Ivy, Holly, Herbicide, and Orcas

I once applied for a Port of Seattle contract to remove invasive plants in 5 acres of Port natural areas, and was dismayed at the 400-page construction-culture contract, and the unprofessionalism of the Port personnel.

The engineer's estimate for 5 acres of restoration was \$600,000 to \$1.2 million. In comparison, Seattle Parks' contractors can restore well over 100 acres for \$600,000.

At the Port's cost and rate, any progress will be overwhelmed by the re-infestation rate of invasive seed sources, and will fall far short of environmental goals.

As one, English holly is increasing exponentially, doubling every six years and having "the potential to become a dominant species in both number of individuals and area covered within a few decades... (transforming) the region's native forests on a large scale." (Dr. David Stokes, UW Bothell).

Improving restoration efficiency poses some hard choices, requiring ecological reasoning to weigh "best practice" tradeoffs that employ judicious herbicide applications.

Using herbicide on invasive plants helps retain organic matter and soil structure – the sponge and filter for stormwater runoff – the #1 polluter of Puget Sound. Stormwater runoff contains deposits of air and smelter pollution, plus runoff tainted by animal feces, lawn chemicals, and vehicle leaks.

Given the magnitude of the problem and the rate of invasive spread, we need to carefully consider whether organic control creates stormwater toxins worse than the herbicides. Getting this wrong will affect salmon, orcas, and human who eat salmon.

There are wetland-safe, groundwater safe herbicides that are considered "practically non-toxic" by the EPA, that are vetted by the Dept. of Ecology and by King County Noxious Weeds when used by a licensed professional.

In my opinion, judicious herbicide applications are the best environmental choice to minimize soil damage and stormwater runoff. Considering the toxicity of fuel for Port activities, concerns over herbicide seems misguided.

I encourage the Port of Seattle to reconsider its herbicide policy, and proceed according to best science. I also suggest a review of contracting protocols that encourage competition, efficiency, and job creation. AKIL

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