

From: [Brian Sheldon](#)
To: [Rockett, Derek \(ECY\)](#)
Subject: Comments on shrimp scoping notice
Date: Friday, February 14, 2014 12:33:39 PM
Attachments: [2-14-14 NOC Scoping Notice Comments.pdf](#)

Hello Derek,

Please accept the attached as my comment on the EIS scoping notice. Please also let me know that you received these.

Thanks,
Brian Sheldon

February 14, 2014

Derek Rockett, Permit Writer
Department of Ecology
Southwest Regional Office
PO Box 47775
Olympia, WA 98504-7775

Dear Derek,

I appreciate the opportunity to provide comments on the scoping of the draft environmental impact statement for the use of Imidacloprid on Commercial Shellfish Beds in Willapa Bay and Grays Harbor. I want to note that work to develop imidacloprid into an effective pest management tool began in 1996, or about 20 years ago, and a federal registration for this use was granted in June of 2013. It is imperative to the survival of shellfish farms in Willapa Bay and Grays Harbor that this application be given high priority by Ecology to assure growers are able to have an uninterrupted ability to protect their farmlands and crops.

Willapa Bay is the largest single producer of cultivated oysters in the United States, and in Washington state. About 65% of the oysters in Washington come from Willapa Bay, where oysters were the first agricultural export from the state in 1849. In Pacific County this industry is the largest private employer, and most farms are owned and operated by families who have been engaged in shellfish farming for up to five generations. Many families, such as our own, are raising what we hope to be the next generation who will shepherd our farms with the same sustainable farming values our predecessors passed on to us. Our 165 year farming history in Willapa has shown shellfish farmers the critical importance of protecting not only our direct farm lands, but that we rely on the health of Willapa and its surrounding lands in order to sustain our farms. This basic principle essentially makes it a requirement that all growers participate in activities well beyond our farm land boundaries in order to assure long term and sustainable policies are in place to protect our basic farming need of a healthy estuary. Our long term work in monitoring and controlling problematic and invasive species is exceeded by no other group, and this work has translated to great protection of the estuary and surrounding marine areas. I often wonder what the health of the global environment would be if all of us relied on the health of the environment as a basic operating parameter. For shellfish farmers there are a multitude of basic operating requirements that are tied directly to clean and healthy water which we rely on in order to grow and harvest our crops. The saying that "shellfish are the canary in the coal mine" for the marine environment has been demonstrated to be true many times. Shellfish growers continuously monitor this health, and thus when problems arise we are often the first to respond and bring attention to the issue. It's also a fact that shellfish provide an array of ecological services that benefit many species, including humans. The economic contribution of shellfish farms goes well beyond the simple local benefits that help sustain many rural communities. These benefits include contributions that benefit the public

through water filtration to maintain water clarity, and carbon sequestration, just to name a few.

Unlike any other state, shellfish farmers in Washington own most of the property on which they farm. This unique situation has resulted in the most successful and sustainable farm community in the US based on the simple fact that shellfish growers here must actively work to assure their shellfish beds remain productive. To accomplish this requires a grower to be extremely sensitive to the condition of the beds, and to utilize cultivation and harvest methods that result in the lightest touch to the environment. This "lightest touch" approach has been a cornerstone of not only our general farming practices, but also of our pest management efforts. We have studied literally hundreds of pest control strategies, and consistently focused on taking the approach that results in the least foot print on the environment.

With the ownership of our marine farms lands in Washington comes the responsibility and implied right to farm these lands. We are required to continue to farm these lands, and must act to assure they remain suitable for that purpose. Like any form of agriculture, shellfish growers must have the ability to address pest and predator problems so as to not only protect our planted crops, but to also assure our lands remain suitable for growing shellfish. Assuring our need to control pests is considered like any other form of agriculture is an integral part of this permitting action from a practical and legal perspective.

Like any farm, shellfish farms require an ability to implement pest management strategies so as to protect the crop. Because shellfish beds are demonstrated to provide such valuable habitat for many species, in protecting these beds we are providing and protecting habitat essential for these other species. It has been documented through years of research as well as real world conditions that shellfish beds provide the most valuable habitat resource for other species including fish, sea grass, crab, and other critical species. In comparison, areas infested with burrowing shrimp provide almost no beneficial habitat for species other than burrowing shrimp. In fact , as burrowing shrimp populations expand and increases in density, habitat diversity is reduced and eventually eliminated. This makes shellfish beds even more important in regard to sustaining ecological balance by providing a haven for many species relying on this diversity.

