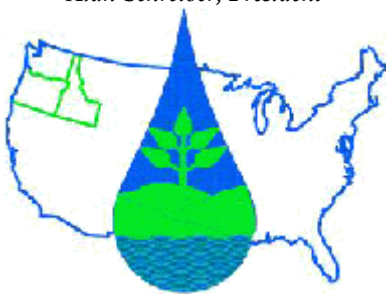
AGRICULTURE DEVELOPMENT GROUP, INC.
Independent agriculture research and information service
Alan Schreiber, President



To: Rich Doenges, Ecology Southwest Regional Office

From: Alan Schreiber, President of Agriculture Development Group, Inc.

Re: Tentative Denial of Imidacloprid Permit Application

The U.S. EPA has approved a Section 3 Federal registration for imidacloprid for two formulations, one flowable and one granular. Federal registration of pesticides is the providence of the U.S. government. The EPA has not been that favorable for allowing new registrations of pesticides, but based on their assessment of this use pattern they determined that use of imidacloprid did not pose an unreasonable risk to human health and the environment. The Agency was very familiar with the local situation and the use pattern. Agency representatives has been to Willapa Bay multiple times and were comfortable with the use pattern.

Imidacloprid has one of the most complete data packages of any pesticide registered with the EPA. EPA felt that use of imidacloprid was a reduced risk use pattern and was certainly more environmental desirable than use of carbaryl. The Agency was able to make a very informed decision on this use pattern and to date has indicated no level of concern with the use of

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imidacloprid for control of burrowing shrimp. If the agency with responsibility for the registration for this very specific use pattern and the state agency in Washington with responsibility for pesticide registrations has no issue with the use pattern the Department of Ecology should recognize the authority of these agencies and their expertise in these matters.

The Washington State University, University of Washington and the Washington State Commission on Pesticide Registration and the Washington legislature through use of proviso funds has conducted exhausting research on the use of carbaryl, imidacloprid, other pesticides both conventional and reduced risk products and compared them to a non chemical alternatives. WSU's Dr. Kim Patten was pivotal in conducting this research. Non chemical control alternatives simply did not work. Not a single one was effective. Organic or very low risk products did not provide suitable efficacy. The only product that provided an acceptable level of control while posing minimal risk to the environment was imidacloprid. This associated group of scientists conducted years and years of research on this topic.

The team of researchers involved with looking for alternatives did the most exhaustive search of all possible means of controlling burrowing shrimp. An example of the lengths they went to was to try and do environmental manipulations to attract sturgeons and whales in to Willapa Bay to feed on burrowing shrimp in some kind of awesome attempt at biological control. As someone who prides himself as knowing more about pest management research than anyone in Washington State, I can tell you that the oyster growers and the allied researchers have conducted the single most exhaustive search of ways to control burrowing shrimp than any grower or pest management use group in the history of the state of Washington. This group has tried every single possible means than anyone could think of to control this ultra-destructive pest.

As a former EPA and Washington State University scientist and the current Administrator of the Washington State Commission on Pesticide Registration, I have a unique perspective on this issue from the first discovery of the potential for imidacloprid to replace carbaryl to the current unfolding debacle of denying this permit.

I am not aware of any credible private or public agency that has a scientific capacity that can prove or say that imidacloprid poses an unreasonable risk to human health or the environment. If the WaDOE denies this permit not only will take an anti-science position, it will also take a position that is either in opposition to or not supported by the US EPA, Washington State Department of Agriculture, the science of Washington State University and University of Washington. It is also not supported by the U.S. Fish and Wildlife Service or NOAH Fisheries.

Further, everyone recognizes the environmental damage that is associated with uncontrolled burrowing shrimp populations. The lack of control of fossorial shrimp poses a well-known threat to the environment of Willapa Bay and Gray's Harbor. By not allowing use of imidacloprid, the WaDOE is supporting environmental destruction of estuarine habitat. DOE will make things worse not better by denying this permit.

The WaDOE needs to issue the permit that would allow the application of the imidacloprid.