

From: darcher@wwest.net
To: [ECY RE Shrimp Control Permit Comments](#)
Subject: Control of burrowing shrimp in Willapa Bay
Date: Thursday, February 06, 2014 12:43:09 PM

Hello Derek Rockett. I am Ed Darcher, Pacific County spartina coordinator. I have been working in Willapa Bay since 1996; in our family business (Watershed Restoration Management), five years with the Willapa National Wildlife refuge (US F&W), and the last five years with Pacific County. Most of my work has been focused on spartina eradication. I am presently responsible for approximately three-fifths of the bay/estuary and very familiar with the ground, people and issues that comprise Willapa Bay. The following comments are my personal observations and opinions regarding the permit for imidacloprid.

There are no pollinators in the aquatic environment, especially on the flats holding burrowing shrimp (no vegetation except for eelgrass). The only possible contact would be by drift and that won't happen. As you stated, spraying is prohibited when winds exceed 10 mph. One could envision endless possibilities about the detrimental effects of imidacloprid to the environment but there would be no substance, something like a filibuster meant to delay until time expired. What is certain is the significant impact burrowing shrimp will have on the environment, economics and culture of Pacific and Grays Harbor counties unless action is taken soon. Unfounded concerns and conjecture delayed the use of imazapyr on spartina for years resulting in increased acreage to be treated and millions more dollars spent. Presently, 9,500 acres has been reduced to less than one with no negative consequences. The same situation exists for controlling burrowing shrimp and I strongly urge Ecology to approve the limited use of imidacloprid in Willapa Bay and Grays Harbor.

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