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Remarks regarding the Willapa Grays Harbor Oyster Growers Association (WGHOGA) application for a water quality pollution discharge (NPDES) permit and sediment impact zone authorizations.

The pesticide Imidacloprid is a tool that has been proposed, as part of an integrated pest management program, to effectively and safely treat the burrowing shrimp problem in Willapa Bay. The shrimp turn over the bay bottom creating a wasteland where productive oyster beds were previously. No attempt is contemplated to eradicate the native burrowing shrimp, but only to control their proliferation.

Historically, burrowing shrimp populations were kept in check naturally by several factors.

The seasonal Spring freshets of the Columbia River historically created a fresh water plume offshore that would tidally enter the Bay, seasonally controlling burrowing shrimp naturally, as the shrimp are not fresh water tolerant. This seasonal fresh water flushing has been eliminated by the dams on the Columbia. At least for the foreseeable future, total removal of the dams seems unlikely, due to the large scale electrical generation and irrigation benefits that the region realizes from the dam's existence.

Native fish stocks in the rivers and streams draining into Willapa Bay would also seasonally flood the Bay with young fish, which would arrive in time to feed on burrowing shrimp larva. Unfortunately, due to compromised habitat, historical blockage of fish-bearing tributaries, and State Fisheries policies that seem determined to manage our native fish stocks at the edge of extinction rather than for more historical abundance, this once significant predation on the burrowing shrimp has been greatly reduced in effectiveness.

Sturgeon in the Bay have been all but extirpated by historical over-fishing. These slow-reproducing native fish once fed directly on burrowing shrimp, helping to control their numbers.

While it may be possible to mitigate for or restore some of these natural controls on burrowing shrimp, given time, money and political will, none of these factors can be restored in a near-term time-frame. In the meantime, the Oyster industry has been soldiering along in Willapa Bay and Grays Harbor.

One tool the oyster growers had to accomplish this was the use of Carbaryl, a pesticide that controlled the burrowing shrimp. This was used for 60-years as an effective control, with no significant problems or demonstrated side-effects. That tool was taken away in an arguably arbitrary manner.

Policies regarding regulating these control activities should be based on real science, not arbitrary opinion. The science in this case is quite clear, demonstrating that Imidacloprid can be used safely and effectively as part of an integrated pest management program.

The oyster farmers of Willapa and Grays Harbor are true stewards of their beds, as zealous as any farmer is of the land that is not only their own source of income, but a legacy that has been passed down through several generations. They are not about to compromise the safety of their product, or their lands.

I wish to go on the record as supporting the WGHOGA application for a NPDES permit and sediment impact zone authorizations for use of Imidacloprid as part of an integrated pest management program.

Frank Wolfe
Pacific County Commissioner (District 2)