

From: [Culver, Michele K \(DFW\)](#)
To: [Rockett, Derek \(ECY\)](#)
Subject: WDFW Comments on Draft Individual Permit for Burrowing Shrimp
Date: Monday, December 08, 2014 2:48:48 PM
Attachments: [WDFW Comments on Imidacloprid Permit.pdf](#)
Importance: High

Dear Mr. Rockett,

Attached are the Washington Department of Fish and Wildlife's comments on the draft individual permit for burrowing shrimp management on commercial oyster and clam beds in Willapa Bay and Grays Harbor.

I would appreciate a confirmation of your receipt of these comments. Thank you.

Sincerely,

Michele K. Culver, Regional Director
Washington Dept of Fish & Wildlife
48 Devonshire Road
Montesano, WA 98563
360-249-1211



State of Washington
Department of Fish and Wildlife

Mailing Address: 48 Devonshire Rd, Montesano, WA 98563, (360) 249-4628, TTY (800) 833-6388
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA 98501

December 8, 2014

Mr. Derek Rockett
Department of Ecology
Post Office Box 47775
Olympia, Washington 98504-7775

RE: Draft Individual Permit for Burrowing Shrimp Management on Commercial Oyster and Clam Beds in Willapa Bay and Grays Harbor

The Washington Department of Fish and Wildlife (WDFW) would like to offer the following comments on the proposed issuance of a new individual permit to regulate the use of imidacloprid on commercial oyster and clam beds in Willapa Bay and Grays Harbor, and the potential request to revise the time period during which imidacloprid may be applied.

In general, WDFW supports seeking alternative methods to carbaryl spraying to control burrowing shrimp on commercial shellfish beds in Willapa Bay and Grays Harbor. In 2001, WDFW signed a Memorandum of Agreement (MOA) among the Washington Departments of Ecology and Agriculture, Willapa/Grays Harbor Oyster Growers' Association (WGHOGA), Pacific Coast Shellfish Growers' Association, and the Pacific Shellfish Institute. The purpose of the MOA was to establish a process and timeframe for the development of a sustainable, site-specific, environmentally sound and ecologically based integrated pest management plan (IPM) for the control of burrowing shrimp. This agreement moved the growers away from using carbaryl for burrowing shrimp control and towards alternate control methods that could be more species-specific, economical, reliable and environmentally responsible. In accordance with the MOA, WDFW has provided substantive and timely responses and resources, as available and appropriate, in support of the Growers' Associations' efforts to develop and implement an IPM plan for burrowing shrimp control, which we continue to support.

Over the years, WDFW has closely followed the work conducted by the shellfish growers as they searched for alternate methods of control. In addition, WDFW has funded some of research on imidacloprid using funds from the WDFW Oyster Reserve Research account, in accordance with RCW 77.60.160. However, while this research may be useful, it still leaves many unanswered questions with regard to imidacloprid and its potential effects on other organisms.

WDFW has concerns about the potential effects of imidacloprid associated with secondary exposures, trophic impacts, and bioaccumulation effects—all of which are not well-studied. From studies that have been conducted, we do know that imidacloprid is toxic to insects and birds, and while the concentration being applied in Willapa Bay and Grays Harbor is relatively low, it appears that cumulative effects on the environment are pretty much unknown.

We also have concerns about the potential effects of imidacloprid on Dungeness crab and finfish. While we understand that the proposed treatment levels likely would not have a population impact on Dungeness crab, it is our understanding that imidacloprid has been known to affect larval crab; therefore, it may have trophic and bioaccumulation impacts to shorebirds and juvenile fishes that may find larval crabs to be easy prey.

The effects of imidacloprid on finfish are also unknown. WDFW would be supportive of additional research to learn more about its effects on finfish, and we would certainly need this information before we could consider adjustments to the timing of the application window earlier than April 15th as salmon are present at that time.

Finally, while the proposed application of imidacloprid may be focused on the tideflats, we don't know to what extent it may drift when applied aerially or seep into the groundwater. We were pleased to hear from one grower in Willapa Bay about the success he had when applying imidacloprid in its granular form. To the extent that imidacloprid is approved for use by the Department of Ecology, we would strongly encourage focusing usage of the granular product over aerial spraying. While the application of this product type may be more time-consuming and labor intensive, it would also help ensure that the product was more strategically applied. We look forward to learning more about how successful the granular application was in terms of its effectiveness on shrimp burrows and how that compares with the efficacy of the aerial spraying efforts, which seemed to have mixed reviews.

In summary, WDFW is not opposed to the issuance of the National Pollution Discharge Elimination System (NPDES) permit to the WGHOGA to allow the use of imidacloprid to control burrowing shrimp populations in Grays Harbor and Willapa Bay under the conditions outlined in the draft NPDES permit; however, we did want to note our concerns associated with its potential effect on other fish and wildlife organisms for the record.

Thank you for the opportunity to review and offer comments on the WGHOGA application for the use of imidacloprid to control burrowing shrimp. Grays Harbor and Willapa Bay are important, valuable, estuaries locally, regionally, and nationally—as such, resource management agencies need to be prudent and responsible in our efforts to protect these areas for the benefit of present and future generations.

If you have questions regarding our comments, please feel free to contact me at (360) 249-1211 or Michele.Culver@dfw.wa.gov.

Sincerely,



Michele K. Culver
Regional Director