

December 4, 2022

To: Ron Buckholt  
Community Development Center  
Thurston County, Washington

RE: Development Project 2022103702

Dear Mr. Buckholt,

**I am writing to express my strong opposition to the proposed Shoreline Substantial Development Permit for project no. 2022103702, parcel no. 93000100000 (“Oysterlands” OL 5-19-1W, Olympia WA), which proposes to “plant and cultivate geoduck clam, manila clam, and oyster intertidal culture.” This proposal *must* be rejected.**

**I also ask that you extend the public comment period to allow sufficient time for potentially affected residents and community members to voice their responses. Furthermore, I urge that you suspend deliberations on the proposal until a thoroughgoing Environmental Impact Study has been completed.**

I grew up on Henderson Inlet, on the West Side of Johnson Point, where I lived for the first eighteen years of my life. I spent many summers as a kid swimming and kayaking in waters just feet from the proposed commercial development site, and I return there multiple times a year to visit my parents, who still live in the home they built there in the early 1990s. I can tell you firsthand that this an incredibly special and very ecologically diverse place, and one that has had a resounding influence on my life. Naturally, I was quite disturbed to hear of this proposal: one that would allow for-profit commercial exploitation of these tidelands by a disputable international corporation with the potential to irreversibly damage this fragile, irreplaceable environment—all for an export crop that serves little to no purpose for the people of Washington.

**The proposed project should be denied** for myriad reasons—most obviously that (1) **the proposed project flagrantly exceeds the scope of developments permitted by the Shoreline Master Program**, and **would pose unacceptable, unstudied risks** to Puget Sound and shoreline ecology; (2) **Taylor Shellfish corporation is the only real beneficiary of this plan**—not the people of Washington State, and certainly not Henderson Inlet residents; and (3) **the proposed development directly violates principles codified by our state legislators**, including under *RCW 90.58.020*.

Let's take a closer look at each of these points.

**(1) The proposed project flagrantly exceeds the scope of developments permitted by the Shoreline Master Program (SMP).**

As we know, the Shoreline Master Program (SMP) states a requirement of *“little visible evidence of permanent structures and occupancy.”* But, as the below photos of previous geoduck cultivation make clear, this requirement is clearly violated by the stated proposal. The PVC tubes these projects employ literally blanket a beach, transforming its usability for recreation. Use of the beach is entirely changed by such projects, and are not only highly visible any time the tide is low (twice a day) but hugely detrimental to the recreational viability of the beach for boaters, swimmers, rod-and-line fishing—the list goes on. Also, large sheets of netting (not pictured) are typically attached to the tops of these tubes. The entrapment of birds and other wildlife in the netting used in these developments has been well documented, and their use should never be allowed.



As we also know, the SMP prohibits management of non-renewable resources which result in long-term, irreversible impacts on the natural character of the environment. I am not aware of any scientific studies that have seriously studied the environmental impact of this wall-to-wall immersion of PVC pipe into the sensitive Puget Sound marine environment, but many scientific studies point to the growing danger of plastic and microplastics in our environment. The dangers of plastic debris towards wildlife in the environment are well known. *The use of PVC pipes*



*(typically installed at an astonishing density of 25 clams/m<sup>2</sup>) is therefore not an acceptable practice under the stated purposes of the SMP.*

As the SMP states, *“preferred uses are non-consumptive.”* Therefore, to imbed around 100,000 PC tubes onto each acre of the intertidal portions is an obvious violation of this requirement. Do the math: for the proposed 3.6 acre coverage, that is over 360,000 tubes. This is extreme overutilization, from which the beach may “recover” in terms of its commercial productivity, but, again, for which the long-term effects are not known.

The SMP also states that *“the intent of Conservancy Environment Designation is to protect, conserve, and manage resources and valuable historic and cultural areas in order to ... achieve sustained resource utilization.”* Planting a geoduck farm does absolutely nothing to protect or conserve our shoreline; indeed, it does just the opposite, as the entire beach is liquified every few years, in a repeating cycle that totally changes the character of the environment by introducing new organisms and annihilating many of those that are present.

Such intensive aquaculture may also have significant (but mostly unstudied) effects on the trophic relationships that make up the tideland environment—including the potential overconsumption by geoduck of foodstock microorganisms, which are not confined the tract of leased tidelands, but are shared by the entire ecosystem. This has the potential to bring about unknown effects that make their way up to higher trophic levels in the food chain, including possible impacts on fish, birds, land and amphibious mammals, and cetaceans like our endangered Orca whales.

**(2) Taylor Shellfish corporation is the *only* true beneficiary of this plan.**

An international for-profit corporation has no place developing Washington’s residential beaches. Let’s not kid ourselves: geoduck are an export crop, scarcely consumed by Puget Sound locals, but largely sent overseas. These aquaculture developments would not feed our communities—on the contrary, they would foreclose on local access to traditional clam

diggers—and should not be allowed to be implemented at the monetary and environmental expense of the people of who spend their lives on the beachfront.

Notably, Henderson Inlet residents are part of special taxation zone, which means they have paid extra funds to help support the restoration and conservation of Henderson Inlet. These funds should not be used as de facto subsidies for an international corporation so that it can exploit the tidelands in this residential environment for exclusively commercial gain.

**(3) The proposed development directly violates principles codified by our state legislators.**

According to *RCW 90.58.020. Legislative Findings – State Policy*, a use preference is stated as follows:

“The legislature finds that the shorelines of the state are among the most valuable and fragile of its natural resources and that there is a great concern throughout the state relating to their utilization, protection, restoration, and protection. Unrestricted construction on the... shorelines of the state is not in the best public interest.”

It is obvious that the proposed utilization by Taylor Shellfish violates this principle, as codified by our state legislators. *It must not be allowed.*

Proponents of tideland development might argue that there is “precedent” set by past violations of this principle (i.e., other commercial tideland exploitation projects). However, such violations do not equate to a reason to permit this inappropriate usage of our Puget for the personal gain of a few. On the contrary, our role as residents and community members of this remarkable place must be to serve as its stewards and protectors, so that future generations may benefit from its beauty and natural abundance. If we don’t stop this project and others like it, our children and grandchildren may never get to experience the Sound as we have been fortunate to.

In short, to allow this project to go ahead in Henderson Inlet would be to allow a massive extraction project with no local benefit, that violates the letter and the principle of the SMP, and

that has unstudied and potentially significant environmental risks. **I urge your office to reject this permit.** Meanwhile, I urgently ask that you **extend the public comment period** and conduct a proper and thoroughgoing **Environmental Impact Assessment** before continuing these deliberations.

Thank you very much for your consideration of these points. Olympia, and the Henderson Inlet, will always be my home, and I'm grateful for your office's help ensuring that they are conserved, as we work together to fulfill the role we all share as stewards of our irreplaceable ecosystems.

Sincerely,

Sam Smith  
(360) 259-1976