



May 11, 2018

Washington State Department of Ecology
ATTN: Rich Doenges
Rich.doenges@ecy.wa.gov
Southwest Regional Office
PO Box 47775
Olympia, WA 98504

RE: Public Notice of Intent to Deny WGHOGA National Pollutant Discharge Elimination System (NPDES) Permit

Dear Mr. Doenges,

This letter concerns the Department of Ecology (Ecology) tentative decision to deny the Willapa-Grays Harbor Oyster Growers Association (WGHOGA) application for a NPDES permit for the neonicotinoid pesticide imidacloprid. Audubon Washington and 14 Audubon chapters in Washington support Ecology's decision and agree with the department's conclusions that the proposed discharge would violate sediment quality standards, as set out in WAC 173-204-415(1)(a)-(j).

Audubon has shared our concerns about the potential impacts of imidacloprid use on birds and other non-target organisms through multiple public comment opportunities and through direct communication with Ecology staff. We appreciate Ecology's careful evaluation of imidacloprid field data, scientific literature, and national and international guidance in reaching this decision. We agree with Ecology's conclusions that the proposed pesticide application would have too great an impact on benthic invertebrates in the discharge area and would result in negative impacts to food resources for birds and fish. Uncertainty about long-term impacts of imidacloprid use in the estuarine environment is also a serious concern.

Audubon's interests are to encourage lasting solutions that will help the industry end its long-standing reliance on pesticides and create conditions amenable to ecologically-sustainable and economically-rewarding shellfish aquaculture. We are eager to work together with shellfish growers and other coastal stakeholders who share an interest in healthy coastal estuaries.

Sincerely,

A handwritten signature in black ink, appearing to read "Trina Bayard", with a stylized flourish at the end.

Trina Bayard, Ph.D.
Director of Bird Conservation

Rick Jahnke, President
Admiralty Audubon Society

Sam Merrill, Conservation Chair
Black Hills Audubon Society

Diane Bachen, President
Kitsap Audubon Society

Judy Hallisey, President
Kittitas Audubon Society

Jim Castle, President
Lower Columbia Basin Audubon
Society

Pam Borso, President
North Cascades Audubon Society

Bob Phreaner, President
Olympic Peninsula Audubon
Society

Cindy Easterson, President
Pilchuck Audubon Society

Heather Gibson, President
Rainier Audubon Society

John Brosnan, Executive Director
Seattle Audubon Society

Timothy Manns,
Conservation Chair
Skagit Audubon Society

Tom Light, President
Spokane Audubon Society

Julie Burman, President
Vashon-Maury Island Audubon
Society

Sharon Gauthier, President
Whidbey Audubon Society