

From: [Niles, Matt \(DNR\)](#)
To: [Rockett, Derek \(ECY\)](#)
Cc: [SWENDDAL, KRISTIN \(DNR\)](#)
Subject: DNR Imidacloprid DEIS comments
Date: Monday, December 08, 2014 4:26:50 PM
Attachments: [DNR comments.pdf](#)

Hi Derek,

Attached are DNR's comments regarding the DEIS for the proposed use of imidacloprid on shellfish beds in Willapa Bay and Grays Harbor. We also dropped a copy in the mail this afternoon. Thanks,

Matt

Matt Niles

Assistant Division Manager—Rivers District
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December 8, 2014

Mr. Derek Rockett
Washington State Department of Ecology
Water Quality Program
Southwest Regional Office
PO Box 47775
Olympia, WA 98504

Subject: Comments regarding the Draft Environmental Impact Statement for the Control of Burrowing Shrimp using Imidacloprid on Commercial Shellfish Beds in Willapa Bay and Grays Harbor

Dear Mr. Rockett,

Thank you for the opportunity to comment on the above-referenced Draft Environmental Impact Statement (DEIS). The Washington Department of Natural Resources (DNR) manages state-owned tidelands in Willapa Bay and Grays Harbor. The proposed permit would allow the application of imidacloprid on up to 10,000 acres of tidelands in Willapa Bay and Grays Harbor over the five-year term of the permit.

DNR recognizes the need for the shellfish industry to control burrowing shrimp and supports their efforts to do so in a responsible manner. DNR has multiple aquatic land management responsibilities in the areas proposed for application of imidacloprid. For example, in addition to managing state-owned tidelands for shellfish aquaculture, our responsibilities include managing a commercial burrowing shrimp fishery. Burrowing shrimp are also a food source for green and white sturgeon and gray whales.

DNR's management of state-owned tidelands in Willapa Bay and Grays Harbor must consider these multiple interests. In broad terms, we believe that the DEIS has not adequately addressed important considerations regarding the use of imidacloprid. In some cases, we believe that there are insufficient or unclear references to support conclusions included in the document. In others, we believe more information is needed about potential impacts.

We look forward to sitting down and discussing our concerns. Thank you for your willingness to meet with DNR.

Sincerely,

Matt Niles
Assistant Division Manager, Rivers District

Cc: Kristin Swenddal, Aquatic Resources Division Manager