In order to assure an accurate assessment is completed during the EIS drafting process, I believe the following areas will need to be included in the scope of the EIS:

- 1) Considering the critical importance of retaining the long term health of Pacific and Grays Harbor's economy, it will be important to include a review of the best existing information related to the economic impact of shellfish farming. This review would be used to document the impact of implementing each of the potential control alternatives.

- 2) Burrowing shrimp control has a long history in Willapa Bay and Grays Harbor. Since the early 1950s, or about 63 years ago, there has been ongoing work to develop Integrated Pest Management (IPM) strategies. This work was occurring even before IPM was identified as a method to pursue coordinated pest management strategies. A summary of this valuable work must be included in the EIS. This existing information must be used to evaluate the effectiveness of selecting one control alternative over another such that acceptable control efficacy is achieved at a scale aligned with normal commercial agricultural pest control practices.
- 3) State policies such as the beneficial use of state waters, state and federal shellfish initiatives, etc. support shellfish farming as a benefit to the state of Washington. Alignment of state policy, including agricultural pest control policy, should be considered for each alternative.
- 4) The national aquaculture goals around seafood production in the United States call for a significant contribution from shellfish aquaculture in order to meet stated goals. Control alternatives should be assessed in consideration of how they allow shellfish farmers to support the goals of the stated federal aquaculture production goals.
- 5) Control activities take place only within the confines of the tidelands, and only on shellfish beds under the direct management of members of the Willapa - Grays Harbor Oyster Grower Association (WGHOGA). The EIS, as a risk management tool, should only consider impacts that occur on these specific lands. In considering any offsite impacts, there needs to be some threshold identified in the scoping notice where the impact of the control alternative is shown to have a likelihood of having a significant impact that is likely to occur based on the actual use pattern.
- 6) Based on historic observations, it appears that burrowing shrimp larval recruitment occurs in a cyclic fashion likely tied to environmental cycles. Shrimp monitoring data for the past several years demonstrate that shrimp larva are now recruiting in very large numbers. This has made it critical that an effective shrimp control program be implemented immediately so as to protect shellfish beds and the crops that are planted. This state permit has been under development for several years. The delay to issue this permit has created a great urgency, along with an extensive set of new data supporting not only the control of burrowing shrimp as a benefit to overall estuary health, but to the specific use of imidacloprid for the intended purpose. The hundreds of existing scientific documents that support the control of burrowing shrimp along with those supporting the use of imidacloprid for this use should be considered the complete Best Available Science (BAS) data set in development of the EIS and permit. The permit

issuance should proceed based on this BAS, with future information being considered in future permit cycles.

7) Considering that there is a "no action" alternative included in the scoping notice, there needs to be an assessment based on existing BAS of the long term impact of losing the shellfish farming industry from Pacific and Grays Harbor Counties. This assessment should include not only the direct economic impact, but also the indirect economic consequences. A summary of the social impacts should be included that considers the many roles shellfish grower families and employees play in the community service arena that would be eliminated if the industry were removed. The summary should include an overview of the public benefits that shellfish growers provide through their voluntary work in land use and other policy development around protecting shellfish growing areas.

8) Shellfish growers act to protect a good amount of the near shore upland areas thereby keeping these areas mostly undeveloped. With the no action alternative these upland areas would likely be made available for home or other shoreline development. An assessment should be completed to consider the long term impact of converting undeveloped uplands to developed uplands as this is the likely future if there is a no action, or if an ineffective action alternative implemented. Increased shoreline development is a known cause of estuary collapse across the US, so some level of an assessment should be compiled based on BAS to consider this likely land conversion impact.

9) BAS has demonstrated that if burrowing shrimp are not controlled, shellfish beds will be eliminated along with the services they provide. An assessment of the ecological services that would be lost should be completed based on BAS and real world anecdotal data where this has occurred.

10) It has been demonstrated by BAS and observed that shellfish beds provide and support essential fish habitat (EFH) which by law is to be protected. An assessment should be included to predict the overall loss of EFH that will occur if Burrowing shrimp are not controlled, and are allowed to turn now protected areas into more monoculture areas that only support shrimp.

Again, I appreciate the opportunity to provide comment on this important issue.

Sincerely,



Brian Sheldon