

Ava Driscoll

(Email Submission)

Attn: Derek Rockett, Permit Writer

I am writing to comment on the Environmental Impact Statement for Control of Burrowing Shrimp using Imadacloprid on Commercial Oyster and Clam beds on Willapa Bay and Grays Harbor, Washington, Draft. I oppose any Permit to use Imadacloprid on the mudflats for the following reasons.

Cons:

- 1) Lack of information regarding the effect of Imadacloprid on the environment.
- 2) Lack of Integrated Pest Management (IPM).
- 3) Sturgeon and crab will be adversely affected if exposed to Imadacloprid.
- 4) Imadacloprid may be a skin irritant
- 5) The tide flow will disperse Imadacloprid to a greater area than intended.
- 6) Imadacloprid was not intended to be used in water.
- 7) Shrimp will develop an immunity to Imadacloprid the more it is used.
- 8) There may be other harmful chemicals included in the Imadacloprid solution.
- 9) Biological diversity will decline. I may not see the small orange sea slug with black spots on the oyster beds any more. I also enjoy seeing hermit crab, eel, sponges, cockles, and other creatures.

Predators and hazards besides shrimp that kill oysters:

- 1) Starfish have died off suddenly and mysteriously.
- 2) Oyster drills (*Ceratostoma inornatum*)
- 3) Green crab
- 4) Runoff from clear cutting, fertilizing, and pesticides

Manual Methods:

- 1) Breaking and scattering oysters to keep them from sinking in the mud
- 2) Other methods of growing oysters, such as rafts or bags may be used.
- 3) Beneficial birds and fish may be used in controlling the shrimp. I have seen photos of Western Grebe eating shrimp.
- 4) Other crops or uses may be considered -- scallops, abalone, sea weed (if legal), mussels. Shell can be used to make other products.

I strongly oppose any permit for the application of pesticides, such as Imadacloprid, in Willapa Bay.

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