

From: [Margaret Barrette](#)
To: [Rockett, Derek \(ECY\)](#)
Subject: Comments re imidacloprid permit
Date: Wednesday, December 03, 2014 10:55:44 AM
Attachments: [NPDES_permit_imidacloprid_120114.pdf](#)

Please accept the attached comments on behalf of Pacific Coast Shellfish Growers Association. If you have any issues accessing the attached file, please contact me immediately.

Thank you for allowing the opportunity to submit comments.

margaret

Margaret Pilaro Barrette

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December 3, 2014

Mr. Derek Rockett, Permit Writer
Department of Ecology, Southwest Regional Office
PO Box 47775
Olympia, WA 98504-7775
Via E-mail – Derek.rockett@ecy.wa.gov



Dear Mr. Rockett,

Thank you for providing an opportunity to comment on the NPDES permit for the application of imidacloprid in the intertidal areas of Willapa Bay and Grays Harbor. On behalf of the Washington members of the Pacific Coast Shellfish Growers Association (PCSGA), I respectfully request issuance of the permit requested.

PCSGA was founded in 1930 to represent the interests of shellfish growers in the states of Washington, Alaska, Oregon, California, and Hawaii. PCSGA works on behalf of its members on a broad spectrum of issues, including environmental protection, shellfish safety, regulations, technology, and marketing. Washington members grow a wide variety of healthful, sustainable shellfish including oysters, clams, mussels, and geoduck.

Like any terrestrial farming group, shellfish farmers need tools to protect their lands and crops from pests and predators. Our members within the Willapa Bay and Grays Harbor area continue to deal with burrowing shrimp which impact their commercial shellfish operations and make them unproductive. It has been proven time and again that without an effective control tool, burrowing shrimp will destroy the beds growers rely on to farm.

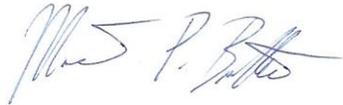
Shellfish is a sustainably produced, high-quality protein source. Demand for west coast shellfish remains extremely high despite the fact over 85% of the seafood consumed in this country is imported. Shellfish growers in Willapa Bay and Grays Harbor have committed significant resources to support their Integrated Pest Management (IPM) programs which allow them to farm. Over the past 5 decades, they have collected data which demonstrates how the control of the shrimp has benefited other marine species. Ground infested with burrowing shrimp is severely degraded, has little to no natural species diversity and provides little actual habitat value. In contrast, ground that has been treated for shrimp control are able to support a diversity of species, including high value commercial species which provide three dimensional habitat that is of equal or greater value than any other habitat in the estuary. Public resources have benefited significantly through the work and financial investment of shellfish growers through the IPM process and this should be considered as an ecological public service. Permitting documents should identify the contribution of growers in this regard and give consideration to limiting extra requirements for monitoring.

According to the public announcement, Ecology is considering draft permit conditions that would prohibit shrimp control in the South Willapa Bay. Such a prohibition is extremely troubling since it would eliminate from production over 6,000 acres of commercial shellfish beds. The prohibition would have a ripple effect on shellfish jobs and contribution to the economic vitality of the rural communities. Much of this area has been in production for a long

time and prohibiting control essentially closes the area. Many farms, particularly small family farms will feel the brunt of that action and will be forced to close. PCSGA opposes any restriction on shrimp control in South Willapa Bay and ask Ecology to re-examine the rationale for the prohibition and ensure it's based upon the best available science and research.

PCSGA encourages Ecology to approve a permit that allows for shrimp control for the entirety of Willapa and Grays Harbor. Thank you again for the opportunity to provide comment on this important issue. Please let me know if you need additional information.

Respectfully,

A handwritten signature in blue ink, appearing to read "Margaret P. Barrette". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Margaret Pilaro Barrette
Executive Director