



PROTECT HENDERSON INLET  
*Preserve and restore*

[www.ProtectHendersonInlet.org](http://www.ProtectHendersonInlet.org)  
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21 March, 2023

TO: Kraig Chalem  
Community Development Center  
Thurston Co Washington

RE: Development project 2022103702  
Subject: unsuitability of project site

THURSTON COUNTY  
RECEIVED

MAR 21 2023

DEVELOPMENT SERVICES

Mr. Chalem:

I am writing on behalf of the non-profit group, Protect Henderson Inlet (PHI) concerning the permit application (project # 2022103702) for an aquaculture project off Johnson Point Loop.

We feel that the county should be aware that the parcel for this permit has major limitations for commercial aquaculture.

**The choice of this site for geoduck aquaculture should be closely scrutinized as it represents a potential disaster from loss of plastic to the environment. This should be considered in the Environmental Assessment and a full Environmental Impact Statement should be considered.**

Please consider these details carefully:

This site is unusual compared to other projects where geoducks are farmed because of its extreme exposure. Please refer to the attached marine maps.

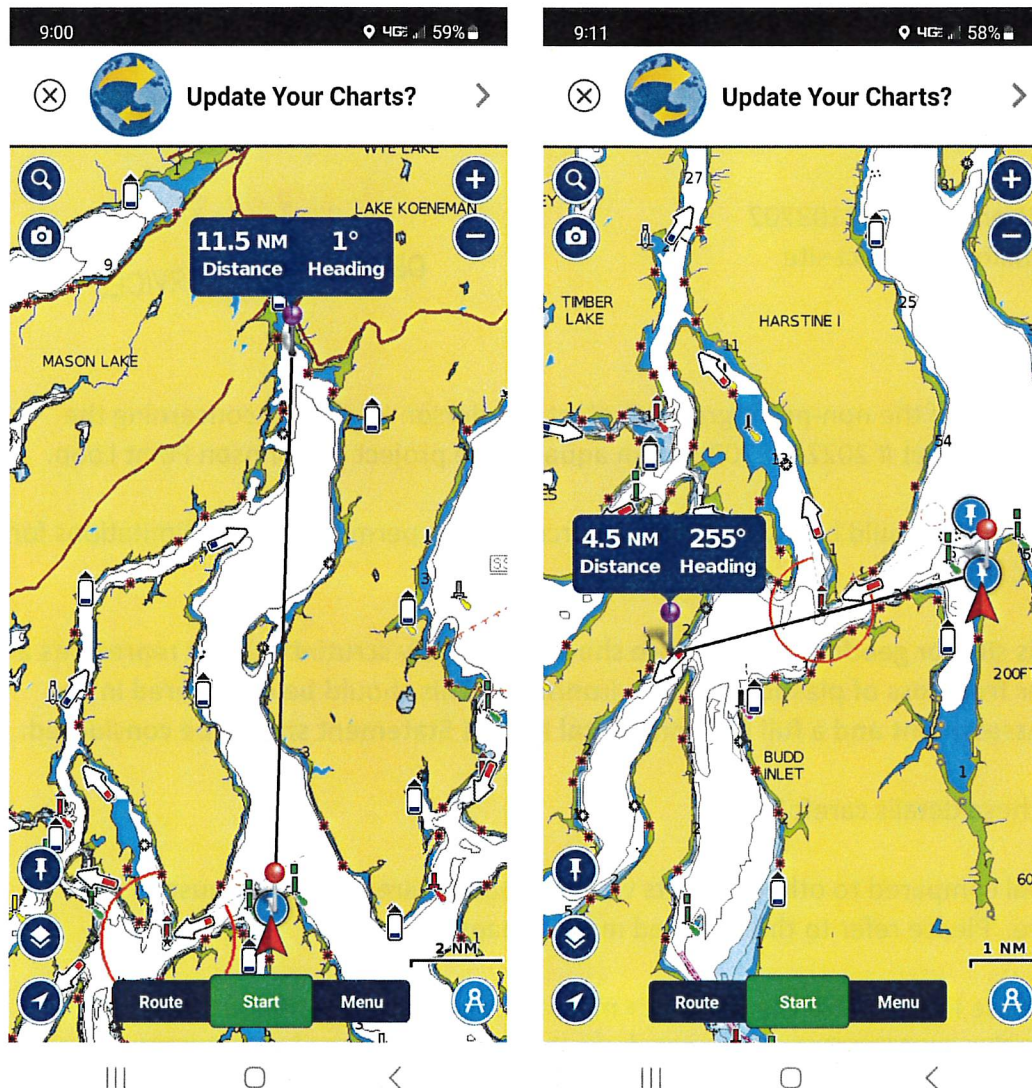
To the north lies Case Inlet, where there are 11+ miles of open water continuous with the proposed site. To the west lies Dana Passage where there are 4.5 miles of open water. Local sailors are well-aware of the funneling effect of the marine bluffs on wind, and residents know that storms do create pronounced wave action on this beach.

