

WASHINGTON COUNCIL OF TROUT UNLIMITED
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COUNCIL RESOLUTION 06-1: Aquaculture Management (November 2006)

The Washington Council of Trout Unlimited finds that recent advances in the cultivation of Geoducks in Puget Sound's near-shore environment has created distress among landowners and the environmental community over the potential environmental and observed social impacts of such activity.

Despite landowner requests and the advice of other environmental interests, the State Department of Natural resources has declined to perform a Programmatic Environmental Impact Study to determine the long-term effects of such activity, declaring it unnecessary. The agency instead intends, through adaptive management, to correct any harm observed *only after it has been discovered*.

The Department's own Geoduck Management Plan, designed to manage and regulate deep-water Geoduck Harvest requires environmental assessments prior to leasing deepwater public lands for commercial Geoduck harvest, however, no such requirement has been established in agency guidance for near-shore leasing. Therefore, counties surrounding Puget Sound have no precedent established by the State to guide their near-shore permitting decisions for such activity on private lands.

The State Environmental Protection Act requires assessments for social, economic and environmental impacts prior to commencing such operations and/or granting leases for such purposes. *(An environmental impact statement may be required if there are probable Significant environmental impacts. (Ref: RCW 43.21.C, WAC 197-11, State Environmental Policy Act).*

Further, SEPA requires proof the proposed facility *will not* have significant adverse *environmental and social* impacts through completion of an environmental checklist prior to state or local approval

The scientific research to determine the long-term impacts of such activity is lacking and no formal peer reviewed studies have been completed. While there have been limited studies conducted by the Industry and some informal investigation by academicians, the science surrounding these activities is lacking and the exact long-term impact on the sensitive Puget Sound near-shore environment is unknown

Aquaculture management within Washington State is diffused among at least five separate agencies, along with Federal and Tribal agencies, that are subject to management procedures, processes and rules that are often conflicting and confusing to agency managers, the industry, and the general public. This diffused system of Aquaculture Management has contributed to the uncertainty and confusion in permitting and leasing for near-shore Geoduck activities and, in this instance, has hi-lighted the need for a more comprehensive, efficient and centralized management system.

While Trout Unlimited acknowledges the economic benefit of Aquaculture operations to the State, we subscribe to the "Precautionary Principle" adopted by the United Nations which offers: "Management according to the precautionary approach exercises prudent foresight to avoid unacceptable or undesirable situations, taking into account that changes in fisheries systems are


slowly reversible, difficult to control, not well understood and subject to changes in the environment and human values".

Trout Unlimited, therefore, urges the Governor, the Legislature and the Puget Sound Partnership to undertake a comprehensive review of State Aquaculture management processes with an eye to developing a more centralized and cooperative management system that would fulfill the state's obligation to the public trust, create consistency, benefit the industry, the general public and the State.

Signed this 17 day of November 2006



Mark Taylor, President



Tammy Mackay, V.P for Conservation