

Farmed Geoduck Clams
ARCADIA POINT SEAFOOD
On Totten Inlet, Puget Sound, Washington

October 31, 2017

Email: burrowingshrimp@ecy.wa.gov
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Southwest Regional Office
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Re: Draft SEIS for Proposed Use of Imidacloprid for Burrowing Shrimp Control on Commercial Oyster and Clam Beds in Willapa Bay and Grays Harbor

Thank you for this opportunity to provide comments on the draft SEIS. Our family operates a small shellfish company in South Puget Sound. Although burrowing shrimp are not as large a problem on our farms as they are in the Willapa Bay and Grays Harbor areas, we have seen first hand the negative impacts they can have on the ecology and productivity of tidelands.

We recognize that Ecology is in the pre-decisional phase of the process and the current focus is on the draft SEIS. However, before turning to the SEIS we want to make it clear that we support issuance of this NPDES permit as soon as is reasonable, with of course appropriate conditions and monitoring requirements that are (1) operationally realistic, (2) aligned with best available science/information, and (3) allow for adaptive management as experience dictates.

Although we do not have the qualifications to provide a useful critique of the draft SEIS, we have some general observations to share. We base these comments on our understanding that the applicants favor the option of reduced acreage (500 acres per year) with ground-based application, as part of an Integrated Pest Management program.

1. In 2015, Ecology issued a permit for use of Imidacloprid on 2,000 acres using helicopter aerial spraying. Ecology included conditions and monitoring requirements that it believed were sufficient to mitigate any potential significant unavoidable adverse impacts and thus meet clean water requirements. There was nothing in the updated SEIS research and literature reviews to indicate that the same could not be true for the current "reduced acreage-ground based application" option. Similar to 2015, we believe appropriate conditions, monitoring requirements, and experiential-based adaptive management can address any new findings/concerns.

2. It was interesting to note how often the SEIS analysis indicated no significant unavoidable adverse impacts, and in the few instances (e.g., sediments and animals) where potential impacts existed, they were localized and short-term with fairly rapid recovery. Thus, supporting our comments in point 1.

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3. Public concerns about impacts to pollinators and crab are worth noting. Honey bees, generally considered the most important pollinator, as well as other pollinators such as wasps, flies, butterflies and even hummingbirds rarely frequent marine tidelands. With the elimination of helicopter spraying, any perceived impacts on pollinators due to wind-drift are virtually non-existent. Regarding impacts to juvenile and planktonic forms of Dungeness crab, the Coalition of Coastal Fisheries, which includes several WA crab fisher organizations, has written in support of permit issuance—it is hard to believe it would do so if the crabbers felt this permit threatened their resource. From personal communication, it is our understanding that the magnitude of any impact to the crab population is small given the abundance levels at the life stages discussed in the SEIS (especially when compared to impact on adult crab of habitat lost due to shrimp).

4. One of the areas of uncertainty mentioned was not enough scientific information and field studies in marine environments. We agree there are unanswered questions and believe that this smaller-acreage proposal offers an ideal opportunity for empirical research and observation to help answer these questions and to do so on a small, but still commercially viable, level.

5. Although burrowing shrimp are native and serve a role in the ecosystem, there is truth to the saying of “too much of a good thing”. Their overabundance is negatively affecting the estuary as whole, turning bio-diverse tidelands into vast quicksand deserts. Some may see only the “self-serving” aspect of commercial growers wanting to save their once productive beds, we choose to see an opportunity to use commercial growers (at their expense) to help protect the estuary. Small investments can have large returns. For example, it is possible to protect 100 acres of habitat from adult shrimp in-migration by treating only the outside perimeter, say 5-10 acres, of the area.

The growers of Willapa Bay and Grays Harbor have worked tirelessly to have an effective Integrated Pest Management program that balances environmental, economic, and cultural goals. There is every reason to believe this same dedication will continue in the future under a permit for burrowing shrimp control using Imidacloprid.

Sincerely,



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