

## Northwest Center for Alternatives to Pesticides

We, the undersigned, support efforts to protect this fragile ecosystem from a potentially dangerous pesticide application. This plan is understudied, inadequate and fails to protect community and environmental health!

We support timely efforts to expand promising alternatives to neonicotinoids and to increase their feasibility and effectiveness. Investments should be made in educational, technical, financial, policy, and market support to accelerate adoption of alternatives rather than continuing to rely on highly toxic pesticides. Research and demonstration are needed to determine and improve the most effective alternatives and their respective potential and feasibility for farms of different sizes, locations, shrimp population density, and access to equipment. The state should invest its resources in these efforts prior to and instead of allowing toxic contamination of state estuaries.

Department of Ecology must protect Washington's water, wildlife, public health, and local economies from the harmful impacts of toxic pesticides. The future of oyster farming in Washington State depends on the industry's ability to adopt sustainable cultural and management strategies.

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Signed: Northwest Center for Alternatives to Pesticides Staff



**AND THE FOLLOWING INDIVIDUALS:**

<b>Name</b>	<b>State</b>	<b>Additional Comment</b>
Ashley Chesser	OR	Please protect community and environmental health by denying this application. We need alternatives, not toxic contamination of Washington waters.
Kathleen Bauer	OR	
Kristi Johnson	OR	
Callie Martin	WA	
Andrea Stapleton	OR	Andrea Stapleton
Marianne Tompkins	WA	
Tia Savedo	WA	
Stacie Lerch	WA	WA Dept of Ecology be responsible and set an example for finding pesticide ALTERNATIVES to protect our health now and for the future!! I am disabled by Multiple Chemical Sensitivity. The future of oyster farming in Washington State depends on the industry's ability to adopt sustainable cultural and management strategies."
Ilsa Olsen	WA	
Pamela Madigan	WA	
Wendy Hughes	WA	Wendy Hughes
Matt Wheeler	WA	
Deborah Petersen	WA	
Darla Wrobski	IL	Enough with the pesticides, stop POISONING EVERYTHING! There are healthier alternatives!!!!!!
Laurie Enger	ID	
Andrea Downs	WA	

Brendan Mardesich	WA	
Kate Cudaback	WA	
Amanda Snelson	WA	This is disturbing... I've worked around pesticides (of all types) and all have Federal Warnings to Not apply near water ways or even ditches!! There is a reason for these warnings!!! Aquatic life is very sensitive. There's too much pollution in our oceans as is... what are they thinking????
Samantha Kilgore	WA	
Justus D'Addario	WA	
Daniel Claussen	WA	
Ingrid Ford	WA	Ingrid
Marcia Rutan	WA	Marcia Rutan
Jilena Alpert	WA	
Jean Hokanson	WA	
Lucinda Herring	WA	Lucinda Herring
Margaret Tuffey	WA	I have lived on an over-dredged oyster bed beach for nearly 25 of my 77 years, and would very much appreciate my grandkids to swim, boat & fish out there without the dread of poisoning them. PLEASE continue to fight to preserve our environment... we only have the 1 to go around.
Adele Dawson	PA	
Rebecca Smith	OR	
Constance Huff	OR	Constance Huff
Lisa Wallace	OR	LISA M WALLACE
maeve sowles	OR	
Charlotte Maloney	OR	This must be addressed for the economy of the area and the health of the habitat.
Carol Kibble	WA	
Susan Medlin	ID	Susan Medlin
Elizabeth Slikas	OR	Elizabeth Slikas
Lise Olney	MA	The use of toxic pesticides to control native species is irresponsible and short-sighted. I urge you to reconsider this plan.
Jean Marr	OR	We do not understand this ecosystem enough to be messing around with managing through chemical application.
Marguerite Dessornes	CA	Protect our waters and our native species! No to insecticides in our water!
Letitia Noel	IL	
Sylvia Samuolis	CA	
Rick Ray	OR	
Ken Schefter	KS	
Kyenne Williams	OR	
Rick Ross	OR	
Mary Foltz	CA	destruction of native species in order to promote commercial oyster farming is short sighted and will cause a domino effect throughout the marine ecosystem - please do not proceed with these plans!

