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Imidacloprid draft SEIS

On behalf of the Washington Farm Bureau, we are providing comments on the Willapa-Grays Harbor Oyster Growers Association request for a permit to use the pesticide imidacloprid to control burrowing shrimp in Willapa Bay and Grays Harbor.

As a grassroots organization with over 46,000 members, Washington Farm Bureau works to protect the interests of farm families across the state. Today, our members face unprecedented regulatory pressures that threaten the viability of their operations and their capacity to produce good local food on working lands.

We understand that the current proposal is for the use of imidacloprid on only 490 acres in the two bays – substantially less than the 2,000 acres in the prior permit request. This represents a significant reduction and one that will greatly diminish any possible concerns that were expressed by a vocal minority last time. In addition, the growers have stated the control will be applied on the tidelands with hand or ground equipment and not by aerial sprayer. This is also a substantial change from the prior permit and shows the great lengths the growers are willing to commit to reduce any potential environmental impacts.

The one thing that has not changed is the need to control burrowing shrimp. Without this essential tool, the continued viability of the shellfish industry in the Willapa Valley is at risk.

Many of these beds have a history of requiring shrimp control to remain viable for cultivation. Without the use of imidacloprid, an effective and reliable tool, many valuable multi-generational family oyster farms in these two bays could be lost. Solid research demonstrates that shellfish beds become economically unviable once infested by significant populations of burrowing shrimp.

This region relies on the economic stability of the shellfish industry, which provides hundreds of jobs, and many more indirect employment opportunities. These rural communities will be greatly impacted economically if a prohibition of imidacloprid was imposed.

For these reasons, we encourage approval of the permit.

Thank you for the opportunity to comment on this important issue.