
From: John Boettner [johnboettner@me.com]
Sent: Sunday, October 28, 2012 11:57 AM
To: Hamel, Kathy (ECY)
Subject: Eelgrass Management?

From: John Boettner <johnb<<mailto:johnboettner@me.com>>>
Date: Sun, October 28, 2012 11:21 am
To: Kathy Hamel, Dept. of Ecology

Dear Ms. Hamel,

As a retired landscape ecologist for the State of Washington, and a manager of a 95 acre tideland parcel in Snohomish county for aquaculture, I fail to see an ounce of justification for controlling any species of eelgrass when eelgrass provides so many important ecological functions for species of salmon and forage fish. Perhaps I misunderstood your proposal, but as I understand it you wish to control the eelgrass for the purpose of providing assistance for aquaculture, what kind of assistance? With all the problems we have with the discharge of pollutants to control Spartina, now a proposal to control eelgrass? What next?

Under this proposal, the Dept. of Ecology (DOE) considers Japanese eelgrass a noxious weed. I do not dispute that Japanese eelgrass is considered an invasive species, but as invasive species are concerned, Japanese eelgrass provides many more beneficial and natural functions, and to be honest I fail to see a rational for such drastic measures.

How does DOE propose to protect other native species of flora and fauna (especially species listed under the Endangered Species Act) with this proposal?

One essential function Japanese eelgrass provides is erosion control, as a tideland manager trying to contend with chronic siltation from a variety of sources, I fail to see how this proposal does anything to control erosion; much to the contrary, I think believe this proposal will negatively impact problems with erosion, both short and long-term.

If DOE manages resources for the benefit of the citizens of Washington State, employing long-term sustainable management practices, I urge you to reject this proposal. As a land manager interested in promoting aquaculture, I see NO benefit from this proposal. Any venture that impacts eelgrass affects the foundation of marine ecological function and nearshore processes.

John Boettner
Manager Boettner/Triesch Tideland
Ecosystems First LLC
[www.ecosystemsfirst.com<http://www.ecosystemsfirst.com/Triesch>](http://www.ecosystemsfirst.com/Triesch)
[johnb@ecosystemsfirst.com<mailto:johnb@ecosystemsfirst.com>](mailto:johnb@ecosystemsfirst.com)

Sent from my iPad

-----Original Message-----

From: John Boettner [mailto:johnboettner@me.com]
Sent: Sunday, October 28, 2012 10:34 PM
To: Hamel, Kathy (ECY)
Subject: Re: Eelgrass Management?

Dear Ms. Hamel,

As a commercial shellfish property manager, it is not very comforting to know that a proposal has been made to apply imazamox to our property without considering Precautionary Principles, the consequences of potentially adverse impacts, much less give me some say in the matter.

As a former oil spill response specialist for Dept. of Natural Resources, my concern about the effects of dispersants for treating oil spills have only increased since the oil spill in the Gulf of Mexico, especially since I am now a stakeholder in commercial shellfish. The way I was introduced to the topic of oil spill dispersants in Washington State, almost gave the impression that they could be taken for breakfast every morning, should I feel that way about imazamox?

Have precautions been taken to see to the preservation of forage fish spawning habitat? You know as well as I do that this proposal will do nothing to achieve your goal, and if you do go through with it you will only be making things worse than they are already.

When did this kind of stewardship become policy?

Thank you for accepting my comments,

John Boettner
Manager Boettner/Triesch Tideland