

January 13, 2025

Shawn Ultican
WA Department of Ecology
PO Box 47696
Olympia, WA 98504-7696
Submitted via comment portal



Dear Mr. Ultican,

The Pacific Coast Shellfish Growers Association (PCSGA) appreciates the opportunity to comment on the consideration to reissue the *Zostera japonica* (*Z. japonica*) Management on Commercial Clam Beds in Willapa Bay National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit. PCSGA was founded nearly a century ago to represent the interests of shellfish growers in the states of Washington, Alaska, Oregon, California, and Hawaii. PCSGA works on behalf of its members on a broad spectrum of issues, including environmental protection, shellfish safety, regulations, and technology. Our Washington members grow a wide variety of healthy, sustainable shellfish including oysters, clams, mussels, and geoduck.

Washington State has a rich history of farming shellfish which is critical to coastal counties, such as Pacific County as it provides much needed family-wage jobs and local tax revenue. There are many challenges to farming shellfish, including water quality, conflicting uses, and the growing presence of noxious weeds, including *Z. japonica* which was listed as a class C noxious weed by the WA State Noxious Weed Control Board in 2012. The presence of *Z. japonica* is known to cause significant impacts to benthic invertebrates, impact water and sediment temperatures. It also alters natural tide flats reducing shore bird feeding opportunities and alters natural setting and recruitment of clam seed.

Imazamox, a low-toxicity herbicide with the trade name Clearcast, has proved to be a crucial tool in controlling the spread of *Z. japonica*. Since its approval for use in 2014 it has allowed shellfish farmers to reclaim lands for clam production. Use of Imazamox has not resulted in adverse impacts to native species, including native eelgrass *Zostera marina* through several permit restrictions such as a limited treatment window, wind restrictions during applications, requirement for treatments at low tide and 10-meter buffers to

eliminate non-target impacts. The successful implementation of the general permit for Imazamox has reduced the acreage lands receiving treatment to an average of 82 acres per year and currently only nine farms possess a general NPDES permit to treat *Z. japonica*.

PCSGA supports and strongly encourages the renewal of the General Permit for *Z. japonica* Management on Commercial Clam Beds in Willapa Bay. In absence of a permit to use Imazamox, all the progress that has been made containing a class C noxious weed over the past decade will be reversed, putting the economic and environmental health of Willapa Bay and Pacific County in jeopardy. Thank you for considering these comments. Please don't hesitate to contact me if you need additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. A. Pilaro".

Margaret A. Pilaro
Executive Director