

November 1, 2017

Mr. Derek Rockett, Permit Writer  
Department of Ecology, Southwest Regional Office  
PO Box 47775  
Olympia, WA 98504-7775  
Via E-mail – [burrowingshrimp@ecy.wa.gov](mailto:burrowingshrimp@ecy.wa.gov)



Dear Mr. Rockett,

Thank you for providing an opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) relating to the Willapa Grays Harbor Oyster Growers Association's (WGHOGA) permit application to use the pesticide Imidacloprid on burrowing shrimp in Willapa Bay and Grays Harbor. These comments are submitted on behalf of the members of the Pacific Coast Shellfish Growers Association (PCSGA).

For nearly a century, PCSGA has supported shellfish growers from Washington, Alaska, Oregon, California, and Hawaii on a broad spectrum of issues including environmental protection, shellfish safety, regulations, technology, and marketing. Our members represent multiple generations of families who, through their farms, provide much needed economic contribution to our rural coastal communities. For example, the oyster industry is the largest private employer in Pacific County, accounting for approximately 1,700 family-wage jobs.

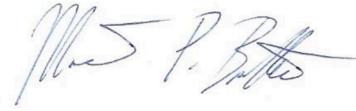
The sky-rocketing populations of burrowing shrimp in Willapa Bay and Grays Harbor are altering the ecosystem, turning tidelands into muck, and destroying critical habitat for birds, fish, shellfish, and phytoplankton. This unchecked progression and broad environmental impacts which the shrimp cause can only be slowed. Our members have spent much of the past decade exploring options to address an infestation of burrowing shrimp which has left once healthy oyster growing lands, eelgrass beds, and bird feeding grounds entirely unproductive.

The PCSGA's Board of Directors, which includes representation from the regions of both Puget Sound and Willapa Bay, as well as other west coast states in which we have members, took a position in support of the use of legally approved methods necessary to conduct Integrated Pest Management (IPM). The current permit application before Department of Ecology is a necessary step in allowing shellfish growers access to effective tools and methods under IPM.

The findings of the SEIS support the issuance of a draft permit for the use of Imidacloprid to control burrowing shrimp in Willapa Bay and Grays Harbor. There has been appropriate analysis and sufficient evidence to support the alternative (previously called "Alternative Four") within the SEIS, which allows IPM on up to 500 acres per year in Willapa Bay and Grays Harbor with no aerial applications by helicopter. This alternative, which is smaller in scope and different in method from the 2015 SEPA process, reflects best available science and a refined scope of the IPM intended to be used. Additionally, the mitigation measures considered for this alternative seem to adequately offset the potential impacts. Department of Ecology is encouraged to accept this alternative as preferred and continue with the process towards issuance of a draft permit.

Thank you again for engaging the public in this process and requesting review and comments. If you need additional information from me, please do not hesitate to contact me at [margaretbarrette@pcsga.org](mailto:margaretbarrette@pcsga.org) or 360-754-2744.

Respectfully,

A handwritten signature in black ink, appearing to read "Margaret P. Barrette". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Margaret Pilaro Barrette  
Executive Director