

From: [John Stuhlmiller](#)
To: [Rockett, Derek \(ECY\)](#)
Subject: Draft Individual Permit for the Control of Burrowing Shrimp using Imidacloprid on Commercial Shellfish Beds in Willapa Bay and Grays Harbor
Date: Wednesday, December 03, 2014 6:34:43 PM
Attachments: [C6D5EC62-928B-4070-8A38-459CC91800F6.png](#)
[WFB Comments Supporting Expedited Shellfish Permit for Burrowing Shrimp Control.pdf](#)

Attached please find WFB comments on the Burrowing Shrimp/Imidacloprid permit.

Please feel free to contact me if you have any questions.

Sincerely,

John Stuhlmiller
Chief Executive Officer



Cell: 360.870.6017

Office: 360.528.2903

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975 Carpenter Rd NE, Suite 301, Lacey, WA 98516

December 4, 2014

Derek Rocket
Department of Ecology
PO Box 47775
Olympia, WA 98504-7775

Dear Mr. Rocket,

On behalf of Washington Farm Bureau we are providing comments on the Willapa-Grays Harbor Oyster Grower Assn request for a permit to control burrowing shrimp.

As a grassroots organization with over 42,000 member families, 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 draft permit proposes to prohibit imidacloprid treatment in the South Willapa Bay area, which includes over 6,000 acres of productive commercial shellfish beds. This is unacceptable. The continued viability of the shellfish industry in the Willapa Valley depends on your best efforts to keep them open for treatment, unless there are verifiable and documented reasons to close specific areas. Please do all you can to expedite the necessary imidacloprid permitting and ensure that any permit conditions and costs are reasonable and scientifically based.

Many of these beds have a history of requiring shrimp control to remain viable for cultivation. By eliminating an effective and reliable tool, Ecology would essentially be eliminating many valuable family oyster farms in Willapa Bay. 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. The rural economic impact of such a prohibition would be immense. For these reasons, we encourage expedited issuance of a permit.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'John Stuhlmiller', written in a cursive style.

John Stuhlmiller
Chief Executive Officer