



Willapa-Grays Harbor Oyster Growers Association
P.O. Box 3 Ocean Park, WA 98640

November 4, 2019

Jon Jennings
Washington Dept. of Ecology
P.O. Box 47696
Olympia, WA 98504

Dear Mr. Jennings,

The members of the Willapa-Grays Harbor Oyster Growers Association (WGHOGA) appreciate the opportunity to provide comments on the renewal of the National Pollution Discharge Elimination System (NPDES) general permit that allows for the control of the invasive *Zostera japonica* on commercial clam beds in Willapa Bay. As you are aware, *Zostera japonica* is a highly invasive species classified as a Class C noxious weed in Washington State. It continues to spread along the West Coast with devastating impacts to the many species that utilize these productive tidal habitats. On these productive tidelands *Zostera japonica* increases sedimentation, increases water surface and sediment temperatures, alters benthic invertebrate assemblages and creates anoxic sediment conditions. These conditions create unsuitable habitat for many benthic organisms especially cultivated clams. When large mats of *Zostera japonica* form they have devastating effects on clam populations, including a marked decrease in juvenile clam recruitment, slowed growth, reduced meat weight and increased predation.

Since 2014 shellfish farmers in accordance with the general permit have been able to successfully mitigate the negative impacts of *Zostera japonica* in Willapa Bay using precise treatments of the herbicide Imazamox. Imazamox is registered for use by the U.S. Environmental Protection Agency for use in aquatic environments and is nontoxic to animals. Limiting the permit to commercial clam grounds prohibits agencies and other land owners from effectively managing *Zostera japonica* throughout Washington State. The treatment buffers and current monitoring efforts are effective at protecting native seagrass beds that are located much lower in tidal elevation. The fact that clam beds are being treated on a rotation and native seagrass beds are thriving demonstrates that the permit as written is working well and can be deemed a success. The proposed changes to the permit are consistent with how record keeping and reporting is currently taking place and will not cause any confusion. Currently the pre-treatment plans are due prior to the spring tides making some site visits difficult. Moving the pre-treatment plan due dates to later in the spring should result in better management decisions for both farmers and public land managers.

Sincerely,

David Beugli
WGHOGA