

Delivered-To: ktown@workingartist.com
 X-Mailer: Novell GroupWise Internet Agent 7.0.2 HP
 Date: Tue, 10 Jun 2008 15:42:49 -0700
 From: "Thurston County BOCC" <tcbocc@co.thurston.wa.us>
 To: <ktown@WorkingArtist.com>
 Subject: Re: Coalition to Protect Puget Sound Habitat Position Paper on
 Shellfish Aquaculture
 X-pstn-neptune: 0/0/0.00/0
 X-pstn-levels: (S: 9.06785/99.90000 CV:99.0000 R:95.9108 P:95.9108 M:97.0282 C:98.6951)
 X-pstn-settings: 5 (2.0000:2.0000) s cv gt3 gt2 gt1 r p m c
 X-pstn-addresses: from <tcbocc@co.thurston.wa.us> [2012/83]
 X-Antivirus: AVG for E-mail 8.0.93 [270.2.0/1495]
 X-Antispam: NO; Spamcatcher 5.0.12. Score 30

June 6, 2008

Dear Ms. Townsend:

Thank you for your email and position paper dated May 14, 2008 sharing your organization's concerns regarding shellfish regulations. Over the course of the past year, Thurston County has been contacted by several citizens and representatives of the shellfish industry concerning the expansion of inter-tidal geoduck aquaculture in the Puget Sound and the new practice of individual property owners leasing tidelands to Shellfish Growers for geoduck aquaculture.

As you may know the State of Washington is in the process of reviewing the science and issues related to geoduck aquaculture. SSHB 2220, which was passed by the Legislature in 2007, directed the Washington Department of Ecology (Ecology) to manage this review and other related activities. The Shellfish Aquaculture Regulatory Committee was created pursuant to this legislation. According to the Ecology website, the charge of the Committee is to:

- Develop recommendations for an integrated regulatory process for all current and new shellfish aquaculture projects. The review process includes applicable federal and state permit processes. The committee will report its recommendations and findings to state lawmakers by December 1, 2008.

- Advise Ecology on new geoduck aquaculture guidelines to assist local Shoreline master Program updates. These guidelines will be adopted by rule into Ecology's Shoreline Master Program Guidelines. The department estimates the rule-making process will occur from about mid-2008 to mid-2009.

- Oversee the intertidal geoduck scientific research program. The Committee will advise the Sea Grant Program on research topics and priorities, and ensure that research meets planning, permitting and management needs.

If you are interested in additional information about this issue, it is available on the Committees website: <http://www.ecy.wa.gov/programs/sea/shellfishcommittee/index.html>. Contact with the Committee can be made with Mr. Curt Hart (360) 407-6990 or (360) 480-7908; or by email char461@ecy.wa.gov.

Thurston County continues to monitor the state review process and plans to participate and contribute as necessary and useful to assisting toward a definitive result. Until this process is concluded, we will attempt to determine if a known geoduck farm proposal meets the definition of development, based on the specific proposal. This will be done on a case by case basis and will require some level of cooperation with growers to be able to make a determination prior to planting. If the development threshold is met, the proposal is subject to compliance with the Shoreline Master Program for the Thurston Region as well as the Washington State Shoreline Management Act.

Thank you for your continuing interest in this issue. Until the state review process is complete, we respectfully suggest that concerned citizens contact the various state agencies involved for the best up-to-date information

on the subject.

Sincerely,
THURSTON COUNTY BOARD OF COMMISSIONERS

Diane Oberquell, Chairman

Robert N. Macleod, Vice-Chair

Cathy Wolfe, Commissioner

>>> 05/14/2008 at 8:50 AM:

Dear Thurston County Commissioners,

Attached is the position paper for the Coalition to Protect Puget Sound Habitat. Following is a letter from our coalition president related to our position on shellfish aquaculture:

After two years of examining studies and talking to scientists, we have compiled our Coalition To Protect Puget Sound Habitat position paper which clearly documents 24 environmental issues that must be addressed prior to further aquaculture expansion. We have volumes of information, so it is difficult to condense such a complex issue into a concise seven page paper with supporting documentation. Scientists have warned that the industry slogan that shellfish "clean the water" must be carefully analyzed to insure that other Puget Sound native species food supply is not depleted by the preferential treatment of farmed shellfish. In addition, the ingestion of zooplankton by clams in our critical nearshore areas is a serious concern to fish biologists and food web scientists.

We did not include restoration projects in this position paper, because oysters, not clams, are used world wide for restoration and most sites are not commercially harvested. Unlike clams, oysters will continue to filter phytoplankton even when their nutritional needs have been met. If restoration is the issue, then communities should be looking at adding oysters on a small natural scale in selected sites with no harvesting allowed to see if this helps their local environment.

Our documentation should make it clear why citizens are adamant that shellfish aquaculture be included as a threat to nearshore habitat and the recovery efforts for salmon. I have included one of our many pictures at the end of this letter that shows Cape Horn in South Puget Sound where a once habitat rich cove has been converted to agriculture. You can see the "kiddie pools" (geoduck seeds) installed directly into the nearshore and row after row of PVC 12" pipes. Geoduck installations exist on large swaths of acreage in Totten, Eld, and Henderson Inlets and Nisqually Reach. This conversion to agriculture cannot be considered protecting our shorelines natural characteristics or providing habitat critical for native salmon survival in our pocket estuaries, bays and coves.

Please feel free to contact me with any questions or comments. We look forward to working with Thurston County to insure that adequate protections are implemented for our nearshore areas for future generations.

Sincerely, Laura Hendricks

On Behalf of: The Coalition To Protect Puget Sound Habitat
Henderson Bay Shoreline Association, Protect Our Shoreline, Case Beach Shoreline Association, Case Inlet Shoreline Association, Mayo Cove Shoreline Association, Anderson Island Quality of Life and Parks Board, Citizens of Harstine Island, Stretch Island, Vashon Island and Jefferson County

Kathryn Townsend
Protect Our Shoreline

(<file:///c:/> and settings documents Horn Aquaculture Development.JPG)