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## Reject Imazamox Permit Renewal for Shellfish Beds in Willapa Bay and Grays Harbor

As a resident of the Pacific Northwest, I want to emphasize what our bays, marine waters, and the wildlife they support mean to me. The Department of Ecology must not allow the shellfish industry to spray dangerous herbicides into Willapa Bay and Grays Harbor that kill valuable eelgrass habitat.

Washington is home to many iconic endangered species like the salmon and orcas that rely on eelgrass. These species and their prey rely on eelgrass habitat in Willapa Bay and Grays Harbor (which is also home to two National Wildlife Refuges).

Despite the decline of eelgrass and other seagrasses across the world, shellfish growers successfully got “introduced eelgrass (*Z. japonica*)” classified as a noxious weed just so they can grow more clams per acre.

But like native eelgrass, introduced eelgrass also provides essential ecosystem functions like food, shelter, and habitat stabilization for numerous species. Like native eelgrass, introduced eelgrass also assists in nutrient cycling and climate change mitigation. The Department of Ecology acknowledges this, but is still going forward with unmonitored spraying of eelgrass beds.

New science shows that the tidal flushing of Willapa Bay is not nearly as quick as previously assumed. This means that herbicides sprayed on shellfish beds will stick around in Willapa Bay for longer than previously assumed, with greater potential to impact native eelgrass and other species.

As experts have stated, there is no sound reason to allow the direct spraying of any native eelgrass, including on commercial clam beds. Given the benefits of introduced eelgrass, the impacts of herbicides to the Bay and other species, and the significant data gaps, this under-studied plan should not move forward.

The Department of Ecology has allowed the unmonitored spraying of eelgrass with the herbicide imazamox for five years. This must stop.

Because of the permit buffer rules, growers who sprayed imazamox were not required to monitor impacts to eelgrass outside of their plots, so thousands of acres were sprayed over the last five years without any monitoring of off-site impacts.

With over 60% of Willapa Bay’s tidelands used for commercial shellfish aquaculture for decades, the Department of Ecology and other state agencies should be evaluating the impacts to eelgrass from years of this intensive shellfish cultivation, not allowing synthetic herbicide use to decimate eelgrass further.

Herbicides do not belong in Willapa Bay and Grays Harbor. The Department of Ecology failed to evaluate any alternatives that are more environmentally protective than spraying herbicides to kill eelgrass or conduct any review of the impacts on the ground after five years of spraying.

The Department of Ecology has a duty to protect the environment and water quality under state and federal law. It must not cave to the shellfish industry and allow industry to kill valuable species just because it wants to grow more commercial shellfish. I urge the Department of Ecology not to move forward with a spray permit for imazamox on shellfish beds in Willapa Bay and Grays Harbor.