

**From:** [Pat Rasmussen](#)  
**To:** [Zentner, Greg \(ECY\)](#); [Rockett, Derek \(ECY\)](#)  
**Cc:** [patr patr](#)  
**Subject:** Comments regarding use of pesticides in Willapa Bay and Washington waters  
**Date:** Friday, January 03, 2014 11:41:01 AM

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RE:

Ecology is inviting people to comment on:

- the scope of an environmental impact statement (EIS) for the burrowing shrimp control proposal, and
- a draft permit and draft EIS for controlling non-native eelgrass in the Bay.

Dear Mr. Roberts,

I am opposed to the use of the pesticide imidacloprid to control burrowing shrimp that harm commercial oyster beds and the use of the herbicide imazamox to control non-native eelgrass on commercial clam beds.

Safety of shellfish for human consumption is already a major issue - an additional toxic burden for humans and marine life is not okay.

The shellfish industry had *Zostera japonica* (eelgrass) listed as a noxious weed in 2013 in all Washington waters, not just Willapa Bay/Grays Harbor. There is no adequate plan to prevent collateral damage to native eelgrass, the destruction of food for thousands of migratory waterfowl or the destruction of habitat for fish.

The proposed use of Imidacloprid, a neurotoxin, is banned in Europe and other states. There is not an adequate plan to prevent damage to other marine life or the devastating effect this toxin has on bees. Saving bees is our uppermost issue. Also, it is becoming clear that neurotoxins affect anything that has nerves - that includes humans. We must stop using them.

The spraying of pesticides for eel grass could extend to Puget Sound. We are cleaning up Puget Sound not increasing the toxic soup that harms sea life. Non-toxic control must be used instead. Or perhaps control is not a good idea if non-native eel grass provides the ecosystem service of native eel grass. A full analysis of the ecosystem services of non-native eel grass must be made.

Although the non-native eel grass may be a problem for moneymaking projects like commercial clam beds, it is likely serving the ecosystem services at this point of native eel grass. Young salmon depend on eel grass. Those salmon that are endangered and threatened and need protection themselves are also the food of endangered Southern resident orcas. During the spring, summer and fall of 2013 the Southern Resident orcas were absent most of the time from Puget Sound, for the first time, due to lack of food - salmon. They spent most of the time down the coast between Puget Sound and the Columbia River where salmon were available. Therefore they could be affected by use of pesticides in Willapa Bay. A full analysis of this must be done by NMFS. The Southern residents are also carrying too many pesticides already used in Puget Sound waters. We need to stop putting more pesticides into Puget Sound and the ocean. Many commercial ventures that desire the use of pesticides for their moneymaking ventures have resulted in the cumulative impacts of this toxic soup harming sea creatures. The time to stop doing this is now.

No more pesticide use in Washington waters.

Eel grass is necessary for young salmon. If the non-native variety is serving the ecosystem service that helps endangered and threatened salmon in Willapa Bay, then spraying it is not acceptable.

Commercial ventures need to find non-toxic solutions to their problems, especially when they are in public waters. Our need to have a clean ecosystem is more important than their need to make money.

Please keep me informed of these proposed projects into the future.

Thank you.

Pat Rasmussen

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Pat Rasmussen  
World Temperate Rainforest Network  
PO Box 13273  
Olympia, WA 98508  
509-669-1549  
[www.temperaterainforests.org](http://www.temperaterainforests.org)