

NISBET OYSTER CO., INC.

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October 30, 2017

Derek Rockett
Ecology Water Quality Program
P.O. Box 47775
Olympia, WA 98504-7775
Via email: burrowingshrimp@ecy.wa.gov

Dear Derek,

Re: Support for Draft Supplemental Environmental Impact Statement (Draft SEIS) for Control of Burrowing Shrimp using Imidacloprid on Commercial Oyster and Clam Beds in Willapa Bay and Grays Harbor "

On behalf of Nisbet Oyster Co., Inc., I am pleased to submit comments in support of the Draft Supplemental Environmental Impact Statement (Draft SEIS) for Control of Burrowing Shrimp using Imidacloprid on Commercial Oyster and Clam Beds in Willapa Bay and Grays Harbor, Washington issued by the Washington Department of Ecology for public comment on September 15, 2017. We support the of issuance of a National Pollution Discharge Elimination Permit ("NPDES") as analyzed in the preferred alternative of the Draft SEIS and offer these comments in addition to those submitted through the Willapa Grays Harbor Oyster Growers Association.

Nisbet Oyster Co. is a family run oyster farm based out of Willapa Bay WA since 1975. We farm on approximately 1900 acres of privately owned Bush-Callow Act oyster tidelands that have been in production since the 1800's, using extensive, natural and traditional low impact, bottom culture techniques. We also process farmed products for nine other farming companies in the Bay. We are very proud of the products that we produce and the ecological quality of the estuary that we operate in.

During the decades that we have been operating day in and day out in the bay, we have witnessed first hand the infestation of burrowing shrimp and the significant ecological changes that these species effect in the estuary beyond just the loss of our crops. We have been a participating member of WGHOGA, prior carbaryl control programs, and have supported scientific research to assess the effectiveness of pest control and our continuing search for alternatives. We have successfully restored previously abandoned tidelands where high densities of shrimp had created muddy barrens of low diversity into productive eelgrass beds that support the bottom culture of oysters and associated marine invertebrates, fish and waterfowl that use the bay.

We are very proud to be creating high quality local food in partnership with nature. Our family farm is now entering its third generation of farmers making us one of the "younger" farms in the bay. Our operations now directly support more than 100 employees and their families with family wage jobs as well as contributing to the health of our local coastal communities with secondary economic contributions.

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We, with our fellow oyster farmers have had an active role in managing the bay from anthropogenic threats such as sewage pollution, excess run-off, invasive *Spartina* and burrowing shrimp. Willapa Bay has been anthropogenically changed through reductions in the Columbia River freshet and loss of predators which we believe kept burrowing shrimp in ecological balance, as well as decades of clear cut logging which resulted in increased sedimentation into the bay. Active participation in bay management and preservation has allowed our industry to be the largest employer in the county while maintaining a healthy environment. We do this against a backdrop of issues that we cannot control, such as anthropogenic climate change and ocean acidification. We are the stewards of our environment with respect to water quality and pollution and our oyster culture provides important environmental services.

During the last year, we have been forced to abandon more than 80 acres of our best growing areas due to extraordinarily high levels of shrimp recruitment which have resulted in the loss of stable eelgrass oyster complexes to soft mud barrens that are even dangerous for our crews to walk in. We are monitoring increases in shrimp on other previously healthy beds and are aware that continued progression left unchecked will result in loss of our crops, our business, our employees well being and ultimately the ecology of the bay.

We recognize that as stewards of the estuary and as providers of high quality food to our customers, that we have a responsibility to ensure that management of our beds is done in the most scientifically defensible and responsible manner that does not pass on any real or perception of risk to our customers, while ensuring that non-target impacts are within acceptable levels for the ecology of the bay. We are confident that the application of imidacloprid as outlined in the Draft SEIS will meet these objectives while we continue to further research the cause of the increased shrimp infestation and explore alternatives that will allow us to maintain our beds while continually minimizing impacts through the continual improvement framework of integrated pest management. The alternative of no treatment, will result in significant business and community hardships and disallow us from seeking out future alternatives.

The findings of the SEIS support the issuance of a draft permit for the use of Imidacloprid to control burrowing shrimp in Willapa Bay and Grays Harbor. There has been appropriate analysis and sufficient evidence to support the alternative (previously called "Alternative Four") within the SEIS, which allows IPM on up to 500 acres per year in Willapa Bay and Grays Harbor with no aerial applications by helicopter and no applications over oyster crops. This alternative, which is smaller in scope and different in method from the 2015 SEPA process, reflects best available science and a refined scope. The proposed mitigation measures and monitoring proposed will adequately offset the potential impacts and provide information for future refinements.

We encourage the Department of Ecology to support the alternative and continue with the process towards issuance of a draft permit. We appreciate the efforts that the Department of Ecology has made to engage coastal stakeholders and the review of the science that has guided this process. We will look forward to a mutually satisfactory path to a permit and working together to ensure that everyone's objectives are met and that the oyster industry in Willapa Bay and Grays Harbor will continue to be successful.

Sincerely



David H. Nisbet
Owner