



Columbia River Crab Fisherman's Association

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...Serving the needs of the coastal crab fishing industry and coastal fishing communities...

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Attn: Rich Doenges

RE: **CRCFA support for Ghost Shrimp Control by imidacloprid**

The Columbia River Crab Fisherman's Association has had a long term relationship with the oyster. Oyster shell plots have long been used for required mitigation for other harmful activities that impact the crab resource like channel dredging and disposal which can be fatal to large numbers of harvestable crab.

Shell plot construction is expensive for the USACE. When burrowing shrimp are active in an area the shell sink into the mud newly churned by burrowing shrimp destroying the effectiveness of mitigation project. In addition these mitigation shell plots provide a place for natural set of oysters to occur and an oyster reef can form if the shell stays on the surface long enough further benefitting the marine environment.

Oyster farming provides similar cover for YOY crab to grow and gain size avoiding many predators at their critical and most vulnerable life stage and eventually contributing to the greater economy 3 or 4 years down the road.

Oysters are also a major contributor to improving overall water quality by filtering over abundant nutrients out of the water column that can if severe enough cause anoxic conditions. Recent NOAA investigations on marine water has shown that these conditions are especially of concern at many nearshore locations and water quality improvement gains from oyster farming is an overall plus for the marine ecology which would not be available if the oysters sink into the mud and die as a result of burrowing shrimp which MUST to be controlled.

In this particular case any ill effects of imidacloprid that may be pointed out in this public comment period will undoubtedly fall far short of the benefits that will be gained by a healthy oyster farm, not only to the oyster farmer, but the crab fishermen, the greater community, but also the overall environment as well.

The crab fishermen urge Ecology to expedite imidacloprid approval.

Thank you for seriously considering our concerns,

Dale Beasley, President **CRCFA**

11/27/2014
12 May 2018

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APPROVE IMIDACLOPRID

RE: IMIDACLOPRID = Not only NO NET LOSS in coastal estuaries = NET GAIN of Ecological Function over Ghost Shrimp infestation.

CRCFA – Columbia River Crab Fisherman’s Association is writing to you today to express our deepest concerns with Dept. of Ecology’s tentative denial of the permit application to control ghost shrimp by WGHOGA to use Imidacloprid to prevent the growing massive damage burrowing shrimp are causing to Grays Harbor and especially Willapa Bay. If the ecology current misguided decision to deny the oyster industry to protect and preserve viable oyster growing becomes final it will be extremely devastating to the ecology of these estuaries as well as to the economy of our rural coastal communities.

This decision MUST not be made for political reasons that massage the ideologies of inland NGO’s that have never set foot on these tide lands that are losing their productivity to a borrowing shrimp that is exploding in population at a rate this estuary ecology has never experienced in the past; reeking unfettered havoc on the overall structure of the small farmers dependent on an oyster productive estuary. Every year that goes by pushes the envelop of insanity of decisionmaking that has produced **NO new science** that we are aware of to reverse the positive decision of the initial imidacloprid permit issuance.

At this time CRCFA is requesting any new science that has been recently produced by any peer review process to reverse this decision for permitting IMIDACLOPRID control of burrowing Shrimp.

Oysters are not only an indispensable asset to our coastal estuaries health over all but oysters are also indispensable to our rural economy that is the 4th most Seafood Dependent community in the nation. It is well documented that shellfish beds actively increase native marina eelgrass and that burrowing shrimp actively destroy native eelgrass in these estuaries. Native eelgrass is one important piece to the puzzle of rebuilding our salmon runs. **Shellfish beds also serve as important nursery habitat for juvenile Dungeness crab, crab which the communities surrounding the coastal estuaries depend upon for our economic support.** Salmon and crab are both commercially important species not only to our rural coastal community but to our entire state. Ecology must be making well-reasoned and science-based policy decisions that work to maintain and grow habitat for these species that productive oyster beds provide, not take it away. This current decision to deny the control of burrowing shrimp will have a long term negative impact on salmon and crab survival in our local estuaries and push coastal demographics further into the ditch. This decision that does little to nothing to protect productive coastal estuarine marine waters and is overly influenced by the illicit use of Facebook and hot bottom inciting words like “neurotoxin” to enflame baseless accusations of the inflammatory rhetoric perpetuated by a less baseless permit denial.

