

From: [Bill & Sherry Reus](#)
To: [Sonja Cady](#)
Subject: Fwd: Taylor Mazanti Permit 2022103702
Date: Thursday, January 11, 2024 11:13:50 AM

Ms. Cady,

I am pleased and grateful that Examiner Rice has held open the record for three days so that anyone who was unable to make all the points they wanted to make due to the power failures could complete their arguments. I am one of those. See below.

Thank you,

William Reus

Sent from my iPad

Begin forwarded message:

From: William Reus <reusters@comcast.net>
Date: January 11, 2024 at 10:59:40 AM PST
To: William Reus <REUSTERS@COMCAST.NET>, Ronald Smith
 <protecthendersoninlet@gmail.com>
Subject: Taylor Mazanti Permit 2022103702

To: Examiner Rice and Sonja Cady, Land Use Clerk

From: William Reus

Date: January 10, 2024

Re: Taylor Mazanti Permit 2022103702

I am submitting testimony that I was unable to make on Tuesday January 9, 2024, due to the power failure. I will try not to be redundant. I need to review some content to resume the argument encouraging denial of the permit. I hope that I have already stated the SMP 1990 goal that Thurston County Shoreline use must be essential to the life and well-being of its citizens. I have stated reasons why geoduck aquaculture fails this: Transpacific shipping adds greenhouse gases to the atmosphere. The Mazanti tax parcel pays less than 0.1% of property taxes compared to taxes paid by adjacent homeowners. Thus missing the opportunity to benefit local citizens.

I want to point out how aquaculture has changed over the past twenty years, how it is now geoduck focused and very lucrative for growers. From the Washington Sea Grant report to the Washington Legislature we see that geoduck cultivation went from essentially nonexistent in 2000 to 18% of all shellfish harvested by weight and 44% by value in 2013. In a 2018 article in the Seattle Times, Jim Gibbons stated, "On any given day, about 90 percent of farmed and wild geoduck clams are exported to China." In a 2020 article the local publication, Crosscut, reported "Geoduck exports compose roughly 85 percent of Seattle Shellfish's revenue, and most of that demand from China." In this application, Taylor dropped their plans to cultivate oysters focusing only on the more profitable geoduck portion.

The Asian market, accessible by air freight, has changed South Puget Sound

aquaculture. The race to control tidelands suitable for geoduck growth is on. This behavior is expected from the growers. Why would the County move away from the SMP 1990's clearly stated goals? Though not answering the question, the phenomenon has been observed and labeled Mission Drift. This is a situation where an organization moves away from goals outlined in a mission statement. It can also be defined as the slow carrying away of an organization from its core purpose and identity. The County should see this and fix this.

In so far as they do not, I suggest another phenomenon is also in play. Regulatory Capture is an economic theory that regulatory agencies may come to be dominated by the interests they regulate not the public interest. It was described by Nobel laureate George Stigler. An agency (in a broad sense the County), can come to advocate for the interest of an industry they regulate (shellfish growers). They shift the burden onto the citizens. Without going into detail, I will cite the Henderson Inlet Shellfish Protection District as a possible example of shifting the cost and burden of creating fecal coliform free water to the taxpayer. The attached report from the WDFW and the DNR includes an up-to-date description of water quality in front of my home on Henderson Inlet (see page two). The water is clean. Clean water attracts those seeking a profitable export. The burden and expense to make sure septic systems don't threaten clean water remain on the homeowner even if the threat was overestimated, wrongly assigned to septic systems exclusively and no longer present.

In conclusion geoduck aquaculture:

- Does not benefit the scenic or aesthetic aspects of the Shoreline.

- Does not widely benefit the lives or well-being of the citizens of the Thurston Region.

- Adds many tons of greenhouse gases to the atmosphere.

- And thus violates the goals of the SMP.

I strongly disagree with Mr. McCormick's assertion that there is "no SMP provision against exporting geoducks". The activity fails to meet the SMP's goals. For the same reason I strongly disagree with Mr. McCormick when he says it is "likely that the project is consistent with the SMP." Of course, one needs to take a big picture view to think that the goal statement is important and to see that a lucrative Asian export was not the vision in 1990. In my opinion, we seem to be seeing Mission Drift and Regulatory Capture. Please consider denying the permit.