In our most common storm from the southwest, the site is only mildly exposed. However, in storms from the west or north this beach is directly impacted. When there is 40+ knot wind, the beach is thrashed with waves up to 4 feet. We have winds of 20+ knots many times through the year, probably every week, and you can see what a small amount of wind does in this video.

<http://www.youtube.com/watch?v=XIWvjI9i9-w>

Note also in the video the various aquaculture debris on the beach from local commercial shellfish operations.

While severe storms are less common, they typically do occur several times a year, frequently coming from the west or the north. I live 1/4 mile south of the proposed site, and I have personally witnessed winds over 60 mph.



David Hall is a resident whose property adjoins the Mazanti-Taylor site. You will find his letter opposing the site in your comments file. David has a lot of experience growing oysters on this beach, having sponsored 3-4 thousand student visitors during the last couple of decades. This has been in collaboration with South Sound Green, an educational program which has taught students about beach ecology, including a program on oyster growing. (By the way, this beach



that has been used for decades for this program will no longer be accessible if this permit is allowed).

David has learned that oysters can only be grown in bags because loose oysters are rapidly dispersed by wave and current. We on Johnson Point and Otis Beach are used to finding stray oyster bags from commercial shellfish operations across the inlet washing up on our beaches (see photos). We realize the Taylor likely can use robust methods to secure oyster bags (they will have to do so). However, it is highly unlikely that individual geoduck tubes can be adequately secured in the beach against a pounding 4-foot surf. Given the plan of planting 146,000 unsecured tubes in the beach ( $10 \text{ tubes/m}^2 \times 4047 \text{ m}^2/\text{acre} \times 3.6 \text{ acres} = 145,692$ ), there is the potential for a disastrous result, with plastic tubes scattered for miles. Please also be aware that currents along this region of South Puget Sound are strong in nearby Dana Passage which is listed in the top 7 channels of Puget Sound for current speed (Encyclopedia of Puget Sound).

Taylor has previously submitted letters to the County Planning Commission (during the revision of the Shoreline Master Plan in November 2020) indicating that they have a plan for collecting lost tubes from their geoduck planting sites. It seems reasonable that they could collect errant tubes that wash up on the beach after a storm if they were prompt in their actions, but it seems unlikely that they could recover a significant number of tubes lost in deep water, which would require extended time with SCUBA gear traveling well beyond the borders of the site. It is my understanding that geoduck operators typically dive the site only about once per year.

Let's think about this: If Taylor lost only 1% of its tubes in a severe storm, that would be 1,500 tubes, roughly 7,500 pounds of plastic! Even loss of 0.1% (150 tubes) might be beyond the capability of a dive crew to recover. In reality, we really don't know how many tubes are lost because there is no compliance monitoring by Thurston County, and the shellfish companies don't report it. Certainly, the county would not issue me a permit to dispose of this volume of plastic waste in the marine environment.

**The bottom line: Permitting for this site should be denied based on risk to the environment from lost plastic which is now being globally recognized as a major threat.**

Please see discussion on [www.ProtectHendersonInlet.org](http://www.ProtectHendersonInlet.org) for the real risk this plastic poses. A separate letter to the county detailing these risks has been submitted.

Sincerely,  
Ron Smith  
Protect Henderson Inlet  
[www.Protecthendersoninlet.org](http://www.Protecthendersoninlet.org)

