

## Tom Jensen

I urge Ecology to deny a permit for applying Imidacloprid to control burrowing shrimp. My sense is that this neonicotinoid chemical has too many unknowns to risk long term impact on the environment of Willapa Bay.

As with beekeeping and serious decline in those pollinators, which probably came from a combination of issues (long-distance transport for pollination (exposing bees to new challenges faster than they can evolve defenses), fungi, mites, and more recently neonicotinoids), I worry that Imidacloprid could be one of a combination of issues causing problems in unanticipated ways with other species.

I also question the abandoning of helicopter as a proposed application method to the tidal areas. Doesn't the proposed use of boats mean application would be when areas are flooded and prone to unintended dispersal when the tide goes out? (This might be akin to cropdusting drift when it's too windy.)

The use of Imidacloprid would also seem to prevent the chance for marketing organic oysters?

Here's a nearby example: <http://www.organicoysters.ca/meettheguys.html>

Thank you for the opportunity to comment.