

From: hwbranch@aol.com
To: [Lubliner, Nathan \(ECY\)](#)
Subject: japanese eelgrass
Date: Friday, January 03, 2014 10:12:47 AM

Nathan Lubliner
Washington State Department of Ecology
PO Box 47696
Olympia WA 98504

Re: Permit for *Zostera japonica* management

Dear Nathan Lubliner:

If the Department of Ecology is concerned about invasive, non-native species, how about the Pacific oyster (*Grassostrea gigas*)? These oysters are not native and do not tolerate changes in pH as well as the native Olympia oyster (*Ostrea conchaphila*). The Pacific Coast of North America is characterized by natural changes in pH due to upwellings. Species that have evolved here are better suited to live here.

As I understand it, Imazamos will be used to kill eelgrass and Imidiclopid will be used to kill ghost shrimp in the benthos.

Once upon a time these intertidal areas were characterized by a disturbance driven progression of species. Simply put, ghost shrimp and tide flats are first to settle after a disturbance followed by eelgrass which dominates in some environments until the next disturbance and so on. Disbursed throughout this active ecosystem Olympia oysters grew on reefs.

The benefit of Pacific over Olympia oysters is that they can be grown on a large scale, employing machines and chemicals that increase profit. In the process of pursuing greater profit we have obliterated the natural disturbance driven cycle of tide flats, eelgrass and native oyster reefs. Now we are proposing to maintain this false environment, chemically.

The Department of Ecology's mandate is weak on protecting ecosystems and strong on moving Washington forward in the global economy. Given that shellfish aquaculture is looking less sustainable as practiced, due to chemical and biological toxins, ocean acidification and other factors, perhaps the State will see fit to recognize that we would be better protected, economically, by protecting and enhancing natural ecosystems.

Sincerely,

Harry Branch
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