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The Willapa/Grays Harbor Oyster Growers Association (WGHOGA), which grows non-native oysters on the Washington Coast, proposes to control native burrowing shrimp through the application of Imidacloprid.

Imidacloprid has been found to enhance adipogenesis, resulting in insulin resistance in cell culture models (Sun et al. 2016, 2017). This provides a strong concern for human health. More direct impacts from insecticide application, including the application of Imidacloprid, have been observed in marine invertebrates which are a critical food source for juvenile salmon and forage fish (Westin et al. 2014, 2015). Wild fish species of salmon and the forage fish food structure that they depend upon are critical components of coastal resiliency- culturally, economically, and ecologically. Macneale et al. 2014 and Gibbons et al. 2015 provide thorough reviews of these concerns.

Application of Imidacloprid to coastal areas in the shallow areas of Grays Harbor and Willapa Bay will detrimentally impact critical marine and nearshore ecosystems while also being a human health concern. Impacts to coastal juvenile salmon and forage fish when they are feeding, resting and migrating will have negative impacts to both local salmon populations as well as to salmon populations currently listed under the Endangered Species Act that utilize Washington's coastal waters for nourishment and refugia during their migrations (Shaffer et al. 2012). Additionally, application of Imidacloprid will have a cascading impact up the food chain- impacting marine mammals that include populations also listed under the Endangered Species Act.

Washington's coastal ecosystems are complex and vital to our region. We should be working to restore and protect them, not further their demise to enhance the growth of a non-native shellfish species for commercial use. The state and federal agencies are required by law, to preserve Washington State's wild species and the ecosystems upon which they depend. Application of Imidacloprid and other insecticides in coastal zones contradict this mandate and should not be permitted.