FirstName LastName Email Address01 City State Zip SubmitDate CommentValue Lawren Pulse lawren@wellaroo.con 659 Wynooche Valley Rd Montesano WA 98563 11/4/2019 "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." Lyn Z Page kinaca@centurylink.net 10606 NW 21st Ave Vancouver WA 98685 11/4/2019 "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

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forward with a spray permit for imazamox on shellfish beds in Willapa Bay and Grays Harbor." Barbara Wight bawight@frontier.com 23013 898th Ave W # B Edmonds WA 98026 11/4/2019 "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." Lynne Oulman lynne.oulman@gmail.com 816 14th St Bellingham WA 98225-6304 11/4/2019 "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

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on shellfish beds in Willapa Bay and Grays Harbor." Kate O'Brien Kambiri@comcast.net 5010 47th Ave S Seattle WA 98118 11/4/2019 "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." Alexandria Falcon alexfalcon@charter.net 1429 Huntington Pl Walla Walla WA 99362 11/4/2019 "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 ot her species. As experts have stated, there

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allendelliottaia@gmail.com PO Box 743 La Conner WA 98257 11/4/2019 "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." David Jessup davidj57@yahoo.com 95 Hoare Rd Port Angeles WA 98363 11/4/2019 "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

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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." James Ploger jploger@gmail.com 1909 S Charles St Seattle WA 98144 11/4/2019 "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

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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." Nannette Taylor nannette.taylor@gmail.com 19402 SE Stark St Apt 8 Portland OR 97233 11/4/2019 "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." Michael Burmester mike.burmester625@gmail.com 10829 SE Happy Valley Dr Happy Valley OR 97086 11/4/2019 "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

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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." Linda Alstad lalstad@q.com 383 Suncrest Ave NW Salem OR 97304 11/4/2019 "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." David Laws davidmlaws@hotmail.com 1718 Valencia St Null Bellingham WA 98229 11/4/2019 "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

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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." Stephanie West stephaniekwest@gmail.com 1633 Millbrook Dr Lodi CA 95242 11/4/2019 "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." Philip Chanen pchane@comcast.net 2573 Shoreland Dr S Seattle WA 98144 11/4/2019 "Reject Imazamox Permit Renewal for Shellfish Beds in Wil lapa 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

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on shellfish beds in Willapa Bay and Grays Harbor." Donna Leavitt donnaleav@gmail.com 22415 85th Ave W Edmonds WA 98026 11/4/2019 "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 herbicide s 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." Adam McDuff adammcduff@gmail.com 1242 Hensley St NE Olympia WA 98516 11/4/2019 "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

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1422 Flower Ave Port Orchard WA 98366 11/4/2019 "Reject Imazamox Permit Renewal for Shellfish Beds in Willapa Bay and Grays Harbor As a resi dent 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." Lynn And Roger Stapes Stapes@aol.com 81607 Lost Creek Rd Dexter OR 97431 11/4/2019 "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

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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." Lori Stark llsmm@me.com 17478 Ne123rd Way Redmond WA 98052 11/4/2019 "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, an d the significant data gaps, this

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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." Hannah Harrison hharrison@cityword.net 2440 Van Buren St Eugene OR 97405 11/4/2019 "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." Diane Luck dianeluck@mac.com 3204 NE 27th Ave Portland OR 97212 11/4/2019 "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

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on shellfish beds in Willapa Bay and Grays Harbor." Louise Gilman louiseanded@scattercreek.com 7138 Nanitch Ln SE Tenino WA 98589 11/4/2019 "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." Stephen Oder steve.oder@gmail.com 1865 1/2 NE Seavy Ave Mill City OR 97360 11/4/2019 "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

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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." Annapoorne Colangelo anapuna@whidbey.com 7651 Scatchet Head Rd Clinton WA 98236 11/4/2019 "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." Judith Cohen jctcohen@yahoo.com 1608 Erepublican ST9811 Seattle WA 98112 11/4/2019 "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 speci es 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

