

From: [Mark Ballo](#)
To: [Rockett, Derek \(ECY\)](#)
Subject: Burrowing shrimp permit comments
Date: Friday, February 14, 2014 9:45:01 AM

Hello and thank you for opportunity to comment on the WGHOGA IPM permit for the use of Imidicloprid for the control of burrowing shrimp.

The oyster growers have a long standing problem with burrowing shrimp on our oyster beds with scant few tools or options for their control. Almost everything under the sun has been tested as a control tool both mechanically and chemically with very little success but at a high cost. Our IPM program has largely been under attack by the new wave of shrimp recruitment on our beds while our ability to control them has deminished over the years. Productive land is being lost while the demand for our products is greater than ever, this is a recipe for disaster for what are multi-generational family farms for many of us. We should be looking at increasing our ability to control the shrimp on our beds.

Oysters are a 2- 4 year crop depending on size needed for markets. Many have pointed to long line oysters as a solution. I am a long line oyster farmer and I can tell you the long lines will sink into the mud just like everything else on shrimp infested ground especially given the length of time they need to grow to market size. For ground culture this is even worse but it is not good for either method.

We need all the tools we can get into our tool chest for dealing with this problem. Imidicloprid has a lighter environmental footprint that Carbaryl which in my mind is exactly what we were asked to find as well as being one of the only things that has shown promise in terms of efficacy and toxicity.

Time is of the essence, please move this permit forward as we have spent millions and have provided everything that has been asked of us now it is time to put it to permit. I am sure the research conditions in the permit will help us to tie up loose ends technically speaking, but we need this permit now to get there.

Thank you,
Mark Ballo
Farm Manager
Brady's Oyster Inc,
3714 Oyster PL
Aberdeen, WA 98520
southbayballo@gmail.com