

# Walter Jorgensen

Dear DOE,

Commercial shellfish beds, specif. gooeyduck, have obliterated Totten Inlet in lower Puget Sound. In addition to pre-empting the beach from any other reasonable year-round recreational or natural appreciation use, mussel barges cover a good portion of the "non-open" waters. Leave nature alone and protect it from the greed of "about a dozen oyster farmers from the Willapa Grays Harbor Oyster Growers Association (WGHOGA)." These tide lands should be held in trust for the public, with easements if necessary, and not mis-treated with pesticides to support private their aquaculture practices.

DOE should DENY the permit to apply the pesticide Imidacloprid IN ANY Amount to control burrowing shrimp on commercial shellfish beds in Willapa Bay and Grays Harbor.

Here are the three major reasons:

1. Imidacloprid is a neonicotinoid pesticide. It has deadly consequences for beneficial insects, including bees. Bees are already critically threatened from so-called colony collapse disorder. Colony collapse is thought to have more than one contributor, but among the most serious, and the most preventable, is from the use of neonicotinoids. The use of Imidacloprid is not safe to use at any strength.
2. There likely could be adverse consequences from using it in this situation which are not understood at this time that may only come to light after it is too late.
3. The Department of Ecology's mission is "protect, preserve, and enhance Washington's environment". No where in this mission statement does it say or even suggest that business interests should take priority above protecting the environment. I will presume that the reason business interests are not mentioned is that protecting our environment is more important than protecting business interests. I hope that is still the position of DOE.

Please do not permit the use of this neonicotinoid pesticide on our fragile coastal waters just to benefit a few businesses.