

**From:** [Ross Barkhurst](#)  
**To:** [Rockett, Derek \(ECY\)](#)  
**Subject:** FW: Comments on imidaclopridd scoping document  
**Date:** Wednesday, February 12, 2014 11:53:45 AM

---

spelled address wrong and this did not go through. trying again.

---

From: rp.barkhurst@hotmail.com  
To: derek.rocket@ecy.wa.gov  
Subject: Comments on imidaclopridd scoping document  
Date: Mon, 10 Feb 2014 21:55:05 -0500

In today's situation we have little cause for confidence that Ecology is willing or able to require an adequate EIS or write and adequate permit for imidacloprid on burrowing shrimp. We have plenty of experience inputting concerns to the as yet incomplete process related to imazamox. We have yet to see a level of response which would correct major deficiencies with those drafts. Rejection of concerns related to waterfowl and salmonids has been without merit and has relied on biased input from acolytes of applicants.

Further it is the understanding that imidacloprid tests have shown an inability to control burrowing shrimp when used in legal amounts. It would appear that this process could be an encouragement to violate the label and control them at the risk of the environment. This would be a repeat of the pattern established with current drafts mentioned above where after years of assurances that z marina and other species would be protected, actual drafts allow and therefore encourage z marina reduction in unestimated and unaccounted for amounts. In fact it seems possible that these two permits go hand in hand. As a systemic, imidacloprid is taken up by eelgrass and other plants. While it would kill plenty invertebrates on the grass, much would not get to the mud and shrimp. The cure for this could be to lay it on thicker, and or strip all eelgrass chemically to get it out of the way. Lack of monitoring and controls and limitations in the imazamox drafts would allow and encourage such activity. The draft EIS relies on round statements about clam bed improvement but does not account for ancillary motivations such as just described. Even some vast "public oyster reserves" contain manila clam beds. The whole reserve could be sprayed for eelgrass if japonica was declared present. In the past DNR leases of public tideland have been mechanically controlled for japonica and under drafts could be sprayed. A grower has testified repeatedly that the state should allow and encourage what would be defoliation of this public land if japonica were present in an amount that the grower/leaseholder determined to be a problem in his annual plan. Lease language allows this. A bypass provision in the SMA turns us loose with only precautions and limitations of an EIS if one is in hand, and these are notable only by their absence in subject drafts.

It is clear that the above are not the only, but are the sufficient, reasons to halt any action to permit another chemical on top of one with as yet inadequate analysis, controls, and

monitoring. A second set of risks on top of an improperly handled first set would be environmentally and legally unacceptable.

**From:** [Lubliner, Nathan \(ECY\)](#)  
**To:** [Rockett, Derek \(ECY\)](#)  
**Subject:** FW: latest pieces of the puzzle  
**Date:** Monday, February 10, 2014 6:45:16 AM

---

Hi Derek,  
The commenter below mentions imidacloprid.

Nathan Lubliner  
Aquatic Plant Specialist  
Water Quality Program  
[nathan.lubliner@ecy.wa.gov](mailto:nathan.lubliner@ecy.wa.gov)  
360-407-6563

---

**From:** Ross Barkhurst [<mailto:rp.barkhurst@hotmail.com>]  
**Sent:** Monday, February 10, 2014 3:52 AM  
**To:** Lubliner, Nathan (ECY)  
**Cc:** rone brewer; AGR MI Noxious Weeds; Commission (DFW)  
**Subject:** FW: latest pieces of the puzzle

Nathan, please add this to my testimony on the draft EIS and NPDES for imazamox. Much of this is also applicable to the scoping input for imidacloprid for Willapa Bay and Gray's Harbor. The paper googled is An Analysis of the Commercial Pacific Oyster Industry in Willapa Bay, WA: Environmental History, Threatened Species, Pesticide Use, and Economics by Emily Sanford, April 2012. This is my attempt to further pull together a warning about where Ecology is proposing we might go. Things are worse than the author proposes because the white sturgeon have finished crashing now and they ate a lot more burrowing shrimp than green sturgeon did. Further attempts to spray our way out of this will add waterfowl to the chain reaction list/ death spiral if we continue to let another shellfish market shift dictate the unmitigated fate of two formerly environmentally healthy bays. The widgeon eat the japonica tops and the pintail and mallard eat its rhizomes and the fauna in it. A lot of it. The Brant eat the z marina which would perish with japonica. Imazamox will kill the grass and imidacloprid will kill the fauna. The mud flats were never bare. They used to have large oyster reefs on them. The big picture is now much more complete, thank goodness in time to start over. An eyes wide open redo is mandatory.

Ross P. Barkhurst, 151 N. Nemah Rd West, South Bend, WA 98586

---

**From:** [rp.barkhurst@hotmail.com](mailto:rp.barkhurst@hotmail.com)  
**To:** [nwducks@frontier.com](mailto:nwducks@frontier.com)  
**CC:** [commission@dfw.wa.gov](mailto:commission@dfw.wa.gov)  
**Subject:** latest pieces of the puzzle  
**Date:** Mon, 10 Feb 2014 05:58:32 -0500

Google Willapa River Salinity ranges. Got down to 5th item, pdf- An analysis of the commercial Pacific Oyster----.

It confirms the conclusion I was coming to about what happened to the Bone River flats. It was harrowed, as was an area off Pickernel Creek closer to home here. Knew they harrowed for eelgrass. Did not realize the extent to which they harrow to turn up shells and singles out of the mud and bust up live clusters. And to do "leveling." That is the perfect description of how Bone River flats was transformed from the largest waterfowl foraging area I knew of to a well manicured vegetation free and duck free zone in 2012 or 2011. This paper also does a fair job of describing all fauna that is killed by carbaryl, and would be by imidacloprid. In combo with the shift away from reef culture of oysters, to singles and clusters all over the bottom, burrowing shrimp have become a bigger problem, whether they increased or not. Hatchery reared smolt go quickly to sea, and both sturgeon species are in big trouble. Lack of predators. So spray is all that is left to protect scattered bottom culture of oysters. As the eelgrass is knocked back, it no longer helps suppress shrimp, etc, etc. That before we get to spraying to maybe boost clam meat per ft squared. Even less grass, more room for shrimp to roam unmolested. Sounds like a death spiral to me, fueled by market shifts and overfishing and eelgrass reduction, with waterfowl caught in the middle. We have the big picture here and it is not pretty. The ducks have escaped, living on japonica until now. If we do not get imazamox without limits mitigated, they are next. The headlines could be, " A Failed Unsustainable Market Takes Two Bays With It (enabled by overly cooperative WA state agencies). This can be turned around with what I encouraged at the first "working meeting" on Japonica in Olympia with Ecology in 2011. What I encouraged was a look at cumulative effects. The death spiral above would be the poster child for cumulative effects. Not too late to turn this aircraft carrier around.

PS--note it turns out Willapa and Gray's Harbor are the only two bays in the US where carbaryl was allowed, and Ecology confirmed they would be the only place in West coast where imidacloprid would be used, now that EPA has delisted carbaryl. Amazing!