From: Brady Engvall
To: ECY RE Shoreline Rule;
cc: Margaret P. Barrette;
Subject: Comments: WAC 173-26 Proposed Rule Amendment E0018
Date: Monday, November 22, 2010 12:03:41 PM

Dear Ms. Bouta,
I would like to respond to the proposed rule changes as it will effect Grays Harbor shellfish growers if implemented. It is troubling that the new rules would eliminate important water quality protections for the shellfish growers and depart from Ecology's current policy. These two items have been the foundation for our continuing struggle to keep Grays Harbor safe and productive for shellfish as well as other fisheries. We have always thought of the Department of Ecology as our partner.

Over the last fifteen years the growers have joined forces with important local environmental groups to further the concept of clean water equals lasting jobs and that a clean environment is beneficial to a sustainable economy. These groups are Friends of Grays Harbor, Wildlife Forever, Surf Rider and independent citizens at large.
These groups using their own time, money and energy have succeeded in improving environmental conditions for the Stafford Creek Correctional Center; helped redesign the Links at Half Moon Bay to be more environmentally acceptable: challenged wetland degregation for a condo complex in Grayland; helped GH county develop a good Critical Area Ordinance; redesign of the Cohassett Beach shoreline development and many more issues too numerous to mention. Most of these saw considerable court expense. All these activities were in support of the long term survival of shellfish production, commercial fishing, sport fishing and the general welfare of our community.

Another troubling aspect of the new rules is the reopening of the Cosmopolis Pulp Mill. Over a long history when Weyerhaeuser ran the mill we had an ongoing problem with shellfish closures due to fecal contamination of the harbor. Each time we were closed a week or at times two weeks for the bay to clean up. The worst was in 1995 when we were closed five times that year. It was really hard on business. The new owners of the mill are scheduled to reopen this spring. They are proposing a expanded process that, in our estimation, will surely be more troublesome than Weyerhaeuser as "W" really tried to do the right thing by the growers. It is just a terrible process that is hard to control at its source. Old mill, antiquated process and new out of state ownership spells trouble. If you proceed with the new rules we will have lost our very argument for clean water and a clean environment.

For Grays Harbor it is " critical saltwater habitat" and is not a shoreline issue as

we provide juvenile habitat for many species that are tied to the ocean such as dungeness crab, english sole, salmon and other related species. If we protect the shellfish beds we also protect these other important species.

Tomorrow Brady's Oysters will be pouring cement foundations for a new shellfish processing plant. This is a very expensive building designed under the Department of Health (shell fish division) rules and has but only one purpose and that is processing oysters. It is not a flexible design and without shellfish to process it is useless. That's what we are thinking about.

Each year Brady's Oysters has a clean water oyster eating event in September at our establishment. The theme is clean water and a healthy environment. We host the public and have a great time making our case for the future of a healthy environment. Citizens love it! Our future is really in your hands Treat us fairly.

Brady Engvall (shellfish grower -retired)
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P.S. The Willapa - For the growers and residents of Willapa Bay shellfish and fair shoreline rules are the economy of the area. When all other types of employment go down on the Willapa there is always and has always been shellfish to depend on. That's the way it is today!