

From: [Chris Betcher](#)
To: [Rockett, Derek \(ECY\)](#)
Subject: Willapa-Grays Harbor pesticide SIZ
Date: Monday, December 08, 2014 4:36:52 PM
Attachments: [image001.jpg](#)
[Willapa Bay pesticide letter.pdf](#)

Mr. Rockett

Please see attached .pdf letter regarding the Public Notice for a Proposed Sediment Impact Zone Application, National Pollution Discharge Elimination System Permit for application of *Imidacloprid* to Willapa Bay and Grays Harbor.

Respectfully,
Chris Betcher



Jen-Jay Inc.
P.O. Box 278
Deer Harbor, WA 98243
(360) 376-4664
jenjay@rockisland.com
www.jenjainc.com

IMPORTANT NOTICE: This message (including any attachments) may be privileged and/or confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this e-mail in error please notify the sender by return e-mail and delete this message from your system. Any unauthorized use or dissemination of this message or the attachments in whole or in part is strictly prohibited.



JEN-JAY, INC.

8 December 2014

Derek Rockett, Permit Manager
Washington Department of Ecology
SWRO, Water Quality Program
P.O. Box 47775
Olympia, WA 98504-7775
Derek.Rockett@ecy.wa.gov

Re: Public Notice for a Proposed Sediment Impact Zone Application, National Pollution Discharge Elimination System Permit, Willapa Bay – Grays Harbor

Mr. Rockett

As a marine biologist with land and tideland interests on Willapa Bay I am writing to oppose permitting the use of *imidacloprid* pesticide in the intertidal areas of Willapa Bay to control the burrowing shrimp. The burrowing shrimp is a native species. Pesticide control of the burrowing shrimp with the use of *carbaryl* has altered the ecosystem with possible negative impacts (increased *Zostera japonica*). To control *Z. japonica* another pesticide (*glyphosphate*) was put into use. This cascade of events shows a need to find other methods of mitigating for the detrimental effects of the native burrowing shrimp on the aquaculture of the non-native oysters and clams. Maintaining the natural balance of all native species is perhaps the best way to maintain the overall health of Willapa Bay.

Another concern with this permit request is the use of aerial application of the pesticide especially during the spring and summer months. *Imidacloprid* has been implicated in colony collapse disorder in bees. Aerial application, even during light winds, can affect unintentional locations.

I am not opposed to aquaculture in Willapa Bay. I have a vested interest in maintaining a healthy aquaculture system. Concerted efforts need to be made in developing a way to keep the oysters and clams on the surface and not sinking into the soft sediments. In my opinion physical, not chemical, solutions to the problem need to be investigated.

Chris Betcher
Jen-Jay, Inc.

P.O. Box 278, Deer Harbor, WA 98243-0278
Ph: (360) 376-4664 Fax: (360) 376-6446 Boat: (360) 317-5373 Email: jenjay@rockisland.com