



November 1, 2017

Derek Rockett  
Water Quality Program  
Washington State Department of Ecology  
PO Box 47775  
Olympia, WA 98504-7775

*Re: Draft Supplemental Environmental Impact Statement: Proposed Use of Imidacloprid for Burrowing Shrimp Control on Commercial Oyster and Clam Beds in Willapa Bay and Grays Harbor, Washington*

Dear Mr. Rockett,

Thank you for considering the Association of Washington Business's (AWB) comments on the Draft Supplemental Environmental Impact Statement for the Proposed Use of Imidacloprid for Burrowing Shrimp Control on Commercial Oyster and Clam Beds in Willapa Bay and Grays Harbor. AWB is Washington's oldest and largest statewide business association, and includes nearly 7,000 members representing 700,000 employees. AWB serves as both the state's chamber of commerce and the manufacturing and technology association.

AWB has been a proponent of the use of imidacloprid for control of *Neotrypaea californiensis* and *Upogebia pugettensis* since the proposal's inception. AWB members appreciate the opportunity to again support the Department of Ecology's permitting of this critical tool to protect the state's vital shellfish industry. The permitted use of imidacloprid is an essential tool both for Washington state's economic and ecological health.

### **Ecological Factors**

Washington State Department of Ecology's approval of Alternative 4 use of imidacloprid will provide multiple environmental and economic benefits by preserving the aquaculture industry. In chapter three of the April 2015 Final Environmental Impact Statement for imidacloprid use, Ecology lists ecosystem services provided by oyster beds including "water filtration, resulting in decreased suspended solids, turbidity, and increased denitrification; habitat for epibenthic invertebrates such as crabs; carbon sequestration; and stabilization of adjacent habitats" (Rockett, Grabowski and Peterson, 2007). Washington state's oyster population should be carefully preserved in Grays Harbor and Willapa Bay. Oysters and clams as foundation species ameliorate conditions for other organisms important to estuarine trophic preservation

including zooplankton, and boost marine biodiversity by providing clean habitat to other environmental stewards such as algae and barnacles.

Alternative 4’s permit conditions and associated mitigation measures would be protective of Washington state surface water quality standards—some of the most stringent in the nation—and of ESA-listed salmonids and green sturgeon.

The DSEIS is complete with several field trials not modeling, but demonstrating the proposed imidacloprid NPDES permit’s protection of ecological features in Grays Harbor and Willapa Bay. Imidacloprid has routinely and thoroughly been tested as a safe choice for restricting burrowing ghost shrimp populations. It boasts an impressive safety profile including a 5000 mg/kg bodyweight dermal LD50, a hydrolysis/photolysis half-life of mere hours, and few hazardous decomposition products (Guadalupe et. al. 2004, Ramirez et. al. 2004, Makhteshim Agan MSDS). Most importantly, the NPDES permit and its adaptive management options were the only choice considered with species-specific efficacy toward controlling burrowing shrimp at manageable populations of less than ten burrows per square meter.

### Economic Factors

Of all global estuarine habitats, 85% of oyster reef habitat has been lost globally over the past 130 years (Lotze et al. 2006, Beck et al. 2011). Meanwhile, Grays Harbor and Pacific Counties struggle to compete with other economic regions of Washington state with the second- and third-highest unemployment percentages statewide. Supplying 25% of the nation’s oyster market, the area’s family-wage jobs—and the infrastructure, services and economic activity they support—are well-documented in the DSEIS. In the 2013 Northern Economics assessment, aquaculture promoted an impressive \$1.82 economic multiplier effect for every dollar spent by oyster growers, and generated nearly 3,000 jobs. The replacement cost analysis demonstrates that shellfish aquaculture can provide up to

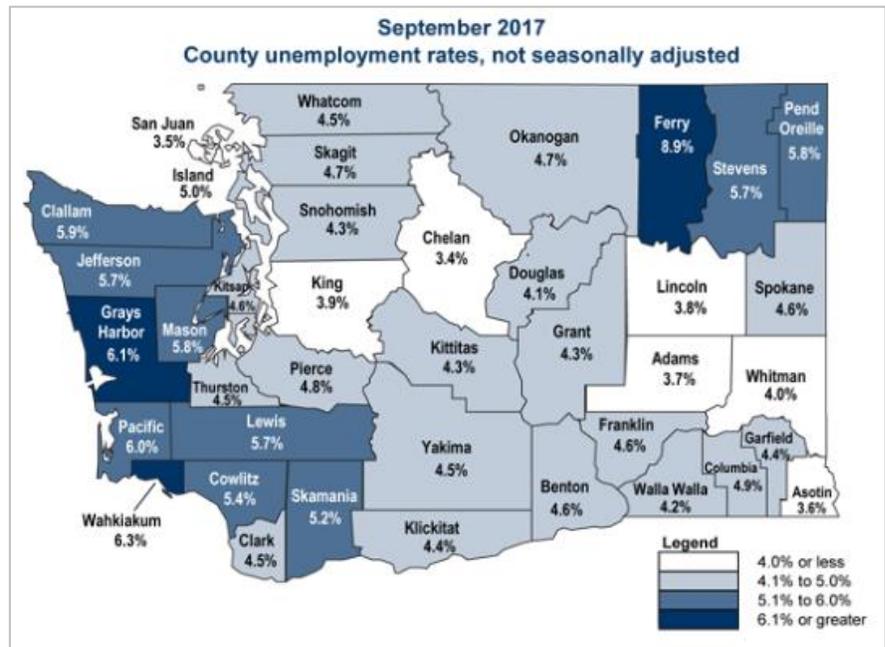


Figure 1: Grays Harbor County and Pacific County suffer some of Washington state’s highest unemployment figures. Source: Washington Employment Security Dept.

the 2013 Northern Economics assessment, aquaculture promoted an impressive \$1.82 economic multiplier effect for every dollar spent by oyster growers, and generated nearly 3,000 jobs. The replacement cost analysis demonstrates that shellfish aquaculture can provide up to



PO Box 658 / Olympia, WA 98507-0658 / 1414 Cherry St. SE / Olympia, WA 98501 / 360.943.1600 / [awb.org](http://awb.org)

\$884,400 in ecosystem benefits in Oakland Bay which would otherwise be afforded by taxpayers or foregone altogether. At a time when Washington state is feeling more diaspora between the living and working conditions of rural versus urban areas, rural natural resource development sectors—some of the only propagators of original wealth in the private sector—should be protected. In the last decade, the majority of jobs lost nationally and in Washington state were in rural natural resource extraction (Economic and Revenue Forecast Council 2017). Those remaining employment opportunities are defended by opportunities like an imidacloprid NPDES permit for shellfish growers.

Thank you for considering AWB's comments on the Draft SEIS for the use of imidacloprid to control burrowing shrimp in Grays Harbor and Willapa Bay. We encourage the Ecology Water Quality Program to continue its support of oyster and clam growers, harvesters and communities in Grays Harbor and Willapa Bay by following the findings of the Draft SEIS and issuing a Draft NPDES Permit. We look forward to future dialogue and remain committed to preserving Washington state's vital aquaculture industry.

Sincerely,

Gary Chandler

A handwritten signature in black ink that reads "Gary Chandler". The signature is written in a cursive, flowing style.

Vice President, Government Affairs  
Association of Washington Business