

## Bill Yake

Without a fundamental change in approach, oyster culture in these areas -- Willapa Bay and Grays Harbor – they will forever remain "estuaries on drugs". 'Drugs' that indiscriminately kill native invertebrates. It's necessary to understand and reestablish the fundamental ecological structure of these waterbodies if we're ever going to have healthy aquaculture there. The EIS should advance this approach. There is a considerable body of knowledge that suggests that the bump in burrowing shrimp populations is largely due to the demise of eelgrass – and the influx of, and subsequent eradication efforts towards, Spartina. It's also likely that increases sedimentation in these watersheds – largely from poor forestry practices – plays an important role. Work should be focused on these sorts of fundamental disruptions in the ecological balance of the estuaries and their watersheds. This draft largely ignores this aspect of the problem – and, therefore, cannot solve the problem in a sound, integral, and ethical way.