Brady's Oysters Inc.

Thank you for the opportunity to comment on this important issue. I am and have been the Oyster grower/farmer for Brady's Oysters Inc.for 24 years. Brady's Oyster's has been in business for 47 years and have never had the luxury of knowing there was going to be a tool for dealing with this problem at our disposal. This has been a constant question mark almost every year, even with a permit. I have witnessed the explosion of the burrowing shrimp populations on our oyster beds the past 2/3 years without any ability to do anything about it. We have spent huge amounts of money trying to work our way through the permitting process. The oyster growers are running out of time on this issue as crops and usable land are being lost to the shrimp. I have heard some say that you just need to use alternate culturing methods like long lines or suspended culture, but these are not solutions as these methods also will sink in a soupy substrate or can't be planted at all because is too hard to work in sinking mud. We need some tools in our tool box to deal with this problem. The Oyster growers have been done a dis-service by DOE by a constant moving of the bar. In the original Carbaryl agreement to stop using that product to treat the shrimp our counterparts agreed to help (not hinder) to find a new solution for the problem. I have never known this to be true, the more we have tried the more difficult it has become and you at DOE are a party to that behavior. I find it difficult to believe that DOE has less problem with the Army Corps of Engineers digging a giant channel through the middle of Grays Harbor that affects many more acres and disrupts bottom fish, kills Eel Grass and who knows what other detrimental impacts the dumping of dredge spoils has outside the bay. DOE owes the oyster growers of Washington a clearly defined path to a permit, please set the parameters of expectations and stick to them. The Oyster growers have approached this burrowing shrimp problem with the integrity of science and cooperation, help us get control of this problem by putting forth an achievable plan. Thank you, Mark Ballo, Farm Manager, Brady;s Oysters Inc.