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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." Klaudia Englund klaudia.englund@gmail.com 7630 Cypress Way Anacortes WA 98221 11/4/2019 "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 eelgra ss 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." Dorinda Kelley dorindask@gmail.com 314 NE 53rd Ave Portland OR 97213 11/4/2019 "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

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not to move forward with a spray permit for imazamox on shellfish beds in Willapa Bay and Grays Harbor." Andrew Libonati planetgreenstar@gmail.com 159 Sky Vista Pl Camano Island WA 98282 11/4/2019 "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 sal mon 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." James Bates james.bates3@comcast.net 6821 44th Ave NE Seattle WA 98115 11/4/2019 "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

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and Grays Harbor." John Altshuler tomailakai@comcast.net 2910 Grand Cayman Dr Eugene OR 97408 11/4/2019 "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." Susan Delles sdelles@jeffnet.org 2801 Sykes Creek Rd Rogue River OR 97537 11/4/2019 "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

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97223 11/4/2019 "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." Jamie Fillmore jfillmore66@gmail.com 9174 SW Waverly Dr Portland OR 97224 11/4/2019 "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

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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." Michelle Jordan michellej2@charter.net 723 Reiten Dr Ashland OR 97520 11/4/2019 "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

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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." Amy Roberts homerjim82@gmail.com 2883 NW Sunny Ln Albany OR 97321 11/4/2019 "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." Linda Cornell CORNELL.LC@GMAIL.COM 1400 NE 14th Pl Canby OR 97013 11/4/2019 "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

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on shellfish beds in Willapa Bay and Grays Harbor." Mary Johnson mjuniverse@yahoo.com 11018 Lobelia Ave NW Silverdale WA 98383 11/4/2019 "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." Craig Weakley cwncp@comcast.net 2714 17th St Anacortes WA 98221-1330 11/4/2019 "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

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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." Martin Robbins mcrobbins72@gmail.com 36373 River Point Dr Astoria OR 97103 11/4/2019 "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." Colleen Ozora colleenozora.artist@gmail.com 2627 Walnut St Bellingham WA 98225 11/4/2019 "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.

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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." Randy Harrison ran6711@comcast.net 4051 Wagner St Eugene OR 97402 11/4/2019 "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." Adele Dawson 9977440@gmx.net 347 Hemlock St Florence OR 97439 11/4/2019 "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 eelgras s, 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

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forward with a spray permit for imazamox on shellfish beds in Willapa Bay and Grays Harbor." Sandi Cornez scfreegalz0@gmail.com Sandicornez Gmailcom Portland OR 97219 11/4/2019 "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 decimat e 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." Jeff Freeman cosmicjeff@gmail.com 29090 SW Heater Rd Sherwood OR 97140 11/4/2019 "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

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Harbor." Karen Horton onlyjustbegun40s@gmail.com 4311 Independence Hwy Independence OR 97351-9800 11/4/2019 "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." Eric Lambart spambo@nomeaning.net N OATMAN Ave Portland OR 97217 11/4/2019 "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

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Caroline St Port Angeles WA 98362 11/4/2019 "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." Ray West rawest70@centurylink.net 41678 Ogier Ln Astoria OR 97103 11/4/2019 "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

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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." Judy Wilcox judytaylorwilcox@comcast.net 1030 SW 17th Way Troutdale OR 97060 11/4/2019 "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

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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." Jenet Johnsen jenetjohnsen@gmail.com 1 Corral Ln Unit 20 Ashland OR 97520-9468 11/4/2019 "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

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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." Leslie Langdon lplangdon@comcast.net 2812 Niagara St Bellingham WA 98226 11/4/2019 "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." Rebekah Baldwin pritchett70@hotmail.com 16211 81St Avenue Ct E Puyallup WA 98375 11/4/2019 "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 nativ e 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

