

**From:** [nathan](#)  
**To:** [ECY\\_RE Shrimp Control Permit Comments](#)  
**Subject:** Pesticides in Willapa Bay  
**Date:** Wednesday, February 12, 2014 7:00:49 PM

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To whom it may concern,

I am writing, as a concerned citizen, to request that the Department of Ecology take a strong stance against the introduction of pesticides into the environment and prohibit the use of imidacloprid and other pesticides in Willapa Bay oyster beds. Imidacloprid is a neonicotinoid pesticide. As a beekeeper, I am acutely aware of the unintended toxic effects that any pesticides, but especially neonicotinoids, can have. It is becoming increasingly apparent that this particular class of pesticides is at least partly to blame for the mass die-offs of honey bees and other native pollinators. While I do not believe that the application of imidacloprid to this estuary would likely have any direct impact on honey bees, I simply cannot imagine a more foolhardy practice than introducing a poison into an estuary teeming with biodiversity! Just as when these pesticides are sprayed on the land, this practice is sure to have unintended consequences.

I understand that the shellfish industry is of vital importance to the Willapa Bay region and the state as a whole. It is truly a blessing to have such amazing water resources such as those here in Washington. I also understand that there have been declines in production in recent years due to the ghost shrimp and eelgrass. However, these are symptoms of larger ecological problems. They were, no doubt, in large part created by a complex of abuses to the ecosystem, some local and some far upstream. Looking to a cadre of poisons as a solution to the problems that shellfishers face will certainly lead to further unforeseen consequences both to humans and other wildlife.

I believe that there would be many far more effective and holistic approaches to this problem that would better serve all interests. For instance I believe it would be far wiser for the shellfish interests to work with upstream interests to find ways to improve the salmon runs in the area. As I understand it, chum salmon used to act as a primary predator of the ghost shrimp within this ecosystem and that it has only been since the decline of salmon populations that the shrimp have been causing major problems. As I write this, it occurs to me that the use of pesticides in the water may even be contributing the weakening of salmon populations and thus ultimately making the problem worse. These are the types of unforeseen consequences that we will not and cannot know about until it is too late. As a citizen of this State and a shareholder in the public trust, I encourage the Department of Ecology to take a long-sighted approach to this problem and reject this proposal to intentionally introduce additional pesticides into Washington State waters.

Thank you for taking my comments into consideration.

Yours truly,

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