

**From:** [Rebecca Chaffee](#)  
**To:** [Rockett, Derek \(ECY\)](#)  
**Subject:** Comments on the Use of Imidacloprid  
**Date:** Friday, February 14, 2014 4:28:58 PM  
**Attachments:** [Comments of Use of Imidacloprid.pdf](#)

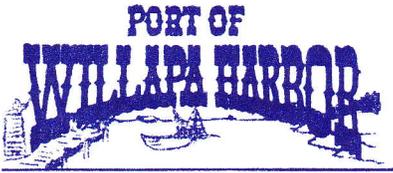
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Derek,

The Port of Willapa Harbor would like to submit the attached letter on the proposed use of Imidacloprid on commercial shell fish beds in Willapa Bay and Grays Harbor.

Thank you,

Rebecca Chaffee



1725 Ocean Avenue • Raymond, Washington 98577 U.S.A.

**COMMISSIONERS**

Timothy A. Bond  
Patricia L. Lignoski  
Larry D. Topping

Rebecca Chaffee, Manager

February 14, 2014

Mr. Derek Rockett  
Department of Ecology  
Southwest Regional Office  
P.O. Box 47775  
Olympia, WA 98504-7775

RE: Determination of Significance and Scope of EIS for Use of Imidacloprid in Willapa Bay and Grays Harbor.

Dear Mr. Rockett:

The Port of Willapa Harbor operates marina facilities on Willapa Bay in Raymond, South Bend, Bay Center and Tokeland. These facilities primarily service the Willapa Bay aquaculture industry. This industry is critical to our local economy and is the largest employment sector in Pacific County.

The Port does not have in-house scientific expertise to assess the impacts to the environment from Imidicloprid applications on shellfish beds in Willapa Bay and Grays Harbor. However, we request that the EIS include a cumulative review of the economic impact to both the shellfish industry and to the coastal communities dependent on this industry, for each proposed alternative including no action.

The viability of the local shellfish industry depends on an effective method to control burrowing shrimp. The loss or a significant decline for this industry would have very negative ramifications to our local economy.

We appreciate this opportunity to provide input on the scope of this EIS.

Sincerely,

Rebecca Chaffee, Manager  
Port of Willapa Harbor

cc: File

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Visit our website at: [www.portofwillapaharbor.com](http://www.portofwillapaharbor.com)

**From:** [Zentner, Greg \(ECY\)](#)  
**To:** [Cornett, Deborah \(ECY\)](#); [Rockett, Derek \(ECY\)](#)  
**Subject:** FW: Update from Ecology RE: actions related to burrowing shrimp and non-native invasive eel grass control  
**Date:** Tuesday, January 21, 2014 11:37:09 AM

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**From:** Toteff, Sally (ECY)  
**Sent:** Friday, January 17, 2014 11:05 AM  
**To:** Zentner, Greg (ECY); Moore, Bill (ECY)  
**Subject:** Fwd: Update from Ecology RE: actions related to burrowing shrimp and non-native invasive eel grass control

Fyi

Begin forwarded message:

**From:** Rebecca Chaffee <[portofwh@willapabay.org](mailto:portofwh@willapabay.org)>  
**Date:** January 17, 2014, 10:04:23 AM PST  
**To:** "Toteff, Sally (ECY)" <[STOT461@ECY.WA.GOV](mailto:STOT461@ECY.WA.GOV)>  
**Subject: Re: Update from Ecology RE: actions related to burrowing shrimp and non-native invasive eel grass control**

Sally,

I was just looking back through my emails and realized that I had never thanked you for the update on the burrowing shrimp and invasive eel grass control. As a port we have not been actively involved in this issue, but we of course support the local aquaculture industry.

Rebecca

----- Original Message -----

**From:** [Toteff, Sally \(ECY\)](#)  
**To:** [Gary G. Nelson](#) ; [Rebecca Chaffee \(portofwh@willapabay.org\)](mailto:portofwh@willapabay.org)  
**Cc:** [Moore, Bill \(ECY\)](#) ; [Zentner, Greg \(ECY\)](#)  
**Sent:** Friday, January 03, 2014 10:40 AM  
**Subject:** Update from Ecology RE: actions related to burrowing shrimp and non-native invasive eel grass control

Hello Rebecca and Gary,

Hope the new year is starting off well for you. I want to update you about some work Ecology is doing with shellfish growers on the Coast. Because of your leadership roles in Grays Harbor and Willapa Harbor, you could get questions about this. I'd appreciate it if you'd point them in my direction to get accurate information.

You may already know Ecology is offering a comment period and public meeting for two separate proposals related to commercial shellfish operations in Willapa Bay and Grays Harbor.

The Willapa/Grays Harbor Oyster Growers Association has requested Ecology consider two new control tools to support commercial shellfish. Use of the pesticide imidacloprid is being proposed to control burrowing shrimp that harm

commercial oyster beds, while use of the herbicide imazamox is proposed to control non-native eelgrass on commercial clam beds.

Ecology is inviting people to comment on:

1. the scope of an environmental impact statement (EIS) for the burrowing shrimp control proposal, and
2. a draft permit and draft EIS for controlling non-native eelgrass in the Bay.

While separate actions, the comment periods for each proposal are the same, Jan 2 to Feb. 15, 2014.

Ecology also will hold a public meeting on Saturday, Feb. 1, 2014 during which people can learn more about both of these proposals and submit comments on either proposal. The event will start at 10:00 a.m. and run through the afternoon at the Willapa Harbor Community Center, 916 West First Street, South Bend. It will include:

- Concurrent “Open House” sessions for both proposals
- Workshop, public hearing and public testimony on the proposal to control non-native eelgrass
- Workshop, public meeting and opportunity to provide scoping comments for the EIS studying the proposal to control burrowing shrimp

Additional information on the burrowing shrimp control proposal is available on Ecology’s website:

<http://198.238.211.77:8004/programs/wq/pesticides/imidacloprid/index.html>.

