October 29, 2012

To: Kathy Hamel, WA Dept. of Ecology
PO BOX 47600
Olympia, WA 98504

From: Dick Sheldon, Willapa Resources
PO BOX 365
Ocean Park, WA 98640

Subject: General Permit for Control of Japonica in Willapa Bay

As a previous responder to this issue I am more convinced that Japonica on the intertidal flats of Willapa Bay must be immediately controlled if the Willapa Estuary's natural functions are to be saved. The takeover by Japonica and subsequent destruction of irreplaceable habitat that makes Willapa Bay a national treasure must be stopped.

Willapa Resources was created in 2007 to continue 60 years of environmental and land development oversight of the shore land, bed lands, and water quality of Willapa Bay, previously done through Northern Oyster Co. Consultation services ranging from mechanical to environmental aspects of shellfish farming are available. Willapa Resources is supported by these activities and its Willapa shellfish operation.

This is not a Japonica vs. shellfish grower issue. Like Spartina it is a Japonica destroying the intertidal habitat issue. However, it's being handled in the same fashion that nearly lost the spartina battle. A battle, that had agencies responded aggressively, would have been won in two or three years instead of fifteen with a cost 80-90% less than the latest figures. The bay will never truly recover from the Spartina fiasco, as it will not from Japonica handled in the same timid manner.

Beyond political cover there is no legitimate reason to limit Japonica control to clam beds. Japonica covers all beds equally in its intertidal range. It affects all infested areas the same, starving out shellfish, destroying underlying prey species habitat, including smelt spawning grounds, smothering and changing PH in ways that historic inhabitants must relocate or die.

Not only should this permit not protect Japonica, except for clam beds, common sense dictates all Willapa bed lands be eligible for salvations.

By DOE's reluctance it's obvious that DOE's upper level deciders have never taken a step into the Japonica morass. My advice to said "deciders", pull on your boots and actually struggle through this mess to see for yourselves. Maybe then we won't be forced to suffer through another Spartina fiasco.

Dick Sheldon
Willapa Resources

October 30, 2012

To: Kathy Hamel – Permit Writer
WA Dept. of Ecology
PO BOX 46600
Olympia, WA 98504-7600

From: Dick Sheldon
Willapa Resources
PO BOX 365
Ocean Park, WA 98640
360-665-4886

Subject: Scoping – EIS – Japonica Control in Willapa Bay

Japonica is changing the natural systems in Willapa Bay. It is displacing and killing prey species for endangered and threatened fishes. It is doing the same for all marine fishes and mobile species dependent on Willapa Bay's sand dominant intertidal feeding grounds.

Recreational shellfish beds on public grounds are being swallowed, silted and destroyed by this exotic weed. Sloughs are being plugged changing drainages necessary in supporting tidal flows required in rejuvenation processes in tidal cycles. Feeding grounds for migratory birds are being altered with probably negative impacts. Prey and plant types in the expanding areas of new Japonica infestations will continue to be eliminated by this spreading monoculture. Willapa Bay's critical migratory refueling station is definitely being altered and less hospitable for many of the diverse bird species now using its marine sand flats. Some water fowl species likely feed upon surface Japonica as an opportunistic event. However, this is not the historic food utilized by them over the previous thousands of migrations and the gross impact of Japonica must be judged in this light in its importance as duck food.

I am submitting these foregoing subjects as issues that as a public agency responsible for protection of public lands and recreational priorities, WA Dept. of Ecology, is required to address,

Shellfish beds, both public and private, are rated the No. 1 habitat in Willapa Bay as to their contribution to the wild marine system. They offer both protection and furnish the highest diversity of prey species for juvenile and general fish populations in an estuary without rocks, gravel, or other protective cover. Japonica is smothering both clam and oyster beds, again both public and private, in its entire intertidal range limiting this EIS as DOE intends is short sighted and wasting of Washington resources. In any case infected oyster beds should be included through common sense.

Areas of Discussion:

1. Potential Environmental Impact on Control Methods. The use of physical removal by hand or mechanical means is not practical. See Alternatives 3 and 4.
2. Human Health Effects. None beyond usual physical work related.
3. Efficacy of Various Methods. The only one effective to date is harrowing several times per season. This is expensive, puts power equipment on the grounds, with related compaction, and kills clams with the potential of oil and fuel contamination. The most damage is caused by uprooting the plants which are carried by tidal action to infect neighboring and bay wide beds.
4. Impact if Not Managed. Please refer to the preceding sections of this submittal and add: The demise of shellfish growing capability of most all of Willapa's commercial fattening beds, elimination of expansion of Willapa's heretofore increasing clam operations with a major drop in Pacific County's primary and longest established economic driver, aquatic shellfish farming and production. This also includes ocean crab because of destroyed juvenile protective habitat and feeding grounds.

Alternatives:

1. Integrated Pest Management: Refer to No. 3 above. Beyond the physical removal, there are no feasible alternatives to substitute for clam cultivation as presently done.
2. Refer to preceding sections.
3. Refer to preceding sections 3 – 1, 2,
4. To my knowledge there is no available biological control available that would be acceptable or practical.
5. The proposed action is proven effective, is already tested in wet environments and to my knowledge has no major negative impacts on non-target species.

Dick Sheldon
Willapa Resources