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Subject: comments from Fritzi Cohen on proposed NPDES permits.
Date: Sunday, November 30, 2014 11:05:23 AM
Attachments: [Comment on NPDES proposed permit.pdf](#)

Comments of Fritzi Cohen re proposed NPDES permit for imadicloprid and the associated Sediment Impact Zone application.

I am totally opposed to this permit application and am in agreement with those critics who find both permits to be unsupported by scientific evidence. The entire history of pesticide use in Willapa Bay and Grays Harbor has involved projects both state and industry sponsored whose impact on the ecosystem, and water quality have never been responsibly studied. Furthermore much of the financial burden has been on taxpayers. In this regard I am concerned that the costs of obtaining these industry sponsored permits are again going to be passed on to the taxpayers.

The Fact Sheet omits any reference to what developing and issuing the permit costs, and who will pay. Historically the industry has always managed a reduced rate. As has been pointed out when Ecology developed the first NPDES permit in 2003 for carbaryl it estimated that the cost would be \$50,000, to be paid by the permittee.

I am requesting the information regarding the costs of past permits granted to the aquaculture industry and what the growers have paid. If an exemption regarding paying actual cost was determined I am asking that that information be provided, i.e. as to any legislation or policy that was developed to subsidize this permitting process.

I am attaching below as part of my comments an investigative report that appeared on Link-TV.

NEW "EARTH FOCUS" LOOKS AT RISK TO FOOD CHAIN

Burbank, Calif. – October 14, 2014 – The world's most widely used and fastest growing class of insecticides – neonicotinoids – long linked to the decline of honeybees in the United States are also toxic to a wide range of animals including terrestrial and aquatic invertebrates, marine life and birds, according to a growing number of scientists.

KCETLink presents "Neonicotinoids: The New DDT?," a compelling EARTH FOCUS investigation that explores the science and controversy behind these popular pesticides. The new episode premieres Wednesday, October 22 at 8:30 p.m. Pacific time on KCET (Southern California) and nationally on Thursday, October 23 at 9:00 p.m. Eastern (6:00 p.m. Pacific) on Link TV (DIRECTV 375, DISH Network 9410).

A growing body of research is exposing the harmful effects of neonicotinoids on animal life. In rats and mice, neonicotinoids are linked to liver cancer and abnormal brain development. They are shown to affect the tunneling behavior and sperm quality of earthworms. Bumblebee nests treated with neonicotinoids produce 85% fewer new queens than healthy nests. Minute amounts of the neonicotinoid imidacloprid cause genetic and reproductive damage in sea urchins. "It means there is a direct threat to the reproductive fitness of the entire biodiversity of marine environments," says Dr. Craig Downs of the Haereticus Environmental Laboratory in Virginia.

"The main concern is that they have such a high toxicity to a broad range of invertebrates terrestrial and aquatic," notes Dr. Pierre Mineau, principal scientist at Pierre Mineau Consulting in Canada. "They are extremely persistent and mobile. And you put these three conditions together and you are talking about removal of a large segment of the invertebrate community." And that means less food for fish, birds, amphibians, reptiles and many other animals with an effect cascading throughout the entire ecosystem. According to Scott Hoffman Black, Executive Director of The Xerces Society, "we are killing the underpinning of the food chain," through the widespread use of these insecticides.

Neonicotinoid insecticides are used on some 200 million acres of US cropland – on almost all corn, canola, and half of all soybean crops as well as many fruits and vegetables. They are widely applied as

seed treatments in agriculture and used in many home and garden products. Manufacturers argue that their pest fighting power is indispensable to food production. They are systemic—absorbed by the plant making all parts of the plant including nectar and pollen toxic to pests.

Neonicotinoids were introduced in the 1990s to replace more damaging insecticides. The U.S. Environmental Protection Agency approved the neonicotinoid imidacloprid for use in the U.S. in 1994 even though the Agency's scientists knew at that time that the pesticide was highly toxic to songbirds, aquatic invertebrates and honeybees.

“We are witnessing a threat to the productivity of our natural and farmed environment equivalent to that posed by organophosphates or DDT,” says Dr. Jean Marc Bonmatin, lead author of an analysis of 800 peer reviewed reports on the risk of neonicotinoids (and the systemic pesticide fipronil) completed in October 2014 by the Task Force on Systemic Pesticides, a group of independent scientists from 15 countries. DDT was widely promoted for pest control in the US after World War II but was banned in 1972 over both environmental and human health concerns.

The U.S. Environmental Protection Agency will re-evaluate the use of neonicotinoids as part of its registration review – a process that may take till 2018 or longer to complete.

EARTH FOCUS is weekly half-hour program that is the longest-running environmental series on U.S. television. The series features investigative reports on the state of our planet's environment and its impact on people around the world. Funding for EARTH FOCUS is provided by grants from the Wallace Genetic Foundation, the Orange County Community Foundation and individual donors.

For more information about EARTH FOCUS and to watch episodes online, visit:
www.linktv.org/earthfocus or www.kcet.org/earth_focus.

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