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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." Stephen Zettel hakuchi9@icloud.com 25 Katt Ct Sequim WA 98382-7391 11/4/2019 "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." Bill O'Brien wobobr123@yahoo.com 12520 SW Gem Ln Apt 202 Beaverton OR 97005 11/4/2019 "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

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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." Rebecca Crowder bjcoast@gmail.com 4420 Inwood Ln Eugene OR 97405-2052 11/4/2019 "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, intro duced 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." Laurie Fleming ljfquilts@hotmail.com 2724 E 44th Ave Unit D Spokane WA 99223-4416 11/4/2019 "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

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imazamox on shellfish beds in Willapa Bay and Grays Harbor." Robby Robinson robbrobinsonvo@icloud.com PO Box 238 Copalis Beach WA 98535 11/4/2019 "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." Brent Rocks brent_rocks@comcast.net 1518 SW Upper Hall St Null Portland OR 97201 11/4/2019 "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.

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227th Pl SW Edmonds WA 98020 11/4/2019 "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." Eileen Correia eileen@full-moon.com 139 Morris Rd Randle WA 98377 11/4/2019 "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.

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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." Ryland Helt Rylandhelt@gmail.com 1250 Dry Creek Rd Mosier OR 97040 11/4/2019 "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 fu nctions 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

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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 H arbor. 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." T Jeffries tjeffries77@yahoo.com 1455 NW Ithaca Ave Bend OR 97703 11/4/2019 "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

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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." Renee Wick reneewick1@icloud.com 24 HUNTER Veneta OR 97487 11/4/2019 "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." Gwen Nolte gwennolte@aol.com 9227 N Lake Dr SW Apt 5 Lakewood WA 98498 11/4/2019 "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

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of Ecology not to move forward with a spray permit for imazamox on shellfish beds in Willapa Bay and Grays Harbor." Lori Erbs lorieji@cs.com 5310 Marda Ln Acme WA 98220 11/4/2019 "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." Stephen Wilson stevetall@charter.net 460 Salishan Hills Dr Gleneden Beach OR 97388 11/4/2019 "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.

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Richard Grassl solid4evr@yahoo.com 907 W Henry St Pasco WA 99301 11/4/2019 "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." Tom Gilbrough tomg48@comcast.net 41403 N COOK St Apt B16 Spokane WA 99207 11/4/2019 "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,

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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 unmonitore d 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." Elizabeth Erfurth serfurth@comcast.net 1890 Tigertail Rd Eugene OR 97405 11/4/2019 "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

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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." Debra Chang jazzkoo@hotmail.com 2500 H St Bellingham WA 98225 11/4/2019 "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

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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." Stephanie Prima misc17@musetta.us C/O John Malenic Friday Harbor WA 98250 11/4/2019 "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." Janna Piper jaqalthehybrid@yahoo.com 14865 SW 74th Ave Ste 110 Portland OR 97224 11/4/2019 "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

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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." Alan Liechty alanliechty@yahoo.com 5024 NE Flanders St Portland OR 97213 11/4/2019 "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 in dustry 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." Randall Esperas resperas@gmail.com 16879 Jacinto Rd Bend OR 97707 11/4/2019 "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

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on shellfish beds in Willapa Bay and Grays Harbor." Dan Schneider dannny83@q.com 814 NE 84th St Seattle WA 98115 11/4/2019 "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 mean s 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." P Perron patriciaperron@hotmail.com 1718 Melrose Ave Seattle WA 98122 11/4/2019 "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

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WA 99156 11/4/2019 "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." Joanna Lee jlee@centerforfoodsafety.org 1847 Massachusetts Ave SE Washington DC 20003 11/4/2019 "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.

