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**To:** [Rockett, Derek \(ECY\)](#)  
**Subject:** imidacloprid  
**Date:** Thursday, November 27, 2014 8:03:15 AM  
**Attachments:** [imidacloprid\\_comments.docx](#)

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Mr. Rocket

Please add the CRCFA comments to the public record on **imidacloprid**.

Thank you,

Dale Beasley, President Columbia River Crab Fisherman's Association



# Columbia River Crab Fisherman's Association

P.O. Box 461 Ilwaco, WA 98624 – 360-642-3942

...Serving the needs of the coastal crab fishing industry and coastal fishing communities...

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11/27/2014

Attn: Derek Rocket

RE: CRCFA support for Ghost Shrimp Control by imidacloprid

The Columbia River Crab Fisherman's Association has had a long term relationship with the oyster. Oyster shell plots have long been used for required mitigation for other harmful activities that impact the crab resource like channel dredging and disposal which can be fatal to large numbers of harvestable crab.

Shell plot construction is expensive for the USACE. When burrowing shrimp are active in an area the shell sink into the mud newly churned by burrowing shrimp destroying the effectiveness of mitigation project. In addition these mitigation shell plots provide a place for natural set of oysters to occur and an oyster reef can form if the shell stays on the surface long enough further benefitting the marine environment.

Oyster farming provides similar cover for YOY crab to grow and gain size avoiding many predators at their critical and most vulnerable life stage and eventually contributing to the greater economy 3 or 4 years down the road.

Oysters are also a major contributor to improving overall water quality by filtering over abundant nutrients out of the water column that can if severe enough cause anoxic conditions. Recent NOAA investigations on marine water has shown that these conditions are especially of concern at many nearshore locations and water quality improvement gains from oyster farming is an overall plus for the marine ecology which would not be available if the oysters sink into the mud and die as a result of burrowing shrimp which MUST to be controlled.

In this particular case any ill effects of imidacloprid that may be pointed out in this public comment period will undoubtedly fall far short of the benefits that will be gained by a healthy oyster farm, not only to the oyster farmer, but the crab fishermen, the greater community, but also the overall environment as well.

The crab fishermen urge Ecology to expedite imidacloprid approval.

Thank you for seriously considering our concerns,

Dale Beasley, President CRCFA