

Nathan Donley: Great, thank you. My name is Nathan Donley. I am a senior scientist at the Center for Biological Diversity and a Washington state resident. On behalf of our more than 1 ½ million members and supporters nationwide – including more than 40,000 in the state of Washington – I urge you to deny this permit to spray Imidacloprid on our shoreline. First, I do want to thank you for the analysis that you've done. A lot of work has been put in to this and it is a very in-depth piece of work. So thank you for that. But ultimately you have to make a decision on what you know. And right now we know very little. I think there are so many data gaps and so much uncertainty in this analysis that to make a competent and informed decision would be near impossible. Will there be synergistic effects with other pollutants in these areas? Will there be indirect effects to birds and fish that use these prey species that will be reduced? How many Dungeness crabs is it okay to kill before it affects the population or before it affects harvest numbers? Will Imidacloprid residues carry over to the following year and accumulate in the sediment in these areas? And these are just questions that we don't have answers to yet. But we do know that Canada's Pest Management Agency has proposed to ban Imidacloprid – not due to impacts to pollinators or birds, but due to impacts to aquatics and vertebrates, specifically. And there is a lot of agriculture in Canada and we know that insects are very good at developing resistance to neonics. This proposal seeks to spray Imidacloprid at levels that will eventually kill around 60-80% of the shrimp in the plot. This is tailor-made for chemical resistance to develop. Over 5 years, all that will happen is the resistant shrimp will be selected for and expanded and before you know it Imidacloprid is ineffective and we're back to square one.

At best, this is an ill-advised mandate that will provide temporary relief. And at worst, this will wreak havoc on these ecosystems in ways that are difficult to predict with the data we have now. Nowhere in either of the environmental impact statements is there mention of why burrowing shrimp are overgrown in these regions in the first place. We do know that it is likely human-caused. But we're here focusing on alleviating the symptom when we should be focusing on fixing the problem. We've been on the path of killing a native species so we can largely grow a non-native one, and it's a path that leads to nowhere.

Again, I urge you to deny this permit. Thanks