



PACIFIC CONSERVATION DISTRICT
904 WEST ROBERT BUSH DRIVE
P.O. Box 336
SOUTH BEND, WA 98586
PHONE (360) 875-6735

To DOE, Director Bellon, & Mr. Doenges,

☐ The Pacific Conservation District promotes sound; volunteer conservation programs and provides technical assistance to foster a healthy relationship between people and the environment. The PCD values its relationship with its partners and cooperators, and serves as a locally led, locally driven entity to serve its constituents within Pacific County while benefiting the environment with educated and common sense alternatives. PCD serves all natural resource based groups within PCD boundaries. This is often a difficult chore and may take a tremendous amount of time and energy, but the energy spent is well worth it, creating a healthy environment and healthy communities.

PCD is very disappointed in Director Bellon's decision not to give the permit for the control of burrowing shrimp. Here are reasons:

- Ecology claims imidacloprid will harm invertebrates based on field studies in Willapa Bay. But they purposely ignore that every field trial that has been conducted met Ecology's own standards except one. They even put that conclusion in writing when previously approving the use of imidacloprid based on these same studies. To ignore past approval, and now claim harmful impacts is another appearance of biased analysis of the data.
- Ecology claims that more study is needed before the impacts of imidacloprid can be determined but fails to note that their permit denial makes it impossible to do the field studies to obtain that data. Ecology also didn't acknowledge that WGHOGA has offered to limit all treatments in 2018 to only those areas being used for scientific study, to limit the number of acres treated to the number needed to do that science, and to have a panel of scientific experts review the results of the 2018 work before any final permit is approved. To claim more science is needed, then deny the permit needed to do that science, and to ignore WGHOGA's offer to support that science has the appearance of bias in Ecology's decision to deny the permit. This should never be the case.
- Ecology claims that half of all Dungeness crab exposed to imidacloprid will be impacted. This ignores scientific studies in Ecology's FSEIS documenting, across many years of work, that this 50 percent represents, on average, only 2-3 Dungeness crab per acre that is treated. We request that Ecology staff do a fair and unbiased reassessment of this data.
- Ecology claims that areas that are not treated will still be impacted. To reach this conclusion, Ecology applied a toxicity standard based on 96 hours of exposure even though Ecology's own documents show that the proposed permit will result in at most 20-30 minutes of exposure in untreated areas. Using a 96-hour study to assess impacts over 30 minutes is bad science.
- We have also been told that when the Draft SEIS is compared to the Final SEIS that more than a hundred changes were made that alter the scientific conclusion. Where the Draft SEIS stated that the proposed permit will have localized, short-term impacts, the Final SEIS now concludes the impacts will be larger, longer, and more widely distributed. Given the critical

nature of these changes, it is imperative that the department revisit the analysis used, the science, the analysis and the public comments to ensure it can justify and defend this dramatic change of position.

- Burrowing shrimp are effectively disrupting the entire ecology of Willapa Bay and Grays Harbor because the shrimp destroy the benthos, including eelgrass habitat that support the base of the food web.

PCD believes that if there are other methods found that can control burrowing shrimp to save the ecology of Willapa Bay, we would support those methods, if proven to be effective and economical. Until this is achieved, DOE should approve the permit for controlling burrowing shrimp.

Sincerely,
Mike Nordin
Pacific Conservation District Manager