Exhibit 22

Industrial Garbage of Henderson Inlet

And Current ECOLOGICAL CONDITIONS

Tonni Johnston January 5, 2024

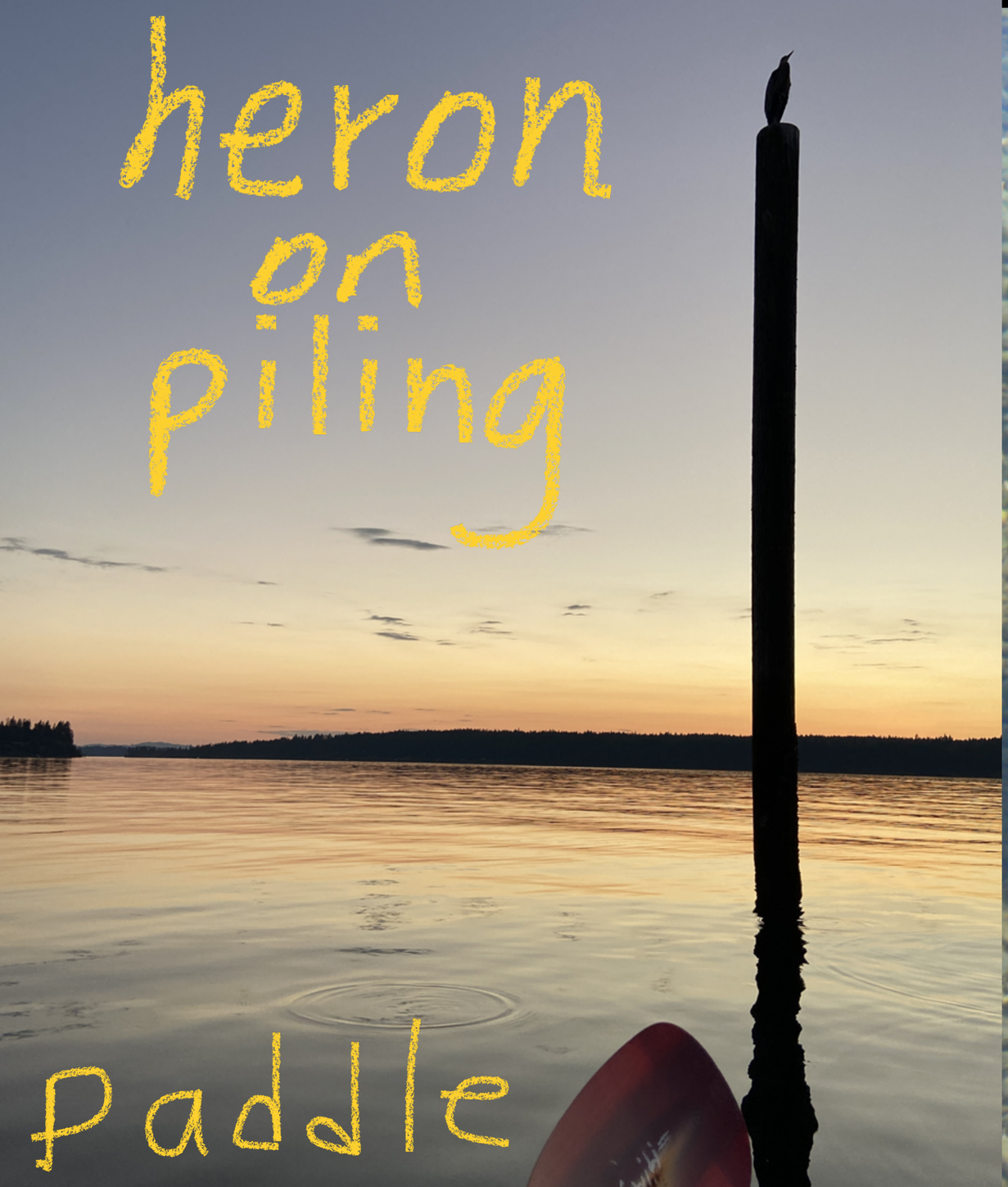
The place of the proposed application is beautiful. The kayak club in the following photo is drawn to the soft surface here to come ashore without marring their boats and to rest from paddling. Maybe kayaks will not find flexible HDPE prohibititive but the tillers, daggerboards, and propellers on many of our catamarans and boats would. Based on our SMP, this application should be rejected because it would bring a net loss of ecologic function from the aspect of prohibiting people from freely coming ashore here at lower tides.

The following slide shows photos of peoples’ encounters with the environment at the place of the proposed application. On an educational beach walk, sponsored by Protect Henderson Inlet.org, and led by Dr. Bob Wharton, members of the community learn about benthic life. Moonsnails, like the one pictured, lay 500,000 eggs at a time and leave behind large egg casings that look like rubber toilet plungers. My granddaughter scoops soft sand in winter in the other photo. Note the piling in the background that marks the near center of the application. Since we risk losing encounters with the environment like those shown in these photos, which would result in a net loss of ecologic function, the application should be rejected.

moon snail

PILING

Here by Mr. Hall’s piling, the center of the project, amazing creatures abound, like king fishers who patrol their territory with a ratchety rattle, or great blue herons who are shy one moment and noisy the next. We want to keep hearing their calls as they echo throughout our Inlet and for these natural inhabitants to remain undisturbed by humans filling the days and/or nights with the sounds and activities of hour upon hour of motorized machinery work.


heron
on
piling
paddle


SUN STAR

We’re told that companies who work this area wouldn’t hurt it. That is false information. At one hundred yards up this pretty beach people enjoyed by many is the industrial garbage of a shellfish company.


