Mr. Rockett,

I am an oyster farmer in Grays Harbor WA and am very concerned about the uses of herbicides and pesticides in oyster farming. I have been in the oyster business my entire life and owned and managed one of the largest oyster farms and shucking houses on the West Coast. We grew and grow our oysters on the substrate, naturally. We work with nature to develop truly sustainable, proven farming techniques. My father and I cultivated oysters throughout the Puget sound, Hood Canal and Grays Harbor tidelands, confronting varying degrees of shrimp infestations along the way. Never did we require the use of herbicides or pesticides in our farming practices. The burrowing shrimp were a nuisance/challenge one expected as part of aquatic farming.

These shrimp challenges were not considered unusual or forbidding. Growers understood that they were just part of nature and could be controlled with traditional farming techniques.

These techniques are not unique or special in any way. Growers in every region understand the necessity of preparing the substrate/tidelands for the planting of crops, maintaining crops and preparing crops for harvest. We all used the process of harrowing. Harrowing is done on an outgoing tide to remove the sediments from the tidelands. The sediments came in mostly with the tide and are flushed out naturally with the tide. In the process of harrowing, some of the ghost shrimp are exposed and their natural predators, mainly fish, consume them. Through the harrowing process, balance could be restored or maintained, truly sustainability. No chemicals necessary.

Please stop–there is no reason to issue a permit for the chemical control of ghost shrimp.

Please instead question why some aquatic farmers would want to use chemicals such as imidacloprid to control the shrimp issues they are facing in their farming environment.

What changed?

Their farming techniques.

The farming practices utilized by some of the growers today are not sustainable. Miles of nylon rope on plastic poles impede incoming currents are the current trend. This is called long line oyster farming. These long lines impede the natural currents in an estuary and promote the accumulations of sediment. These sediments accumulate at much faster rates than are natural to the area. This accumulation of sediment creates the perfect environment for burrowing shrimp. No longer can nature flush out these tidelands. Growers can no longer use harrows to flush out the tidal environment and rid the area working with nature of ghost shrimp.

There is habitat loss happening at a rapid rate throughout our state and especially in our aquatic environment. The Orca Whales are threatened along with so many other species. Instead of issuing spray permits, why not enforce the Clean Water Act, protect public health and the environment? Why not work on restoration of our aquatic areas? If growers understand that the option for using chemicals is no longer available, the growers will change their farming techniques. Chemicals are a cheap alternative to tried and true farming practices and long-term are not sustainable or good for any one.

I have invited you before and I welcome you again to come visit our farm. We invite you to see and experience firsthand the health of the tidelands, the natural aquatic diversity and see the results of our sustainable farming practices. DNR once classified our tide lands as shrimp infested and prior to our farm/DNR lease, issued permits to shrimpers to harvest shrimp from tidelands in this area. These tidelands are now cultivated. We brought the tidelands back into balance by working with nature, not against it, and most importantly without ANY use of herbicides or pesticides. We can demonstrate that chemicals are not a necessity in oyster farming. States such as California and Oregon do not allow the use of chemicals and there are many very profitable farms in those areas. There are options. The industry knows it.

I sincerely hope you accept our offer to visit our farm.

Thank you for your consideration.

Erika Buck

FMO AquaCulture