Christine Hoepfner

(Email Submission)

Spraying Willapa Bay and Grays Harbor with any quantity of imidacloprid is not a sound approach, as the "knowledge gaps" mentioned in the SEIS indicate. The best alternative the SEIS offers is "No Action;" however what is really needed is to restore the bays' basic ecology.

A useful guide in addressing these kinds of situations is "first, do no harm." To be in accord with this aim, as the SEIS' reference to "knowledge gaps" makes clear, more needs to be known about the toxic effects of spraying imidacloprid before it might realistically be considered as an option. Monitoring may provide this information--but too late to undo any damage that was not anticipated.

There is far too much that isn't known about the negative effects of spraying imidacloprid. At the same time, there remain "knowledge gaps" about the efficacy of imidacloprid for achieving the intended results in situations like Willapa Bay and Grays Harbor.

Risking deep ecological damage without sufficient assurance of benefit does not make political, economic, or ecological sense. This leave the "No Action" alternative as the best of the three options proposed in the SEIS. Yet this alternative is not adequate to address the situation in Willapa Bay and Grays Harbor. In fact, the SEIS did not present the best option: the habitat needs to be restored, and protecting the streams flowing into the bays is the best way to begin to achieve the most desirable result.

Thank you for your consideration.

Sincerely,