

Frank Wolfe: Let's see how this works. Can everyone hear me? As far as we know it's being recorded?

Fran Sant: Yes. You're being recorded on 2 recordings and on tv.

Frank Wolfe: My name is Frank Wolfe. I live in Pacific County in the area called Nacada – part of the unincorporated part of Pacific County. The pesticide Imidacloprid is a tool that has been proposed -- as part of the 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 its proliferation. Historically, burrowing shrimp populations were kept in check naturally by several factors. The seasonal spring [unintelligible] of the Columbia River historically created a freshwater plume offshore that when tidally entered the bay, seasonally controlling the burrowing shrimp naturally – as the shrimp are not particularly [unintelligible]. This seasonal freshwater flushing has been eliminated by the dams on the Columbia. At least for the foreseeable future, total removal of the dams seems unlikely to the large scale electrical generation and irrigation benefits the brunt of 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 pee on the burrowing shrimp larvae. 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 one significant predation on the burrowing shrimp has been greatly reduced in effectiveness. Sturgeon in the bay have been all but extirpated in historical over-fishing. These slow-reproducing native fish once spread directly on burrowing shrimp [unintelligible] 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. The tool the oyster growers had – 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 controlled activities should be based on real science, not on arbitrary opinion. The science in this case is quite clear – demonstrating that Imidacloprid can be used safely and effectively as part of an integrative pest management program. The oyster farmers of Willapa Bay and Grays Harbor are true stewards of their beds – as zealous as any farmer is to the land that is not only their only 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 record of supporting the Willapa Bay Grays Harbor Oyster Growers Association Application for an MPDS permit and sediment impact zone

authorization for use of Imidacloprid as part of an integrated pest management program. Frank Wolfe. Thank you.