Show us the FACTS that changed this decision from a go to a no go on this permit besides political posturing for Facebook with its inflammatory rhetoric.

The Dept. of Ecology cites concerns about impacts to juvenile Dungeness crab, yet across 32 separate field surveys the number of Dungeness crab affected by imidacloprid treatment averaged only 3.2 crab per acre, and these were small juveniles, which are extremely abundant in Willapa Bay and Grays Harbor. In addition, it is well documented that healthy shellfish beds are prime nursery and rearing grounds for this species, with crab densities many times higher than on mudflats infested with burrowing shrimp. The loss of these productive shellfish beds will have a long-term negative impact on the Dungeness crab population, which is an important part of the rural coastal economy. Tellingly, the industry experts on Dungeness crab, the Columbia River Crab Fishermen’s Association (CRCFA), has vocally supported the issuance of this permit. If you have other Facts that are contrary to the those that

support the fact that imidacloprid does more good for the bay than any minimal harm that occurs please send it to CRCFA.

In 2017 CRCFA participated in a Unanimous Washington Supreme Court Decision regarding the permits for the Oil Terminals in Grays Harbor that's primary outcome that **instructed agencies to ascertain the intent of the legislature and carry that intent out**. It is CRCFA's understanding that the legislature funded the WA State Dept. of Agriculture to utilize the monitoring funds appropriated by the legislature to conduct a proposed rigorous monitoring program under this NPDES permit. If scientific information is to inform the future of the coastal estuaries ability to control borrowing shrimp that is impossible if the permit is not issued and the intent of the legislature to fund this scientific study is not carried out it will be an arbitrary and capricious act that is an abuse of uncontrolled power by ecology driven by Facebook rhetoric that is nothing but inflammatory unsupported remarks of the ill-informed.

The only realistic way to settle this imidacloprid debate is to advance unbiased science that examines the bay for unacceptable adverse impacts to the ecological function of the bay for any long-term functional loss of productivity overall over time from repeated use of imidacloprid that a five-year renewable permit can produce. Denial of the permit without any long-term effects analysis is a dysfunctional decision that will in our strong opinion not only produce a growing burrowing shrimp problem that will become increasingly destructive to both the bay's ecology and the 4th most Seafood dependent community in the nation where emotion drives the decision not scientific reality, but also have considerable negative impacts on ecology's credibility as a scientifically driven agency.

CRCFA will continue to support the issuance of an imidacloprid permit to control borrowing shrimp that is monitored for more than minimal impacts on the bay, crab, and our industries that support our economy. Denial of the permit is an act unaccountable destruction of the rural economy of coastal communities with NO recognizable ecological gains that help either the bays or the large number of JOBS that do depend on the bays for their survival. Currently the weight of the benefits of imidacloprid far out pace the insignificant harm that may be produced from the issuance of the permit to allow borrowing shrimp control. Show Washington citizens the FACTS for denial on the scale of lady justice that will outweigh the injustice perpetrated on the rural communities that depend on producing seafood for the communities' stability and viability. Ecology's JOB is to not only protect the environment from harm which in this case is 'insignificant' by all the evidence produced, Ecology's JOB is also to protect the people that matter greatly to these 'rural' communities that have little other JOB opportunities to feed hungry families that are natural resource dependent and rely on productive bays and oceans that will be far more in harms ways from a permit denial than the bays will be from a permit approval. **Nothing in the intervening time from our first support letter to today has been presented to change our support for the issuance of the permit.**

APPROVE IMIDACLOPRID BORROWING SHRIMP CONTROL PERMIT

Deeply concerned by this protracted permit process that appears to be driven by emotional rhetoric, not science, or rational decisionmaking supported by the FACTS,

Dale Beasley, president CRCFA and CCF