



PROMOTING THE PROTECTION, CONSERVATION AND RESTORATION OF NATURAL FOREST ECOSYSTEMS AND THEIR PROCESSES ON THE OLYMPIC PENINSULA, INCLUDING FISH AND WILDLIFE HABITAT, AND SURROUNDING ECOSYSTEMS

November 1, 2017

Dr. Derek Rockett
Water Quality Program
Washington State Department of Ecology
Email: burrowingshrimp@ecy.wa.gov

Via Electronic Communication

Comment: Permit for Imidacloprid Use in Willapa Bay and Grays Harbor

Dear Dr. Rockett:

I'm writing on behalf of the Olympic Forest Coalition to urge you to reject the permit to allow the use of imidacloprid in Willapa Bay and Grays Harbor. The Olympic Forest Coalition is a membership organization based on the Olympic Peninsula working to protect the natural landscapes and waterscapes in Washington State, including marine waters associated to the Olympic Peninsula. Thank you for the opportunity to comment on this important environmental issue.

Imidacloprid is a dangerous pesticide that many scientific studies have found to cause significant harm to non-target species, including aquatic invertebrates. Young fish of many species including our native salmonids spend much of their early life cycle in estuaries where they adapt to living in a salt-water environment before out-migration. These chemicals are also linked to declines in pollinators and insects. The use of this pesticide in Willapa Bay and Grays Harbor should not be considered, given the global importance of the area for migrating shorebirds and other aquatic life.

The Grays Harbor National Wildlife Refuge, the "Bowerman Basin", is the spring migration of thousands of shorebirds and has been recognized as a Western Hemisphere Shorebird Reserve Network Site. Bowerman Basin and five other sites within the estuary have been designated as Washington State Important Bird Areas. According to the scientific journal Environmental Science and Pollution Research International:

"Imidacloprid and fipronil were found to be toxic to many birds and most fish, respectively. All three insecticides exert sub-lethal effects, ranging from genotoxic and cytotoxic effects, and impaired immune function, to reduced growth and reproductive success, often at concentrations well below those associated with mortality. Use of imidacloprid and clothianidin as seed treatments on some crops poses risks to small birds, and ingestion of even a few treated seeds could cause mortality or reproductive impairment to sensitive bird species".

OFCO urges the Department of Ecology to work with industry to find reasonable alternatives to imidacloprid that will not threaten important ecosystems.

Thank you for your kind attention and consideration of these comments.

Sincerely,

Patricia Jones, PhD
Executive Director