

**From:** [Margaret Barrette](#)  
**To:** [Rockett, Derek \(ECY\)](#)  
**Subject:** comments - scoping for commercial shellfish beds  
**Date:** Thursday, February 13, 2014 10:11:55 AM  
**Attachments:** [Shrimp\\_EISscoping\\_021214.pdf](#)  
**Importance:** High

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Attached, are comments from the Pacific Coast Shellfish Growers Association regarding the determination of significance and scoping for the Proposed Use of Imidacloprid on Commercial Shellfish Beds in Willapa Bay and Grays Harbor. Please let me know immediately if you have issues accessing the file.

Thank you for the opportunity to provide comment. If you have questions or need additional information, please contact me directly.

**Margaret Pilaro Barrette**

Executive Director

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February 13, 2014

Mr. Derek Rockett, Permit Writer  
Department of Ecology, Southwest Regional Office  
PO Box 47775  
Olympia, WA 98504-7775  
Via E-mail – [Derek.rockett@ecy.wa.gov](mailto:Derek.rockett@ecy.wa.gov)



Dear Mr. Rockett,

The Pacific Coast Shellfish Growers Association (PCSGA) was founded in 1930 to represent the interests of shellfish growers in the states of Washington, Alaska, Oregon, California, and Hawaii. PCSGA works on behalf of its members on a broad spectrum of issues, including environmental protection, shellfish safety, regulations, technology, and marketing. Washington members grow a wide variety of healthy, sustainable shellfish including oysters, clams, mussels, and geoduck. Our members within the Willapa Bay and Grays Harbor area continue to deal with burrowing shrimp which impact their commercial shellfish operations and make them unproductive.

Because of the burrowing shrimp concerns, PCSGA appreciates the opportunity to comment on the Determination of Significance (DS) and the Scope of an Environmental Impact Statement (EIS) for the proposed use of Imidacloprid on Commercial Shellfish Beds in Willapa Bay and Grays Harbor. I understand that these comments will be used by Ecology to help identify the significant environmental issues that will aid in the identification of alternatives and be considered as part of the EIS. As Ecology defines the scope of the EIS, PCSGA respectfully request the inclusion the following:

- Best Available Science which demonstrates that controlling burrowing shrimp provides a benefit to the estuary in that it allows marine species to function and provide valuable ecological services.
- Economic review as related to each proposed alternative, including the no-action alternative. This analysis should include the direct impact to the shellfish industry, the indirect impact to the economic long term health of coastal communities, and the impact to the social contribution of shellfish farmers to the local community and the state. The economic review should assume that without the ability to control shrimp, the current shellfish industry within Grays Harbor and Willapa Bay would disappear over time.
- A thorough review of the no-action alternative including how it would likely result in the elimination of valuable, functioning habitat.
- A review of how each alternative aligns with:
  - State and federal agricultural pest control polices;
  - Federal seafood production goals;
  - The intent of the Washington State Shellfish Initiative and the National Shellfish Initiative; and
  - Washington State law, which recognizes the beneficial use of state waters for shellfish.

Thank you again for allowing PCSGA to offer input on the scope of the EIS. As the development of the EIS progresses, please let me know if the shellfish community can be of any assistance.

Respectfully,

A handwritten signature in black ink, appearing to read 'Margaret P. Barrette', is written over a light blue horizontal line.

Margaret P. Barrette  
Executive Director