

## Gina Massoni

I 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! Please take a look at the concerns the Northwest Center for Alternatives to Pesticides has identified. These also include suggestions for moving forward:

- The presence of data gaps undermines Ecology's conclusion of no significant adverse effects.
- Evidence for minimal impact to non-target invertebrates is lacking or contradictory.
- Field trials left many questions unanswered. There is inadequate analysis of the effects to threatened and endangered species and no recognition of potential impact to two nearby National Wildlife Refuges.
- There are impacts to Dungeness crab.
- There is uncertainty regarding important indirect effects and Ecology understates imidacloprid properties (environmental fate) in predicting effects.
- Buffers to protect against human consumption are inadequate.
- We recognize the importance of the oyster industry to Pacific County and to the state of Washington, and we support efforts to improve Integrated Pest Management (IPM) practices and research and demonstration of non-chemical alternatives.

I 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.