



Friends *of the* San Juans

360.378.2319
www.sanjuans.org

P.O. Box 1344
Friday Harbor, WA 98250

May 14, 2018

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

Sent via email: burrowing.shrimp@ecy.wa.gov

RE: Ecology's tentative determination on NPDES aquatic pesticide permit

Dear Rich Doenges,
Friends of the San Juans protects and restores the San Juan Islands and the Salish Sea for people and nature. Friends of the San Juans, founded in 1979, uses science, education and advocacy to serve the local and regional community and to protect, restore, and preserve the natural resources of the Salish Sea.

Friends of the San Juans supports and encourages Ecology's denial of the Willapa-Grays Harbor Oyster Growers Association's application for a National Pollutant Discharge Elimination System (NPDES) aquatic pesticide permit for the proposed new discharge of imidacloprid to control burrowing shrimp on 500 acres of commercial shellfish beds in Willapa Bay and in Grays Harbor, Washington.

The shellfish growers' request to use neonicotinoid pesticide is too risky for Washington's environment. Friends of the San Juans agrees with the following environmental impacts that Ecology detailed as key reasons for denying the request for a permit:

- Significant, unavoidable impacts to sediment quality and benthic invertebrates.
- Negative impacts to juvenile worms and crustaceans in areas treated with imidacloprid and nearby areas covered by incoming tides.
- Negative impacts to fish and birds caused by killing sources of food and disrupting the food web.
- Concern about non-lethal impacts to invertebrates in the water column and sediment.
- A risk of impacts from imidacloprid even at low concentrations.
- Increased uncertainty about long-term, non-lethal, and cumulative impacts.

Ecology's denial of the permit would be an important precedent for all of Washington State. Friends of the San Juans supports Ecology's enforcement of the Sediment Management Standards and Clean Water Act that protect sediment and water quality.

Thank you for this opportunity to submit comments.
Sincerely,

Lovel Pratt
Marine Protection Program Director