Additional information on the non-native eelgrass control proposal is available on Ecology’s webpage on the non-native eelgrass proposal:

<http://www.ecy.wa.gov/programs/wq/pesticides/eelgrass.html>

If you have any questions, do let me know and I’ll work with the best staff who can provide answers. Also, if your office receives questions about these issues, feel free to direct callers to us. Below is the media release just sent this morning.

Best Regards,  
Sally

*Sally Toteff*

Regional Director | Southwest and Olympic Office | Department of Ecology  
360-407-6307 | [Sally.Toteff@ecy.wa.gov](mailto:Sally.Toteff@ecy.wa.gov)

Assistant: Jennifer Greenfield  
360-407-6308 | [Jennifer.Greenfield@ecy.wa.gov](mailto:Jennifer.Greenfield@ecy.wa.gov)



**Washington State Department of Ecology**  
**News Release**

For Immediate Release 14-003

Jan. 3, 2014

[www.ecy.wa.gov](http://www.ecy.wa.gov)

**Media Contact:** Sandy Howard, 360-407-6408; 360-791-3177;  
[sandy.howard@ecy.wa.gov](mailto:sandy.howard@ecy.wa.gov)

**Ecology seeks comments on proposals to control  
non-native eelgrass and burrowing shrimp**

Pesticide Imidacloprid could be used to control burrowing shrimp that harm oyster beds in Willapa Bay and Grays Harbor; herbicide Imazamox could be used to control non-native eelgrass on commercial clam beds in Willapa Bay only

**OLYMPIA** – The Department of Ecology (Ecology) invites the public to comment on the scope of an environmental impact statement (EIS) for a proposal to control burrowing shrimp in Willapa Bay and Grays Harbor.

Public comment is also sought on a draft permit for controlling non-native eelgrass in Willapa Bay only.

**Proposal to control burrowing shrimp**

The Willapa/Grays Harbor Oyster Growers Association submitted an application to Ecology for a water quality (NPDES) permit to allow the association to use the pesticide Imidacloprid to control burrowing shrimp in commercial shellfish operations in Grays Harbor and Willapa Bay.

Burrowing shrimp destabilize oyster beds and impact oyster production.

As a part of the process to consider issuing a new permit, Ecology will prepare an EIS. Ecology is seeking comments on the scope of the EIS for this proposal through Feb. 15, 2014. Scoping helps the agency determine what potential impacts to analyze in the EIS. See the [scoping notice](#) to submit your comments.

Later in the year, Ecology expects to issue the draft EIS as well as a draft permit. Ecology will hold another public comment period and public hearing before a final EIS is issued and a permit decision made.

Carbaryl was permitted by Ecology for the control of burrowing shrimp on commercial shellfish beds in Willapa Bay and Grays Harbor through 2012. The growers association is seeking a permit for Imidacloprid as an alternative. For more information about carbaryl and the current permit for its use see: [Individual Permit for the Control of Burrowing Shrimp using Carbaryl on Commercial Shellfish Beds in Willapa Bay and Grays Harbor](#).

**Proposal to control non-native (*Zostera japonica*) eelgrass**

The shellfish growers association also has requested a new permit for the use of Imazamox to help manage the growth of non-native eelgrass called *Zostera japonica* on commercial clam beds in Willapa Bay.

According to the growers, these beds were historically sand/mud flats and just recently *Zostera japonica* has been colonizing these beds making it difficult to grow and harvest clams.

The EIS scoping period for the proposal to control non-native eelgrass closed Nov. 2, 2012, and Ecology has developed a draft EIS and a draft permit.

A water quality (NPDES) permit is required before the herbicide can be applied under the Washington State Water Pollution Control Act. The permit would regulate the use of Imazamox and marker dyes to manage *Zostera japonica* on commercial clam beds.

Ecology is seeking comments through Feb. 15, 2014, on the draft EIS and the draft permit to allow the use of Imazamox in Willapa Bay. See Ecology's

[website](#) for ways to submit comments.

### **Two separate but aligned permitting processes**

The environmental review and permitting processes to control burrowing shrimp are separate from the environmental review and permitting processes to control non-native eelgrass in Willapa Bay. However, the public comment periods for each proposal are the same: Jan. 2 to Feb. 15, 2014.

### **Public meeting**

People may submit comments on either proposal to the Department of Ecology (Ecology) through midnight Feb. 15.

Comments will also be accepted at a Saturday public workshop and public hearing in South Bend on Feb. 1, 2014. The meeting will start at 10 a.m. and continue through the afternoon. It will be held at Willapa Harbor Community Center, 916 W First Street, South Bend, WA 98586. The meeting format includes:

- Open houses on both proposals: 10 a.m. to 11 a.m. and 12:30 p.m. to 1 p.m.
- Workshops on both proposals, including presentation and question and answer sessions: 11 a.m. to 12:30 p.m.
- Public hearing on proposal to control non-native eelgrass and public comment opportunity on proposal to control burrowing shrimp: 1 p.m.

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### **For more information**

[Aquatic Pesticides website](#)

([www.ecy.wa.gov/programs/wq/pesticides/index.html](http://www.ecy.wa.gov/programs/wq/pesticides/index.html))

[Water Quality Program](#) ([www.ecy.wa.gov/programs/wq/wqhome.html](http://www.ecy.wa.gov/programs/wq/wqhome.html))

[Ecology's social media](#) ([www.ecy.wa.gov/about/newmedia.html](http://www.ecy.wa.gov/about/newmedia.html))

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