Paula DeFelice	CA	This insecticide doesn't target only one or two species. It will deal a terrible blow to the entire ecosystem.
jacque travis	OR	
Eva Wickliffe	OR	
Whitney Neugebauer	WA	Whitney Neugebauer
Ray Hearne	NC	
Stephen Auerbach	OR	
Molly Brown	CA	Please place the health of the whole ecosystem above the short-term profits of one industry.
mark hanson	MA	neonicotinoids such as imidacloprid are extremely dangerous. Using them in a watershed will kill more than the shrimp being targeted. Other means of raising oysters that don't require this approach should be done instead. Furthermore, imidacloprid is also dangerous for humans and finally it will be persistent in the silt for years.
Lori Weber	TN	Lori Weber
Sandra Joos	OR	
Bryce Hansen	WA	
Irene Bensinger	WA	
Linda Perrine	OR	
C. Kasey	VA	C. Kasey
Alisa Rettschlag	ID	
Gina Massoni	WA	

Jennifer Davis	OR	<p>As a veteran of 20 years as a beekeeper, who firsthand has seen a radical and alarming loss of our bees, I urge you to abandon the idea of using the highly Bee-toxic Imidacloprid in our waterways. Bees must drink water. Further, studies have found Neonicotinoids in water and air samples- showing that these pesticides do not readily breakdown and can easily migrate into the air and even the rain cycle.</p> <p>Bees are crucial for pollinating 70 Of 100 of our most commonly eaten foods. They contribute billons annually to our economy- and one in twelve jobs in the US is currently food-related. In short, we need to protect our bees, which are disappearing precipitously.</p> <p>Recent studies have found 700 species of native bees, nearly 1 in 4 species, are threatened or spiraling toward extinction in the US.</p> <p>Neonicotinoid pesticides (which include imidacloprid) have been indicated in many scientific studies as significant contributors to our current Bee decline.</p> <p>Further, if all the systemic pesticides, Imidacloprid was found most likely to penetrate soils vertically. This indicates one application of Imidacloprid to waterways could result in the pesticide accumulating in the beds where you grow oysters, harming the oysters and other aquatic creatures, and the humans who consume them.</p> <p>I strongly urge you to be more creative and exhaustive to solve your invasive shrimp problems. For example, could these shrimp be extracted with wet vacuums then sold to the pet foos industry to pay for the costs of extraction? You may find locals in Wallapa Bay quite willing to buy these shrimp to feed their pets to support oyster farmers and to protect the bay.</p>
Judy Lane	CA	
Virginia Young	LA	
Helen Rueda	OR	Helen Rueda
Michelle Sheldon	OR	
Ellen Singer	OR	Ellen M Singer
Nancy Lyles	OR	
Linda Carlson	CA	Please protect our water, our children and the future!
Gary Ladenaes	OR	Pesticides sh should not be used in an ocean environment as the harm to other organisms cannot be controlled.
Ilene Mandelbaum	CA	
Susan Garber	OR	
Howard Blumenthal	OR	
Charles and Reida Kimr	OR	Herbicides and pesticides are all toxic to invertebrate life, aquatic or land based. As these creatures are the base of life's pyramid, we are playing with fire in mindlessly destroying systems of nature whose many ways of supporting our whole ecosystem are but imperfectly understood.

Cindy Risvold	IL	
Diane Weinstein	WA	
Richard Cerie	WA	It does not make sense to kill everything just to protect an industry.
Christina Conroy	WA	Christina Conroy
Jesse Kirkham	IN	
terri silliman	OR	
Karen Khan	MA	
F Rodrguez		
Gail Chism	WA	
Brenda Gaines	OR	
Ande Kobek	WA	The time is now to do what is right.
susan delles	OR	Please do not introduce this deadly chemical into this ecosystem
Janelle Hopper	WA	
Cristina McCutcheon	CA	The potential for unintended, and irreversible, consequences is great. Please do not risk the long term health of this ecosystem for short term financial gain.
Lisa Yeeles	WA	
Caroline Dieterle	IA	It's a crazed idea to spray that poison in the water. It will kill and/or sicken many more organisms besides your "target species" .
Louis Harris	WA	
Jaclyn Hise	OR	
Robert Buscaglia	NE	
Gwen Vernon	WA	
Caitlin Roberts	WA	
Erin Perkins	WA	This sounds like a bad idea due to all the life it will effect. Those chemicals will end up contaminating the food chain. Remember, pesticides come from the same chemical family as nerve gas and other chemical warfare. Please -Do No Harm- conduct thorough studies and seek out lots of public input before making decisions that could have irreversible consequences.
Monique Kirby	OR	Monique Kirby
Russ Axelrod	OR	In addition to the NCAP comments outlined, we are long time property owners on the Long Beach Peninsula and are very concerned about the proposed pesticide use in the absence of further analysis/diligence. I am also a licensed geologist and hydrogeologist in WA with more than 30 years experience in environmental cleanup and restoration. I urge Ecology not to move forward with this "experiment" in this sensitive aquatic setting.
C. K. Cunningham	CO	
Merlin Emrys	NM	
Curtis Eivers		
Jules Michel	OR	Alternative growing methods exist which would allow oyster production to continue, albeit at a lower profit margin. One clear example was found in Drakes Estero where racks were used for decades before removal to create the marine wilderness now there.

