## Susan Rudnicki

Numerous studies have shown the persistence of neonicotinoids in the environment, their danger to NON-target birds, arthropods, and aquatic creatures of all kinds. See this scientific paper link---https://www.frontiersin.org/articles/10.3389/fenvs.2016.00071/full Quote---" The high toxicity of these insecticides to aquatic insects and other arthropods has been recognized"

The SEIS does not adequately address synergistic effects, including impacts of imidacloprid combined with other chemicals ("inert" ingredients, other chemicals used in the bays, and other pollutants) or other stressors. The scientific understanding of synergism from so-called "inert ingredients" has shown they are often responsible for SEVERE toxic effects and have not been properly regulated to recognize the known risks. Here is a link on this effect from just ONE of dozens ----https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1764160/