



November 24, 2008

Department of the Army
Norfolk District, Corps of Engineers
Attn: Mr. Mark Mansfield
Chief, Planning and Policy Branch
803 Front Street
Norfolk, VA 23510-1096

Dear Mr. Mansfield,

Thank you for inviting public comment on your recently released Draft Environmental Impact Statement for Oyster Restoration in the Chesapeake Bay including the use of native (*Crassostrea virginica*) and non-native (*Crassostrea ariakensis*) oysters. Lynn Haven River NOW sends this letter to offer our strong support for increased oyster restoration and aquaculture activities in the Chesapeake Bay using native *Crassostrea virginica* oysters only (similar to your alternative 8A).

Restoration of the native *Crassostrea virginica* oyster in the Lynn Haven River is one of Lynn Haven River NOW's highest priorities. Over the last 10 years, thousands of students and citizens have worked together with non-profits and governmental organizations to build oyster reefs in the Lynn Haven and to stock millions of reproductive native oysters to the reefs. After only a decade of restoration activities, we have seen that the effort is clearly working! Ten years ago, the Lynn Haven's oyster population was estimated to be at 1% of historic abundance, and recent calculations estimate that we may have already increased the Lynn Haven's population to as much as 10% of historic abundance. That is a 10-fold increase in 10 years. This rebound is astounding, and it is occurring with native *Crassostrea virginica* oysters despite very high disease pressure from both Dermo and MSX diseases in the Lynn Haven River.

The Lynn Haven's remarkable oyster rebound is to the credit of a great community synergy between the federal government, the state, the City, scientists, managers, industry, non-profits and thousands of committed, engaged citizens who are working to see the legendary Lynn Haven oyster restored. The native oyster recovery is a source of great pride in this region, and our progress is a model for other sub-estuaries around the Chesapeake to demonstrate the potential for native oyster restoration. **Lynn Haven River NOW wants to see the scale of native oyster restoration increased in the Chesapeake Bay** for the benefit of the burgeoning oyster population in the Lynn Haven, and for the benefit of other rivers and other regions who aim to replicate the Lynn Haven's oyster restoration progress.

Lynnhaven River NOW is supportive of native oyster harvest via aquaculture, because we feel that aquaculture is a sustainable technique for harvesting and selling oysters for public consumption, plus we appreciate that aquaculture-raised oysters filter the Lynnhaven while they are feeding in the river. We work closely with many of the active oyster aquaculturalists in the Lynnhaven, who join us at our quarterly Oyster Restoration Committee meetings, and we have developed our position regarding the non-native *Crassostrea ariakensis* oyster with their input.

Lynnhaven River NOW opposes the introduction of *Crassostrea ariakensis* to the Chesapeake Bay, either as diploid reproductive animals or as triploid aquacultured animals that would eventually become an introduced species. The introduction of *Crassostrea ariakensis* poses tremendous risk to our burgeoning native oyster population in the Lynnhaven River without providing *any* dependable benefit. We are concerned about two likely occurrences should this species be introduced:

1. We are concerned that *C. ariakensis* will interfere with our native oyster's successful reproduction, serving as a 'gamete sink' that will undermine the foundation for the exciting oyster restoration progress that is underway in the Lynnhaven.
2. We are concerned that *C. ariakensis* will increase oyster disease risks to our existing native oysters by bringing pressure from an oyster disease, *Bonamia*, into our system, which is not currently causing extensive oyster mortality.

Furthermore, we believe that our native oyster, *Crassostrea virginica*, is actually better suited to our ecosystem than *C. ariakensis* for the following reasons:

1. *C. ariakensis* is more susceptible to low dissolved oxygen events than is *C. virginica*, and according to the most recent DEQ 303d Report, 90% of the Lynnhaven is considered impaired for dissolved oxygen.
2. One of the commercial growers in the Lynnhaven who has participated in the Virginia Seafood Council study recently reported to us that he has found the native *C. virginica* oyster to be superior to *C. ariakensis*.
3. *C. ariakensis* harbors human pathogens more so than our native oyster, posing greater risk for human consumption.
4. *C. ariakensis* is more susceptible than our native oyster to several oyster predators that we have in the Lynnhaven, including polydora worms, which decrease the desirability of oysters for market.

Thank you for your consideration of our position, and we can be reached at (757)-962-5398 for additional comment if necessary.

Sincerely,



Laurie Carroll Sorabella
Assistant Director & Marine Scientist