Piling
beach combers

These photos show an aluminum boat buried into the beach. Someone finally removed it’s ruined outboard. There are bundles and bundles of loose flexible HDPE bags. There’s a large work table tumbled on its side. There are other bags, some ropes, and many many zip ties, all far along in the process of degradation.


BAGS
BOAT

Dozens at a time of these polluting flexible HDPE bags go free from here. They scatter far and wide, for hundreds of yards, lodging wherever a rock protrudes from the surface of the beach, or drifting with the open sea. No care is taken to secure them or to protect the gear from the degradation effects of UV exposure, year after year.

BOAT

BAGS

The endless trail of zip ties.

Fragments of zip ties. Zip ties everywhere. I bring the garbage home when I can. Bags, trays, foam pieces, ropes, fenders, gloves - if it’s from industry, you can find it. There are only three items I have ever come across from recreational use. One was a kayak paddle. Another was a pair(!) of plastic sandals. The third was a dog frisbee.


BIG
TRAY

The photos of the following geoduck pieces are our largest to date. When I called Mr. Xia to come get his large aluminum cabin boat with twin 150 hp outboards off my land, he tossed me three geoducks but never said thanks or sorry. The geoduck houseboat ground into my beach at summer surf smelt height during spawning for 3 tide cycles before it was collected again by its owner.

Unlike these giant pieces of gear, it may seem that zip ties have nothing to do with geoducks. Please notice the HDPE geoduck piece in the next photo that washed up at my beach last month. It’s labeled as directed. Unfortunately, the label is on just another degradable zip tie that will soon break away.


SLLC 360.236.0462

360-236-0462. Taylor Shellfish? No.

Taylor used to follow the labeling rules. The industry says all commercial aqua gear carries durable labels. Without oversight, few companies today abide by the responsibility labels bring.

Taylor labeled the tubes in the following photo 12 years ago.

Danna Webster, KP News

On May 15, the Boysen family found their tideland property south of Vaughn Bay, littered with grey PVC geoduck tubes marked "Taylorshellfish.com." About a dozen family members were cleaning their cabin and picnicking on the beach. Cathy Boysen Heiberg grabbed a rake and began to collect the debris. Family members joined in and soon collected two garbage bags full of nearly three dozen PVC tubes.

The next photo shows a Taylor tube in late summer 2023 from near the Lockhart property, directly across the Inlet from me. No label.

The next photo shows the same .9 permitted area, covered by 100s of yards of not very well netted tubes. This area is particularly hard hit by sea lions the last several Fall seasons into winter. This year there are at least three dozen sea lions taking up residence on the west side of the Inlet, no doubt attracted by one of their favorite foods, geoduck, while frustratingly taking their lion’s share of our precious salmon run. Please refer to the July 2023 hearing regarding the Seattle shellfish geoduck application, where the company describes an increased need for netting because of the relatively new pest - the sea lion.

In 2024 we can do better. A Washington state university plastics lab teaches that first, we should not be putting any new plastics into our water. Second, we should require HDPE to be used in place of PVC. Though HDPE degrades by the same means as PVC, and contributes significantly to plastic pollution, it is very recyclable compared to PVC which is difficult to recycle. Third, we should date when the gear is due to be recycled. Fourth, the chemical makeup of the gear should be revealed. Fifth, there should be oversight to ensure all gear is labeled well and that it is protected from UV degradation whenever not in use on site.

The next slide shows my sandal which measures just under 11” in a commercial industrial geoduck planting area.

We’re told plantings are one tube per square foot. For the proposed first of its kind geoduck industrial operation on Johnson Point, one tube per foot would conservatively total more than 68 tons of plastics, not counting any netting, which will surely be needed because of the conditions and predation by the prevalent river otter and sea lion populations here. Does anyone check that the numbers are not even more gargantuan?

These tubes (at an Arcadia Co. lease), are at one per 8 inches, which is 22 tubes in place of the prescribed 16. Where is the oversight?

The problem with fudging higher numbers is that the result is even more plastic into our waters. Even more geoducks from non-native stock, along with more geoduck poop, and **less** surrounding substrate for sand dollars, crabs, moon snails, herring and smelt, and flatfish to manage around. Plastics pollution is a net loss of ecologic function which is not allowed under the SMP. For this reason, the permit should not be allowed.

The next photo shows piles of dead sand dollars killed during the commercially permitted, industrial planting of geoducks.

What about the sand dollars? Common practice finds companies “relocating” them to higher ground.

Workers told the citizen who saw it happening in this photo that they were still alive when they weren’t and that killing them shouldn’t bother her anyway since it was for the greater good of providing geoduck food for people. A fish and wildlife officer told her he had no jurisdiction on private property. Losses like these continue.

Zangle Cove, since aquaculture has come, has lost its native geoducks. It has lost its nearby eelgrass! Zangle Cove’s previously prolific sand dollars are wiped out! The resolve of residences suffered too when they reported the simple-to-verify fact that Taylor planted well above what was permitted - all the way to an astonishing plus 4 tide, but authorities did nothing to help or fix the gross encroachment. The expected loss of native geoducks, kelp, and sand dollars at the place of the proposed application would be a net loss of ecologic function, and for these reasons too, the permit should not be granted.

The final slide in my presentation brings us back to the very place of the proposed application. The cove here and its delta teem with life. It’s a place where we listen to the magical sound of surf smelt as they land from high arcs. Look carefully and you will see their circles of reentry.

As the sky turns dark here, sea worms propel through the water in luminescent violet-blue colors. Hard to believe but true!

I could go on and on but wish to leave you with the invitation to please come experience this place as it is before making a decision that could forever change it.

Thank you again for the opportunity to present my opinions. Please do not hesitate to contact me for further clarification.


Smelt
RINGS