Alicia Mariscal	WA	Alicia Mariscal
Marilyn Jackson	WA	Please protect our land and water. Everything is connected. Marilyn Jackson
Phyllis Chavez	CA	
Mandy Gregory	WA	
Yvonne Davis	WA	
Shea Scribner	WA	
Katherine Schultz	WI	Katherine Schultz
Rachel Koller	WA	
Annette Frahm	WA	
Vonda Welty	OR	
Ian Schooley	NV	
Ellen Glaccum	BY	
Carrie Winfield	WA	
Sharon Castle	OR	
Donna Payne	OR	
Allison Warner	WA	<p>Ecology should not be "testing" an area of open water with a broad spectrum pesticide for the benefit of one shellfish grower, because of where his property is situated. he is not guaranteed a "right" to grow shellfish, if they just won't grow in that location. It is unbelievable that we should be harming native aquatic organisms for the benefit of the shellfish industry, period. There is no public benefit in this action, only private, therefore it should not meet the test for SEPA. Also, without including in the study the broad scale ecosystem effects on other organisms with unknown or to date undocumented roles in the ecosystem food chain, it is irresponsible to perform this study. At the very least, documenting the longevity, and the impacts to other species in the sediment and water columns should be tested before this study goes forward, rather than use WA State waters and organisms as guinea pigs for no public benefit or reason, other than the desires of one farmer. This study could upset a balance during a time of changing sea levels that tips the system toward further risk of invasive species colonization, negatively effecting the entire shellfish(including crab) and sea food industries, as well as recreational fishing. Is the role of ghost shrimp fully understood in ecoystem resilience for instance? Performing studies with harmful substances in open water is the height of irresponsibility, especially knowing that this is a broad spectrum toxicant. Spraying poisons in our waters, when so many millions of dollars are spent each year on restoring salmon is just plain stupid and it is also not in alignment with WA state residents interests and wishes, nor is it in alignment with WA state law. Even if the treatment is found to be effective on ghost shrimp and the other shrimp, the industry will not be using this broadscale toxicant due to public opinion who will not buy the shellfish if this is done. This would be damaging to the shellfish industry as a whole. And without testing of the effects on the other organisms in the system, this study does not really address the real question- is it safe? And can we really test the cumulative effects over time of this pesticide?</p>

Susan Deemer	ID	I have a wonderful memory of a visit to Willapa Bay about 5 years ago. We ate freshly harvested oysters and local organic vegetables. Please protect this very fragile native ecosystem and do not allow pesticides to be used.
Barb Greene	OR	
Julie Ostoich	CA	
Kyle Rolnick	OR	Water is such a precious resource, please give it all the chances you can to stay clean and safe.
Calli Madrone	OR	Calli Madrone
Martha Clatterbaugh	WA	Endangering an entire ecosystem for the sake of one commercial business, even a very important one, is NOT a good idea!
Miranda Scalzo	WA	
Diane Bungum		
Wendy Simmons	OR	
Linda Parrish	OR	
Teresa Beutel	NY	
Sherry Tenn	HI	
Patrick Green	WA	
Maia Kazaks	OR	
Elizabeth Ellis	WA	
Dianne Ensign	OR	I'm a lifelong environmentalist dedicated to protecting the earth. The use of toxic pesticides needs to be taken much more seriously, particularly in fragile and vital ecosystems.
Kim Leval	OR	
James Baker	OR	
Grace Mayer	OR	
Roxanne Shive	OR	
Steven Macdonald	WA	
Jessica Harrold	ID	