

From: wilson99aps@aol.com
To: [Rockett, Derek \(ECY\)](#)
Subject: Imidacloprid-Burrowing Shrimp EIS
Date: Saturday, February 15, 2014 11:45:14 AM
Attachments: [Ecology, Burrowing Shrimp, EIS 2.15.14.pdf](#)

Attached is a comment letter regarding proposed use of Imidacloprid on Commercial Shellfish Beds in Willapa Bay and Grays Harbor, Determination of Significance and EIS Scope.

Sincerely,

Vicki and Steve Wilson
Arcadia Point Seafood
240 SE Arcadia Point Road
Shelton, WA 98584

Geoduck Clams

ARCADIA POINT SEAFOOD

O n T o t t e n I n l e t, P u g e t S o u n d

February 15, 2014

Mr. Derek Rockett, Permit Writer
Department of Ecology, Southwest Regional Office
PO Box 47775
Olympia, WA 98504-7775

Re: Proposed use of Imidacloprid on Commercial Shellfish Beds in Willapa Bay and Grays Harbor,
Determination of Significance and EIS Scope

Submitted by e-mail – Derek.rockett@ecy.wa.gov

Dear Mr. Rockett,

Please accept the following comments as you design the scope of the Environmental Impact Statement (EIS) for the use of Imidacloprid on Commercial Shellfish Beds in Willapa Bay and Grays Harbor.

Our family operates a small shellfish company in South Puget Sound. Although burrowing shrimp are not as large a problem on our farms as they are in the Willapa Bay and Grays Harbor areas, we have seen first hand the negative environmental and economic impact they have on productive shellfish beds (whether commercial, recreational, or tribal).

We strongly support the comments submitted by the Pacific Coast Shellfish Growers Association (PCSGA), dated February 13, 2014. We understand that the EIS will assess probable adverse environmental impacts of the proposed action (use of imidacloprid). We hope analysis of the converse is given equal attention, i.e., analysis of significant environmental impacts of not controlling burrowing shrimp. Although the focus of the EIS is environmental impacts, the scoping general requirements also allow discussion of other impacts. We strongly support discussion of the social and economic impacts of loss of productive shellfish beds resulting from lack of control of burrowing shrimp.

Thank you for all the work that the Department is devoting to this issue. We look forward to a robust assessment of impacts and alternatives that is based on best available science.

Sincerely,



Vicki and Steve Wilson

Steve & Vicki Wilson
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Shelton, WA 98584

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