget Sound ecosystems. It occupies a somewhat different niche than our native eelgrass. Fortunately that niche is different enough that it seems to actually be a significant positive addition to restoration of eelgrass beds and Puget Sound ecosystems. As you are probably aware, the destruction of our nearshore habitat, especially eelgrass beds is an ongoing problem with continued development of Puget Sound. Eelgrass beds are, for lack of a better term, fish nurseries for most of the harvestable fish (salmon, rockfish, and forage fish) species in Puget Sound waters. Perhaps you are not aware that the state of Washington has the most endangered marine species of any state or province in North America. The state of Washington also has the very least amount of protected habitat for ecosystem and fisheries recovery of any state or province on the West Coast of North America. This is not a distinction I am proud of.

Second, as I understand it, Japanese eelgrass tends to occupy slightly deeper sites than our native species. It also does not seem to compete directly with our native species. I question whether or not Japanese eelgrass needs to be controlled. I also question whether or not our native species needs to be controlled on commercial aquaculture clam beds. The application of any pesticide to our Puget Sound waters needs to be very carefully considered. Personally, I would prefer all aquaculture of any species to be conducted on land where the environment could be carefully controlled. I would also prefer that our aquaculture industry stop applying pesticides and stop degrading Puget Sound ecosystems with self serving short sighted technologies that are not needed and are certainly not appropriate for the ongoing restoration efforts in Puget Sound.

Third, declaring Japanese eelgrass an invasive species is simply a ruse to control all eelgrass in all clam beds. Eelgrass does not need to be controlled. Eelgrass needs to be propagated and all historical beds restored so that we may restore our fisheries and Puget Sound ecosystems.

Fourth, I am trained professionally as an entomologist and ecologist. Invasive species in a terrestrial environment can have pesticides applied in a way that targets that species. Applying pesticides in an aquatic environment does not target the offending species. It targets every living species in the area because the aquatic environment

prevents targeted application.

Please do not let the Department of Ecology issue a general permit or the application of the aquatic herbicide imazamox to manage Japanese eelgrass on commercial clam beds in Willapa Bay.

This is simply wrong. We should not permit the aquaculture industry to continue to let the public and the environment shoulder the cost of their profit motives.

Sincerely yours,

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*Life is being curious, knowing, experiencing, and acting.*

(Dr Sai Bhaskar Reddy - sensu latu)