

David Beugli

(Email Submission - See Attached PDF)

Derek,
Thanks for all you hard work.
David

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Thank you for providing an opportunity to comment on this new Supplemental Environmental Impact Statement for the control of burrowing shrimp using imidacloprid.

The Willapa Grays Harbor Oyster Growers Association was founded in 1959 as a way for shellfish farmers to work together to solve common problems. Current membership includes about 20 farms located in Willapa Bay and Grays Harbor. The majority of these farms are family owned and have been farmed by the same families for multiple generations. The shellfish industry is the single largest private employer in Pacific County responsible for nearly 2000 family wage jobs. This represents over 100 million dollars in economic output on a yearly basis. In addition, Willapa Bay and Grays Harbor represent the largest oyster growing areas in the US producing nearly 25% of the nation's oysters.

The new permit represents a significant reduction in acres where burrowing shrimp will be controlled from 2000 acres per year in the originally issued permit, to the current request of 500 acres. This represents a 75% reduction in the total acres that would be treated on a yearly basis. We have also committed to not using helicopters but focusing on more precise ground based applications. These focused ground based applications will result in less acres being treated annually and reduce the need for imidacloprid.

This new SEIS just like the previous FEIS demonstrates that there will be **no bay-wide impacts** and that these applications will have **no direct impacts to fish, birds, marine mammals or human health**.

These findings alone support the timely issuance of a new permit.

Thank you again for the opportunity to provide comment on this important issue.

David Beugli