

Ron Buckholt

From: Tristan Atkins <atkinstka@gmail.com>
Sent: Thursday, December 1, 2022 2:36 PM
To: Ron Buckholt
Subject: Public Comment: Project no. 2022103702, Shoreline Substantial Development Permit

Mr. Buckholt,

Please consider this email my "public comment" regarding Project no. 2022103702, a Shoreline Substantial Development Permit at Oysterlands, OL 5-19-1W Olympia, WA, Parcel number 93000100000.

As a landowner on Henderson Inlet (9247 Otis Beach Street NE, Olympia, 98516) and a former U.S. Army Corps of Engineers officer with knowledge of shoreline development projects, I **strongly object** to this type and scale of commercial/industrial shellfish production that is planned.

My understanding is that with each planted geoduck comes a 4" pvc tube and a plastic screen that protrudes from the beach for two years. When the clams are harvested at 4-7 years, the geoduck, which extend three feet into the beach, are blasted out by use of a hydraulic gun, which significantly disrupts the soils and ecology of the beach. The beach recovers in time, maybe two years, but then the cycle is soon repeated. Based on my research, the environmental impact of this intensive geoduck production on an industrial scale has never been studied. My understanding is that it has not been proven that densely planted geoducks have a cleaning/filtering effect on the aquifer as is sometimes claimed; indeed, the opposite may be true.

If this permit is allowed and it becomes an expanding industry in the Henderson Inlet, we have the potential for hundreds of thousands of pieces of PVC pipe to be planted and cycled through our beaches for decades. The impact of beach destruction on the ecosystem, including native birds, fish, crabs and mammals is really not known.

As the former aviation director for the Washington State Department of Transportation (2011- 2017) we were required to complete the Environmental Impact Statement (EIS) process under SEPA for most state-managed airport projects. I would expect that this project would require the completion of the EIS process before the permit application can proceed.

Again, I'm **strongly against** this project primarily because of the potential negative impact that it will have on our mostly pristine beaches and the ecosystem that they support.

v/r

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