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**Subject:** WSR 14-03-137 Scope  
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A determination of the post-application environmental impact - of at least the ones identified in **WSR 14-03-137** - should be required and funded, if the permit is to be issued. Impacts of the chemical imidacloprid in other venues have been steadily emerging. Since this venue has unique properties it is likely that unique impacts there may be found.

To accomplish the impacts as outlined in the above paragraph a scientific base-line description of the current eco-system should be completed so that accurate comparisons can be made.

Prior to issuance of a permit, a study should be required to determine the proximate and fundamental causes of the current "shrimp population explosion". That study should lead to a study of mitigation of those causes so that further alternatives to imidacloprid can be identified.

The list of "animals" referred to in the "**Preliminary Content**" should be comprehensive of the area, to include micro-organisms, migratory fowl and other migratory marine life. Other animal life, such as the eggs and larvae of organisms (not to exclude oysters) within the impact area should also be included. A comprehensive inventory of all such animals in the impact areas should be obtained to assure the study is complete.

Thanks you for your consideration.  
Roy