April 10, 2008

Kathryn Townsend
7700 Earling St. NE
Olympia, Washington 98506

Kathryn:

In your March email you asked me for documentation from our scientists regarding the Department's determination that there is minimal interaction between geoduck aquaculture methods and forage fish. You and I have exchanged emails previously about this subject. You asked for a specific document that identifies the scientists that made that determination and the specific documents on which they made the determination. I have given you all of the records that we have to date regarding this subject. Under the Public Records Act we do not create new records in response to records requests so I can not fulfill your request for a formal statement from the scientists.

Two of the Department's aquatic scientists reviewed the WDFW website information and based on their training and best professional judgment determined that the interaction is minimal. We do not have specific scientific studies that address the interaction of geoduck aquaculture methods and forage fish.

The Best Management Practices that the Department has developed for the aquaculture program are designed to be protective and to address a range of conditions and situations. Please refer to BMPs 3.11 and 5.11 as noted below:

> 3.11. No seeding, culture or other operations are done in biologically sensitive areas of the beach such as herring or smelt spawning grounds.

> 5.11. Time harvest to avoid spawning and incubation periods for sand lance, surf smelt, and herring if they are documented by WDFW to occur in the farm area.

As we learn more specific information on the subject of interaction, the BMPs will be amended—potential additions are leasehold spawn surveys and clarifying BMP 5.11 so that harvest does not occur in sediment that has incubating eggs. The process of the ongoing Shellfish Aquaculture Regulatory Committee (SARC), on which the Department sits as a member, is helping us gain additional knowledge from the best professional judgment of other scientists, which will help us adaptively manage the BMPs.

Thank you,

Peggy Murphy
Asset Management & Protection Division

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