

From: [jjnm](#)
To: [Hamel, Kathy \(ECY\); ECY RE Japanese Eelgrass Permit Comments](#)
Subject: Imazamox
Date: Friday, November 02, 2012 4:59:11 PM

Dear Ms. Hamel: Please find my earlier comments which I would like to have submitted in response to the current request for comments on whether the application of imazamox on commercial shellfish beds is appropriate. In addition to those which follow, I would also like to include consideration of an analysis of whether ceasing chemical application to eradicated Ghost shrimp be considered as an alternative to dealing with concerns about Japonica in the EIS. As pointed out in the White Paper, Ghost shrimp's activity in the sediments creates an environment which Japanese eelgrass are averse to. As the eradications of Ghost shrimp creates a firmer sediment which in turn Japonica is able to take hold in it would seem appropriate to determine if the return of Ghost shrimp, a native species, is an appropriate method. As before, thank you for your consideration of my comments. Jules Michel

Dear Ms. Hamel:

I am writing in opposition to approval of a permit to allow for the application of Imazamox for use in the eradication Japanese eelgrass. There have been no peer reviewed studies I am aware of which show the benefits provided by this species of aquatic vegetation are outweighed by any perceived harm in Puget Sound. While there have been papers written about the effects of this species on the size of Manila clams and economic difficulties created in some shellfish beds located in Willapa Bay this should not be reason enough to allow for the widespread application of Imazamox, whether limited to commercial shellfish farms or otherwise.

I propose the following steps first be taken, after which a more educated decision may be made:

1. A cost/benefit analysis should be performed on removal by hand and mechanical means versus the cost and risk found in the application of this chemical.
2. Studies on the habitat functions provided by Japanese eelgrass should be initiated, focusing specifically on the use by forage fish and migratory water fowl of this species for survival. These studies should look specifically at its use by forage fish for use in spawning and for protection in their early stages of life. In addition, these studies should also determine how dependent migratory and resident water fowl are on this species as a food source and whether suitable alternatives exist should it be eradicated.
3. Controlling the migration of Imazamox should be a focus of additional studies to ensure there is no secondary harm created through the spread of this chemical to unintended aquatic plant species. This study should take place on a small scale, not a geographically broad landscape as is proposed in the current proposal.
4. A clear and concise definition of what a "commercial shellfish bed" needs to be stated so the public - and the Department of Ecology - are fully aware of areas potentially impacted.

One of the major reasons Japanese eelgrass has become a perceived problem is due to the application of Carbaryl which has eliminated Ghost shrimp in the intertidal area on commercial shellfish farms. The unintended consequence was a change in sediment density more suitable for Japanese eelgrass to grow in. It is critical to everyone for this decision to be made on information founded on science, not on opinions, in order to avoid another set of unintended consequences spreading throughout the marine waters of Puget Sound.

Thank you for this opportunity to help shape what the future of Puget Sound, Grays Harbor and Willapa Bay will be.

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