Finally, with respect to my remarks on Dr. Rosalind Schoof PhD. and her comments about the homeowner's washing machines and septic systems being the source of microplastics in the salt water near these homes, I'd like to clarify. I am sure she is correct to say one source of microplastics is run off from upland sources. I believe a load of wash can put microplastics into the septic system. I saw no scientific data to suggest tagged microplastics put into septic systems have been collected in the salt water. I saw no measurements of current levels of microplastics in the area. She is an expert witness for Taylor Shellfish and is speculating irresponsibly. I refer you to the previously mentioned Henderson Inlet Shellfish Protection District to point out how blanket speculation about homeowner's septic system by shellfish growers can, through regulatory capture, lead to major actions, some harmful, in that community.

Attachment: Please refer to a paragraph on water quality on page 2 and a map labeled figure 2.

https://www.dnr.wa.gov/publications/aqr_ea_henderson_inlet_16150_230428.pdf

Thank you.

Sent from [Mail](#) for Windows

www.dnr.wa.gov/publications/agr_ea...
henderson_inlet_16150

See page 2 and figure 2

ENVIRONMENTAL ASSESSMENT OF PROPOSED GEODUCK HARVEST
ALONG THE NORTHERLY SHORELINES OF HENDERSON INLET
AT THE HENDERSON INLET GEODUCK TRACT (#16150)

Commercial geoduck harvest is jointly managed by the Washington Departments of Fish and Wildlife (WDFW) and Natural Resources (DNR) and is coordinated with treaty tribes through annual harvest management plans. Harvest is conducted by divers from subtidal beds between the -18 foot and -70 foot water depth contours (corrected to mean lower low water, hereafter MLLW). Harvest is rotated throughout Puget Sound in seven geoduck management regions. The fishery, its management, and its environmental impacts are presented in the Puget Sound Commercial Geoduck Fishery Management Plan and Final Supplemental Environmental Impact Statement (WDFW & DNR, May 2001). The proposed harvest along the northerly shorelines of Henderson Inlet is described below.

Proposed Harvest Dates: 2023- 2024

Tract name: Henderson Inlet tract (Tract #16150)

Description: (Figure 1, Tract vicinity map)

To: Santa Cruz
From: William Kren
Subject: The New Forest
Date: Friday, January 12, 2024 8:03:15 AM
Yesterday I submitted the comments on the proposed permit that I was unable to deliver due to the power outage. My comments concluded with a link to a publication by the WDFW and DNR. Rather than hoping that the Examiner would have the time to open the link, I have instead attached the title page, the relevant paragraph on water quality and the figure which is a map.
Thank you.

Sub-surface substrates observed during collection of geoduck dig samples include gravel and shell, and characteristics include "compact" (Table 2). The surface substrates within this tract are highly variable with mud predominant on 52 of 72 transects. Sand was predominant on 19 of 72 transects. Shell, cobble, and gravel were also regularly encountered. (Table 3).

Water Quality:

Water quality is good at the Henderson Inlet tract. Water at this tract is affected by strong water currents and turbulence of Dana Passage, which prevents stratification (water layering) and brings deeper, nutrient-rich waters to the surface. As a result, the water quality in this area is high. At a WA Dept. of Ecology water quality station in Henderson Inlet (HND001- Henderson Inlet-Cliff Point), the minimum dissolved oxygen (D.O.) concentration reported between 10/5/92 and 12/18/2006 (most recent data year completed) from a water depth range of 9-11 meters was 4.2 mg/L, with an average D.O. of 7.98 mg/L. D.O. concentrations below 3.0 mg/L for extended periods may cause stress in marine organisms. Maximum water temperatures at this water depth range and within this time frame varied between 6.85 to 15.33° C. The acidity at this water depth range and within this time frame varied between a pH of 7.6 to 8.8.

The harvest area within the tract boundary polygon is classified as "Approved" by the Washington Department of Health (DOH) for commercial shellfish harvest. This area has been tested for inorganic arsenic levels (Jerry Borchert, DOH, pers. comm., 7/10/14) and this tract is not currently on the list of approved tracts for exportation of geoducks to China. DNR will verify the health status of the Henderson Inlet tract prior to any state managed commercial geoduck harvest on this tract.

Figure 2. Control Points Map,
Henderson Inlet Commercial Geoduck Tract #16150

