

OCT 22 2019

WATER QUALITY PROGRAM



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To whom it may concern and ECY

While it is very appreciated that the permit for the control of *Zostera Japonica* was approved as a tool for the last 5 years, and that the public may have the opportunity to comment on the renewal, the Grays Harbor and Pacific Conservation Districts are confused and concerned. First, we do not feel it was necessary or required to put the permit through this scrutiny for renewal. The permit, minus some very insignificant changes, has not changed enough to warrant this process. Second, the districts are concerned that this is an attempt to cancel the permit. Both Districts are in favor of the renewal of the permit.

However, the districts find it necessary to point out that the permit does not do enough to protect the health of the two large estuaries on Washington State's Coast line from this invasive. We have attached the letter submitted to Washington State Noxious Weed Control Board in 2012. In recap, it is still not understood why for the first and only time a designation or permit be issued solely on production type, such as commercial clam beds and not commercial oyster beds. This should be remedied by allowing treatment on both types of operations. As a reminder, California has an all out war against the species.

Japonica has transformed thousands of acres of highly aerobic tideland into more anaerobic muck that actually provides habitat for other destructive invasive species. The claim that fish or waterfowl need *Japonica* is not factual. Waterfowl have been in our area throughout time, and survived fine without any *Japonica*. Even if they did need *Japonica*, there are tens of thousands of acres of it with only an average of about 200 acres per year being controlled. While fish don't need it at all, there have been many cases where fish are found stranded at low tide because they become lost or tangled in it as the tide lowers. It also holds water on the tidelands at low tide, and in summer this water turn into a high temperature putrid soup clearly damaging the species trying to survive where *Japonica* has infested their habitat. Another critical issue is that *Japonica* out competes our native eel grass, and is slowly pushing it out of deeper areas in the bay.

Please keep vigilant, please reissue the permit for the control of *Zostera Japonica*.

Mike Nordin
Manager
Grays Harbor and Pacific Conservation Districts

DATE: March 7, 2012

TO: Washington State Noxious Weed Control Board
Noxious Weed Committee
FROM: Pacific Conservation District
RE: Addition of *Zostera japonica* to State Noxious Weed C List without the inclusion of
"Class C noxious weed on commercially managed shellfish beds only"

To whom it may concern,

On behalf of the Pacific Conservation District Board of Supervisors we would like to request that japonica be listed as a "class C Noxious weed" for all lands in Pacific County. While it was a good decision to list all commercial shellfish properties, this does not serve the needs of all property owners and land managers who wish to control Japonica on their property in Pacific County and Willapa Bay.

Common Names: Japanese eelgrass

Latin Name: *Zostera japonica*

Native Range: Asia, specifically the far east of the Russian Federation, China (Hebei, Liaoning and Shandong), Japan, Korea, Taiwan and Vietnam.

Escaped/Naturalized: Western Washington's bay and estuaries (Willapa, Grays Harbor, Puget Sound)

Pacific Conservation District Board's key points of view:

1. There are thousands of acres of japonica that have infested lands in Willapa Bay. The amount of lands shellfish growers will be able to control represents a fraction of the total acreage.
2. There are several other stakeholders, land owners and managers who need the ability to manage their property for noxious weeds.
3. Japonica does not recognize property lines and its impact on lands other than shellfish beds is the same as on commercial shellfish beds. Lands being managed for recreational use are impacted equally, and to preserve these lands for the benefit of the public, managers need to be able to manage noxious weeds. Many private land owners pursue shellfish gardening and japonica must be allowed to be managed for private landowners to use their tidelands as they intend. Pacific County has significant higher intertidal acreage and must preserve the ability to manage these lands as it sees fit for the benefit of the public under its weed management program.

4. Data used to support limiting control to commercial shellfish beds does not exist. Input in opposition to controlling this noxious weed is speculative and many times is refuted by actual data and research. The main items used to oppose controlling japonica were based on migratory birds and their use of japonica as a replacement for native Eel grass. The acting agency for those opposing adding japonica to the weed list was Washington Department of Fish and Wildlife (WDFW). WDFW refer to both these items as rational for protecting japonica, but offer no data beyond the speculation of some of their staff. In regard to migrating birds, while a few species do eat japonica, it is not required for their survival. These birds eat the japonica because it is there and have survived throughout history without japonica.

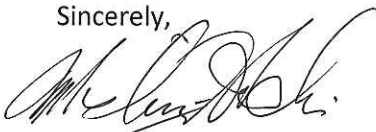
There is no data to support using japonica to replace native Eel grass. The current theory is that if native grass disappears then japonica can somehow be substituted for fish habitat. This is an unachievable goal regarding the increase of grass in Puget Sound. This effort is futile and unnatural because forcing non-native grass to grow where it does not naturally exist could and most likely have negative impacts on other native species. Willapa Bay does not have an issue with naturally recruiting native grasses, which is documented in data.

5. There are financial concerns to consider. The cost to shellfish farmers will be staggering and the inability to effectively manage other lands could negatively impact recreational opportunities. Also, the loss of future opportunities, where the county or other land managers may decide to try and develop more opportunities for the public, will necessitate the ability to control this noxious weed.
6. Adding all lands in the county or counties does not require any new control. What a Class C Designation without any stipulations does do is allow each county the ability to make their own decisions on control programs. Counties are capable of making local decisions to reflect their needs, which we believe the State Weed Board understands.
7. At the Washington State Weed Board hearing it was evident that most of the Board would have supported including all lands under the class-C listing. The Conservation does not agree to limit control to only commercial shellfish beds.

A Class C Designation does not force control, but people should have the right to manage their property for invasive noxious weeds in Pacific County if the landowner chooses to do so. If Puget Sound counties decide they do not want control, then Puget Sound counties have that choice.

Please let us know if you need any more help on this or contacts. Thank you for your time and consideration.

Sincerely,



Mike Nordin, Manager
Pacific Conservation District