

**From:** [epre@aol.com](mailto:epre@aol.com)  
**To:** [Lubliner, Nathan \(ECY\)](#)  
**Subject:** Imazamox Permits, legal no. 052-15 comments  
**Date:** Saturday, April 11, 2015 9:46:52 AM  
**Attachments:** [Willapa Bay Imazamox comments.doc](#)

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Hello Nathan,

I understand you are the contact person for comments with the proposed spraying of Imazamox in Willapa Bay. Would you add my attached comments.

Could you also tell me if this comment will be published on the web and if so will my name be included? If so, is it possible to have my name removed or listed simply as " Willapa Bay Landowner"

Thank you

Erik Prestegaard

Imazamox Permits, legal no. 052-15

Please consider this as additional comments and concerns with the proposed Imazamox permit for Willapa bay under legal no. 052-15.

I am a Willapa Bay waterfront landowner located in the area where the Imazamox spraying is proposed and have strong concerns that a full review on the spraying effects has not been made. I am questioning why it is necessary to apply such an extensive spraying as proposed and what the cumulative effects will have on the entire Bay.

Willapa Bay is known as one of the cleanest estuaries in the country and has successfully coexisted with both local industry and the extensive fish and wildlife. The Bay's shallow water supports the beds of eelgrass and shellfish, providing habitat for both fish and wildlife. The local habitat is a critical area for the substantial numbers of migratory birds, including the Pacific Brant, Northern Pintail, American widgeon, and mallard.

Research has documented that the flow of waters within the Bay are not consistent throughout and a number of very low-flow areas exist. My concern is the spraying of Imazamox may lead to a much higher concentration of the chemical in those areas. One of these areas is located directly in front of my property. I have not seen the clear documentation showing what these high and prolonged levels of Imazamox would have on the fish and wildlife in Willapa Bay.

Research has also documented and questioned the magnitude of the concern of the effect that the non-native *Zostera japonica* may be having on the native *Z. marina* (M. Hannam, The Influence of Multiple Scales of Environmental Context on the Distribution and Interaction of an Invasive Seagrass and its Native Congener 2013). This directly raises the question of why it is necessary for such an extensive toxic spraying to entirely eradicate a plant that may not be causing harm to all areas of the Bay. The further concern is the extensive spraying will be doing harm by reducing existing native *Zostera marina* eelgrass and eelgrass habitat for the migrating wildlife, and the unknown effects on salmon subjected to high concentrations in the low-flow areas of the Bay.

I also strongly object to the broadcast spraying of the chemical Imidacloprid. This toxic has repeatedly been linked to harming bees and attributing to the devastating problem of Colony Collapse Disorder. (Iu 2012, Krupke 2012) As with Imazamox, the broadcast use of a toxic chemical over this pristine Bay is directly in contrast to what our State Department of Ecology should be advocating.

I am requesting any spraying be substantially limited within the areas proposed until the full effects of Imazamox and Imidacloprid is determined and a useful monitoring plan is implemented. I am further requesting no spraying in specific areas of the Bay including those subject to low-flow influences, the Willapa National Wildlife Refuge, the Nemah Flats, Public Oyster Reserves WDFW DNR land, the North River estuary, and other areas critical for salmon habitat and the migrating wildlife.

Thank you  
Erik Prestegaard