

**Re: 2022103702 Taylor Shellfish/Manzanti Geoduck SSDP**

We strongly oppose allowing the permit for Project 2022103702 Taylor Shellfish/Manzanti Geoduck SSDP on Johnson Point Loop, and we support the work of the Protect Henderson Inlet organization.

The quality of any decision made is dependent on the adequacy of relevant information. The Protect Henderson Inlet organization has raised a considerable number of concerns and questions about the Geoduck Aquaculture Research Program report (Nov. 2013). If this report and other similar studies form the basis for a decision to approve this project, there has to be some form of accountability in justifying the decision. The concerns and questions raised need to be addressed.

One such justification for approving previous similar projects has been the suggestion that the habitat may revert back in 1-2 years. The permits awarded are indefinite, however, and Taylor Shellfish does not decommission geoduck farms to revert back to nature. Once the aquaculture is established, it remains indefinitely. Thus, if the project is approved, the permanent effect on the natural habitat has to be considered with the geoduck farm in place.

The current decision-making environment has a strong bias in favor of the project:

- Lack of information, study, or experience on long-term effects on the marine environment.
- Outdated and lenient SMPs favor aquaculture projects because environmental safety rails are not in place.
- There is now an established precedent of 9 applications and 9 approvals as a result of the above.

Maintaining this bias would result in a hopeless situation where this project is accepted without adequate knowledge available to determine its feasibility. When concerns and questions raised by PHI and others remain unanswered, yet the decision-making process goes ahead, any project application is effectively rubber-stamped as accepted with bias and without genuinely, and with great consideration, weighing the consequences.

A question I have for the decision-makers is: What are the criteria for not accepting the project? If the concerns and questions raised in the studies, the points made on the interpretation of law and rules, and vigorous resident opposition are insufficient, what more would be sufficient? We are concerned that this public hearing process may merely give the appearance of impartiality.

One alternative to a fast-track rubber-stamp approval would be to put a moratorium on this project application until the updated SMP is in place to provide informed guidance and safety rails for consideration.

Pam and I always enjoy our walks on the beach, appreciating the rich marine and seashore life, and the tranquil surroundings of Henderson Inlet shoreline. At low tide, we enjoy getting a stick and having a little dig to see if we can find one of the ugly marine worms, a clam, or a moon snail. It is an enchanting place that deserves to be protected and nurtured, not exploited for profit.

Mark Butcher  
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