

Association of Washington Business

See attached.



PO Box 658 / Olympia, WA 98507-0658 / 1414 Cherry St. SE / Olympia, WA 98501 / 360.943.1600 / awb.org

May 14, 2018

Rich Doenges
Ecology Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Re: Public comment on Washington State Department of Ecology's tentative determination to deny the NPDES aquatic pesticide permit

Dear Mr. Doenges:

Thank you for considering the Association of Washington Business' (AWB) comment on Ecology's proposal to deny a National Pollution Discharge Elimination System (NPDES) permit to control burrowing shrimp in shellfish beds using the imidacloprid pesticide. AWB is Washington's oldest and largest statewide business association and represents 7,000 business members of over 700,000 employees. AWB serves as both the state's chamber of commerce and the manufacturing and technology association.

AWB members remain strong proponents of the use of imidacloprid for control of *Neotrypaea californiensis* and *Upogebia pugettensis* since the proposal's inception. AWB members appreciate the opportunity to again support the Department of Ecology's permitting of this critical tool to protect the state's vital shellfish industry and implore Ecology to reconsider its decision to deny the NPDES permit. The permitted use of imidacloprid is an essential tool both for Washington state's economic and ecological health.

Of all global estuarine habitats, 85% of oyster reef habitat has been lost globally over the past 130 years (Lotze et al. 2006, Beck et al. 2011). Meanwhile, Grays Harbor and Pacific Counties struggle to compete with other economic regions of Washington state with the second- and third-highest unemployment percentages statewide. Supplying 25% of the nation's oyster market, the area's family-wage jobs—and the infrastructure, services and economic activity they support—are well-documented in the DSEIS. In the 2013 Northern Economics assessment, aquaculture promoted an impressive \$1.82 economic multiplier effect for every dollar spent by oyster growers, and generated nearly 3,000 jobs. The replacement cost analysis demonstrates that shellfish aquaculture can provide up to \$884,400 in ecosystem benefits in Oakland Bay which would otherwise be afforded by taxpayers or foregone altogether.

At a time when Washington state is feeling more economic diaspora between the living and working conditions of rural versus urban areas, rural natural resource development sectors—some of the only propagators of original wealth in the private sector—should be protected. In the last decade, the majority of jobs lost nationally and in Washington state where in rural natural resource extraction (Economic and Revenue Forecast Council 2017). Those remaining





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employment opportunities are defended by opportunities like an imidacloprid NPDES permit for shellfish growers.

Ecology should carefully consider the impact of its tentative denial of an NPDES permit to use imidacloprid as a tool to steward Washington state's rural economic development using imidacloprid on shellfish beds. Particularly, AWB members request that Ecology thoroughly compare its treatment of models and methods between the Supplemental Environmental Impact Statement and Final Environmental Impact Statement to the state's legal requirements to use best available science as required in RCW 36.70A.172—especially where off-site impacts have been evaluated. Statute requires that Ecology use best available science including conserved methods across trials, and the proposed denial of this NPDES permit could potentially violate those requirements.

We implore Ecology to join AWB in support of our state's shellfish producers at this critical time. Our state's productive shellfish producers have long represented a unique opportunity for shared economic progress and habitat protection. We ask that Ecology join AWB members in allowing the use of this safe, tested tool to continue that legacy.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Gary Chandler". The signature is written in a cursive, flowing style.

Gary Chandler
Vice President, Government Affairs
Association of Washington Business