

Olympia Beekeepers Association

(Email Submission)

Hi Derek,

While I had been able to attend the public hearing and comment in Lacey on the proposal to spray imidacloprid in Willapa Bay and Grays Harbor, I did want to send my comments in writing as well (which I thought I was able to do through today, November 1st), particularly to drive the point home that beekeepers had no idea of the extent the damage and fallout would be and persist regarding the neonicotinoid pesticides. There was widespread use of neonicotinoids before sufficient studies had been done to determine the effects on pollinators. When the first neonicotinoid was granted a conditional registration, no significant scientific studies had been performed and the one that was done was flawed and didn't take into account normal honey bee behavior. The EPA's own scientists expressed concern about the harmful effects of neonicotinoids on bees. Now we are in a situation where the scientific information we've gained in numerous studies supports just how harmful these chemicals are to our pollinators and the damage that has contributed and is still contributing to our pollinator population declines.

DOE has the advantage of referencing a significant body of science that has documented just how toxic this class of pesticides is to invertebrates, birds and pollinators and there will be collateral damage in the bay. Knowing the significant risks and the behavior of these chemicals you have a far better position than the beekeepers of 10 years ago who learned this lesson the hard way and are still suffering the consequences as are the bee populations. Armed with that information I don't see how that kind of scale-tipping could be considered for the bay which is obviously a system already out of balance. If beekeepers had known what the potential devastating consequences of these pesticides could be, we could have taken appropriate action. We had no idea.

Thank you for your time, Derek. It was very nice to meet you in Lacey.

Very best regards,

Laurie