



STATE OF WASHINGTON

## NOXIOUS WEED CONTROL BOARD

1111 Washington Street SE • P.O. Box 42560 • Olympia, WA 98504-2560 • (360) 902-2053

November 2, 2012

Dear Ms. Hamel,

The Washington State Noxious Weed Control Board (WSNWCB) supports the Washington Department of Ecology's (Ecology) issuance of a general permit for the application of the aquatic herbicide imazamox (Clearcast) to control Japanese eelgrass, *Zostera japonica*, on commercially managed clam beds in Willapa Bay. As you know, the WSNWCB listed this species in 2012 as a Class C noxious weed on commercially managed shellfish beds only, due to the very real impacts of this nonnative species on the production of clams, particularly in Willapa Bay.

The limited scope of the general permit, *i.e.*, commercially managed clam beds of Willapa Bay, will allow Ecology to gather data regarding the efficacy Clearcast to control Japanese eelgrass and the adequacy of buffers to protect the native eelgrass, *Zostera marina*, when the herbicide is applied during low tide. It will also provide preliminary data to assess the impact of this low-risk herbicide on mudflat fauna. The WSNWCB hopes that the permit will be extended to all commercially managed shellfish beds in Washington once imazamox is deemed safe enough to use, based on the EIS and the preliminary data collected from clam beds. That way, all commercial shellfish growers will have a valuable tool to manage Japanese eelgrass if they so choose. This is especially important in areas where Japanese eelgrass is not yet widespread and there is a chance to eradicate small infestations before they expand, using whatever IPM tools are best suited for the infestation size and location. The WSNWCB would urge Ecology to stay apprised as new research becomes available about the impacts of Japanese eelgrass. If it is demonstrated that this species may have specific detrimental effects in natural tideland areas, it may be prudent to expand the scope to allow resource managers and others to have the option of using imazamox to control Japanese eelgrass as well. To reiterate, however, the initial limited-scope general permit being issued now is absolutely the correct the first step and we appreciate your efforts.

Sincerely,

A handwritten signature in blue ink that reads "Alison Halpern".

Alison Halpern, Executive Secretary, WSNWCB  
cc: Butch Klaveano, Chairman, WSNWCB