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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." D Stirpe dolcezza077@yahoo.com 2311 SE ASH311 SE Ash Portland OR 97214 11/4/2019 "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

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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." Sheryl Sparling ssparling47@mac.com 1832 Pine Cir Lynden WA 98264-9121 11/4/2019 "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 spe cies. 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." Patricia Rodgers patriciam@clearwire.net 8121 NE 141st St Kirkland WA 98034 11/4/2019 "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

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not to move forward with a spray permit for imazamox on shellfish beds in Willapa Bay and Grays Harbor." Frances Elder felder880@gmail.com 1330 Avenue D Apt D Snohomish WA 98290 11/4/2019 "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." Janet Doerr doerr@comcast.net 14140 SW 98th Ct Tigard OR 97224 11/4/2019 "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

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on shellfish beds in Willapa Bay and Grays Harbor." Justice Boyd justiceboyd@hotmail.com 8852 SW Waverly Dr Tigard OR 97224 11/4/2019 "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." Randal Bonney rtbonney@comcast.net 450 W 29th Ave Eugene OR 97405 11/4/2019 "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

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alantanya98112@yahoo.com 2312 16th Ave E Seattle WA 98112 11/4/2019 "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." Elizabeth Grant elizabeth.grant@goldenprotective.com 2895 Valpak Rd NE Salem OR 97301 11/4/2019 "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

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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 sou nd 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." Collin K Fleming collinkfleming@gmail.com 15197 Thayer Rd Oregon City OR 97045 11/4/2019 "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

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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." Barbara Comnes barbara.comnes@gmail.com 1030 NW 12th Ave Apt 123 Portland OR 97209 11/4/2019 "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." Kate Blessing kateblessing@rocketmail.com 1727 45th Ave SW Seattle WA 98116 11/4/2019 "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

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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." Dwight Long oh-otter@charter.net 6523 Valhalla Ave Klamath Falls OR 97603 11/4/2019 "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." Amy Christenson mybluedragonfly@hotmail.com 486 Tulipan Way Talent OR 97540 11/4/2019 "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

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on shellfish beds in Willapa Bay and Grays Harbor." Doug Gibson dgm@wvui.com 39915 Mad Creek Rd Gates Gates OR 97346 11/4/2019 "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." Bridget O'Brien mad.maeve@gmail.com 527 Eastlake Ave E Seattle WA 98109 11/4/2019 "Reject Imazamox Permit Renewal for Shellfish Beds in Willapa Bay and Grays Harbor As a resident of the Pacif ic 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

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Riverside Ln Apt 5 Portland OR 97239 11/4/2019 "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 sig nificant 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." Phyllis Reynolds Choirmompr@gmail.com 5434 River Rd N # 240 Keizer OR 97303 11/4/2019 "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.

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Shellfish Beds in Willapa Bay and Grays Harbor As a resident of the Pacific Northwe st, 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." Saliha Abrams juniperberry11@gmail.com 1937 SE 112th Ave Portland OR 97216 11/4/2019 "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

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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." Jennifer Wyatt fairyinoz3@comcast.net 10009 Dibble Ave NW Seattle WA 98177 11/4/2019 "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 Depa rtment 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." John Dubois ferdy.feghoot@gmail.com PO Box 1187 Renton WA 98057 11/4/2019 "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

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of Ecology not to move forward with a spray permit for imazamox on shellfish beds in Willapa Bay and Grays Harbor." Jan Meredith janessentials@peak.org 2575 McMillan St Eugene OR 97405 11/4/2019 "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." Fred Ingman ghostdancer109@comcast.net 3407 Goldberry Ln Eugene OR 97404 11/4/2019 "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

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Harbor." Pamela Yates yates890@comcast.net 890 NW 6th St Gresham OR 97030-6931 11/4/2019 "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." Jules Moritz mazda63@comcast.net 8285 NW Mitchell Dr Corvallis OR 97330-2824 11/4/2019 "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

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SW 11th Ave Tualatin OR 97062 11/4/2019 "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." Suzi Hokonson suzihonson@yahoo.com 1315 W Woodside Pl Null Spokane WA 99208 11/4/2019 "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 she llfish 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.

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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 h erbicide 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." Sheila McDonnal sjmcdonnal@gmail.com 1221 Minor Ave Apt 708 Seattle WA 98101 11/4/2019 "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

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