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State Department
of Ecology (SWRO)

AWB Association of Washington Business

Washington State's Chamber of Commerce

December 8, 2014

Derek Rocket
Department of Ecology
PO Box 47775
Olympia, WA 98504-7775

RE: Use of imidacloprid for control of burrowing shrimp

Dear Mr. Rocket,

On behalf of the Association of Washington Business (AWB), thank you for the opportunity to provide comment in regard to the Willapa-Grays Harbor Oyster Growers Association's request for a permit to control burrowing shrimp with imidacloprid.

AWB is the state's oldest and largest statewide business association, which includes more than 8,300 employers representing 700,000 employees. AWB serves as both the state's chamber of commerce and the manufacturing and technology association.

As you are no doubt aware, the shellfish industry plays a critical role in our area from an economic, ecological, historical, and cultural perspective and must be allowed to protect their farmlands from these destructive pests. After several years of declining populations along the Washington Coast, for the past three years shrimp populations are once again on the increase at an alarming rate. As the shellfish industry has explained, we are already seeing impacts to shellfish beds, which elevate the need for a control tool to a critical level. Please do all you can to expedite the issuance of necessary permitting so shellfish farmers can protect these valuable commercial shellfish beds.

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The shellfish industry is an important industry that we rely on to provide economic stability to the region. This industry provides for hundreds of direct jobs, and many more indirect employment opportunities. Without an effective and reliable tool to control burrowing shrimp, we will lose the current industry for all practical purposes. The ongoing research on the issue demonstrates that shellfish beds cannot be utilized if significant populations of shrimp infest these beds.

Shellfish growers have demonstrated a high level of responsibility in working to develop an Integrated Pest Management approach, including the investigation of imidacloprid as a potential replacement for carbaryl almost 20 years ago. Shellfish growers have taken a great risk in moving to a much lower toxicity control tool, and should be commended for this massive effort. We hope Ecology and others would appreciate the risk being taken, and do what is necessary to support the growers with permit requirements that allow as much grower resource as possible to be directed toward developing imidacloprid into a tool that provides for acceptable control. This includes minimizing monitoring requirements support the spirit of its Memorandum of Agreement commitment so as not to force growers to redirect their limited resources away from development of this critical tool.

We understand that the current draft permit documents propose to prohibit treatment in the South Willapa Bay area. This area encompasses over 6,000 acres of now productive commercial shellfish beds. Many of the beds in this area have a history of requiring shrimp control in order to remain viable for shellfish cultivation, thus by prohibiting control in the area Ecology would essentially be eliminating many valuable beds from farm production. The economic impact of this prohibition will be immense and likely result in the loss of several family farms. The beds in South Willapa are essential to the overall farm needs of the various farm operations within the South Willapa. This area must remain open for treatment unless there are verifiable and documented reasons to close specific areas within the south bay. Ecology must consider the economic impact of closing this area when making it final permit decisions.

Research has documented that shellfish beds provide some of the best overall habitat for an array of species. These beds provide three dimensional habitat that is of equal or greater value than any other habitat in the estuary. The actions of

shellfish growers to invest their resources in the protection of this habitat goes well beyond the needs of their farm and acts to provide a public benefit. Many other species, including highly valuable commercial species, enjoy the benefit provided by the grower's actions to control shrimp. In comparison, ground infested with burrowing shrimp is severely degraded in regard to natural species diversity and provides little actual habitat value. In addition, it has been documented that shellfish act to sequester carbon, to filter water so as to reduce turbidity, etc. This greatly reduces the need for public funds to be used to provide these water quality services. The state needs to consider these documented ecological and fiscal public services and not overburden the industry with monitoring requirements beyond what is absolutely necessary. Given the eco services provided, the state should absorb cost for monitoring it chooses to impose so that shellfish growers can focus their limited resources on developing an effective IPM tool. The development of this tool will take many years of dedicated and expensive effort, and the shellfish community must be allowed to focus their resources on this effort.

Thank you for the opportunity to provide comment on this important issue. We again encourage you to expedite issuance of this permit, and to not overburden shellfish growers with any unnecessary costs around permit maintenance.

Sincerely,

Kris Johnson
President