

Xerces Society for Invertebrate Conservation

Please see the attached comments from the Xerces Society for Invertebrate Conservation, supporting Ecology's tentative determination to deny the proposed permit for imidacloprid application in Willapa Bay and Grays Harbor.

May 14, 2018

Mr. Rich Doenges, Southwest Region Manager
Washington State Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7775

Comments re: Tentative determination to deny WGHOGA proposed imidacloprid discharge

Dear Mr. Doenges,

The Xerces Society for Invertebrate Conservation supports the Washington Department of Ecology's tentative determination to deny the proposed permit for imidacloprid use to control native burrowing shrimp in Willapa Bay and Grays Harbor. We strongly recommend that the denial be finalized as the science shows that aquatic use of imidacloprid is inconsistent with Washington's policy to maintain clean and healthy waterways.

Comments to the Department of Ecology (Ecology) from federal wildlife agencies as well as Xerces highlight how imidacloprid is harmful to aquatic systems, including estuarine sediment communities. We agree with Ecology that the science shows that the proposed imidacloprid use would have an adverse effect on biological resources within the sediment impact zone and that it would result in violation of sediment quality standards outside of the sediment impact zone. We are particularly concerned that the trials and post-application water testing done by Ecology showed that most of the sediment porewater and surface water samples continued to exceed the EPA's chronic marine invertebrate endpoint even 28 days after application. The trials also showed that imidacloprid was moving far beyond the application area. These results indicate that the effects of the proposed imidacloprid applications would be long-lasting and detrimental to the health of the sensitive estuarine ecosystems.

Neonicotinoids, including imidacloprid, are now recognized to have adverse impacts to both terrestrial and aquatic ecosystems. Several recent regulatory changes have been made in various jurisdictions in response to these harms. The US EPA reduced the aquatic life benchmarks for imidacloprid in late 2017, Canada has proposed phasing out most outdoor uses of imidacloprid in response to widespread water contamination, and the EU has restricted outdoor uses of three neonicotinoids. Imidacloprid use in Willapa Bay and Grays Harbor would pose unreasonable impacts to aquatic ecosystems, and Ecology should continue to deny any permit applications for its use in aquatic areas.

Thank you for considering our comments,

Sarah Hoyle
Pesticide Program Specialist

Aimee Code
Pesticide Program Director