

DEPARTMENT OF ECOLOGY

19Oct2012

OCT 23 2012

Memo

WATER QUALITY PROGRAM

Dir. WDOE  
Wesley@DOR Sturdavant & Hamil

Subject: Cmts on the DS for Spraying Ellgrass in Willipa Bay  
& a PR Request

From: Rob Kavanaugh *RYK*

You are correct in requiring an EIS for this highly controversial, damaging, and idiotic project sponsored by the Clam Growers of Grays Harbor and Willipa Bay as well as WDOE, WDFW, and Kim Patten. It is good to see H2OQ Permitting and the SEPA group are finally communicating. Now at least the EIS will look legitimate perhaps. It is indeed distressing to see the influence on WDOE/WDA by special interest groups is it not. I guess everyone is up for the pressures from Rep. Blake as well?

My comments on the EIS DS format and my concerns, legal and others:

- 1) The proposal is unlawful and violates the Shorelands Act. All three ellgrass species are protected.
  - 2) The project describes a test? Spraying 500 acrs out of 55,000 acs. is hardly defined as a "test".
  - 3) Patten has already completed his one ac. amazonox test and found it kills all ellgrass. Ca. F&G did the same in Humbolt Co. Ca. along with eight other methods. The WDFW and Pac. Co. have already sprayed ellgrass in Willipa Bay during the spartina sprays ops and found it kills everything green.
  - 4) We learn WDOE does not follow the monitoring plans, and will *(HAMIL)* a copy. ie WDFW, UW, WDOE, DNR etc. Please send me a copy. RCW42.52
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- ✓ The many benefits of ellgrass to water quality conditions in Willipa Bay need to be described and quantified. ie toxics, FC, sediments etc are being ignored. Please describe the economic benefits of all species of ellgrass to h2oq, vertebrates, invertebrates, ESA species, waterfowl, crabs, herring etc.
  - ✓ We have data from Florida that gives a \$ figure for 50,000<sup>ac</sup> of sea grasses as \$1 billion to the total biological, social, and economy. (fish, shellfish, h2oq etc.
  - ✓ Is Patten an honest broker or just a mouthpiece for Taylor Shell fish? Please explain the relationship between WSU and the Clam Growers. Who pays who to say what? Quien sabe?
  - ✓ Explain the fact that herring <sup>are</sup> spawning in ellgrass in Willipa!
  - ✓ Explain the incestuous role of Limited Agents with WDA and WDOE and how the monitoring plan will be enforced and what happens when WDOE fails to enforce the Clean Water Act as is now the case? *(Spartina EIS)*
  - ✓ To be quite frank I see the potential for violations of our Ethics Code once again. ~~by the way~~. Everything is for sale if the stakes are right. Watch out for WDFW & WDA!
  - ✓ Send me a copy of the monitoring plan and all cmts by UW. A PR request.

cc. Barkhurst  
Brewer  
Hendricks  
Cohen

*Handwritten initials*

Pacific County  
(Willapa Bay and Others)

Aquaculture Revenue for BI Year 2011  
Fiscal Months 1 - 24, All Aquatic Trusts

BI 2011 = 7/1/2009 - 6/30/2011  
Total Shellfish Rev \$173,690.50

Contract Number	County	TOTAL
	PACIFIC COUNTY	984.35
	PACIFIC COUNTY	596.36
	PACIFIC COUNTY	266.98
	PACIFIC COUNTY	1,002.10
	PACIFIC COUNTY	551.02
	PACIFIC COUNTY	629.79
	PACIFIC COUNTY	534.08
	PACIFIC COUNTY	635.85
	PACIFIC COUNTY	515.11
	PACIFIC COUNTY	741.62
	PACIFIC COUNTY	804.15
	PACIFIC COUNTY	838.31
	PACIFIC COUNTY	264.11
	PACIFIC COUNTY	94.70
	PACIFIC COUNTY	2,050.13
	PACIFIC COUNTY	461.18
	PACIFIC COUNTY	74.95
	PACIFIC COUNTY	914.28
	PACIFIC COUNTY	428.61
	PACIFIC COUNTY	8.80
	PACIFIC COUNTY	545.61
	PACIFIC COUNTY	733.42
	PACIFIC COUNTY	1,294.27
	PACIFIC COUNTY	888.16
	PACIFIC COUNTY	776.98
	PACIFIC COUNTY	533.11
	PACIFIC COUNTY	2,717.40
	PACIFIC COUNTY	296.45
	PACIFIC COUNTY	2,786.86
	PACIFIC COUNTY	127.18
	PACIFIC COUNTY	238.39
	PACIFIC COUNTY	343.46
	PACIFIC COUNTY	629.66
	PACIFIC COUNTY	1,824.89
	PACIFIC COUNTY	505.03
	PACIFIC COUNTY	125.19
C2000013364	PACIFIC COUNTY	169.48
C2000013364	PACIFIC COUNTY	(169.48)
C2000A12552	PACIFIC COUNTY	309.76
C2000071026	PACIFIC COUNTY	556.27
C2000071026	PACIFIC COUNTY	24.98
C2000077548	PACIFIC COUNTY	70.41
C2000A12373	PACIFIC COUNTY	37.06
C2000A12374	PACIFIC COUNTY	24.62
C2000A12375	PACIFIC COUNTY	32.91
C2000A12381	PACIFIC COUNTY	24.16
C2000A12709	PACIFIC COUNTY	39.80
C2000A13027	PACIFIC COUNTY	4.89
C2000B12821	PACIFIC COUNTY	8.46
C2000013271	PACIFIC COUNTY	494.87
C2000013272	PACIFIC COUNTY	610.87
C2000A12549	PACIFIC COUNTY	530.89
C2000A12550	PACIFIC COUNTY	964.36
C2000A12757	PACIFIC COUNTY	513.10
C2000A12780	PACIFIC COUNTY	605.05
C2000B12807	PACIFIC COUNTY	772.55
C2000B09998	PACIFIC COUNTY	(454.27)
C2000B09998	PACIFIC COUNTY	(454.27)
C2000B09998	PACIFIC COUNTY	(419.31)
C2000B09998	PACIFIC COUNTY	(431.64)
C2000B09998	PACIFIC COUNTY	454.27
C2000B09998	PACIFIC COUNTY	(454.27)
C2000B09998	PACIFIC COUNTY	395.10
C2000B09998	PACIFIC COUNTY	399.88
C2000B09998	PACIFIC COUNTY	411.64
C2000B09998	PACIFIC COUNTY	430.12
C2000A12364	PACIFIC COUNTY	1,913.32
C2000B09754	PACIFIC COUNTY	57.64

Data Source: DNR Reports Portal - Revenue Summary by Fund with Industry and Condition  
Data Pull Date: March 27, 2012