

Friday, January 12, 2024

Re: 2022103702 Taylor Shellfish/Manzanita Geoduck SSDP

Summary of Concerns about permit hearing and applicant's evidence:

The permit should be refused because:

With due respect and appreciation for the work of the hearing examiner and the county clerk: Appearance of partiality in favor of applicant

Unrestricted time for applicant vs pressure on community to hurry up

Asking applicant's attorney for permission and guidance, not asking community or PHI attorney

County examiner's lack of concern falls somewhere between complacency and collusion with applicant.

- The County Planner did not meet obligation to produce independent review of the scientific information presented, or require sufficient independent evaluation of species impacted, as is required.
- County planner did not fulfill duty to review input or gather necessary input, dismissed value of comments received prior to meeting, only read some comments, and those in the timeframe just before the hearing
- The proposed site abuts the upland resident's beach. Initially, applicant asked for permit of up to +5, but is not saying +1. The applicant has an alleged history of violating this upper limit, abutting owners have not had satisfactory recourse- they just have to accept the violation. The SMP indicates the project must be marked. Permit should not be approved unless an uncontested survey is completed and submitted, and county inspects site.
- County planner left the meeting, could not answer the question of distance to upland residence. Answer provided by Ms Cady, who valiantly hung on throughout the meeting, despite loss of power, but the google answer (200 ft) accuracy is not at this point accepted. Owner says it is 85 ft.

There is absolutely no science that can be used to say that applicants proposed activities would not harm or cause net loss to environment

Applicant's hired Ph.D. presentation was the worst kind of misuse of academic standing. Use of irrelevant, out of date studies of topics irrelevant to this permit, and insufficient for global statements- she even tried us to believe her that microplastics are not a problem. The mussel study she cited is irrelevant and not timely. The health departments in charge certify whether or not the shellfish is safe. Her mussels, in the irrelevant study she proclaimed about, are not the issue. Microplastics are a global issue, magnified throughout the food system, and like mercury in tuna, larger and larger impacts up the food chain. There is no science that applicant can use to say that the petroleum based compounds - PVC and even HDEP netting- are not releasing toxins into the environment. The comments she made about most of the plastic garbage occurring around cities, so no worries about south sound is like saying since the release of radiation at Chernobyl was so huge and so far away, we wouldn't have to worry about radiation released if medical facilities began dumping in the sound. Her arguments are specious. They do not say applicant's process will not harm the sound.

Per Applicant: Permit adversely impacts upland owners- in addition to other concerns, it actually will restrict building, use, and sale of upland property

Proposed project Impacts value by requirement of disclosure conditions in the event of sale- in addition to impacting property value by degrading view, reducing use of shore, but per applicant, also actually impacts potential sale by requiring disclosure of the noisome aquaculture project.

The site is impacted by large waves and current- Applicant misleads with term "fetch", that fetch is same as other sites. Fetch is only one component of power of water. This site is heavily impacted by prevailing winds, and currents- up to 20 feet of tide ripping by during a big spring tide. Wave action: Huge. Please review video submitted showing the size of waves generated in a storm. Please review this. The waves are Huge. The bank on the bluff is eroded by the waves, and the nearby bank sluffed. The county, to repeat, had no idea about this.

Applicant says nets "only 24 months" of a cycle. Please do not be comforted by the 'only'. 24 month is 2 full years, plus likely netting for another period of

time, plus months of harvesting. This is a noisome project which has substantial adverse impacts on the public.

- The applicant said that when the planting takes place, other life is not harmed... (other life IS harmed, I would say)...But if it is true the applicant is truly not using the method raking the beach of existing marine life prior to planting, that would be an improvement over previous methods (Note slide with photo showing masses of disposed sand dollars). **If the permit ends up being granted it should be required that the applicant is NOT allowed to clear the beach of other life prior to planting.**
- **Sand Dollars**
 - Is the applicant going to pay its workers carefully move aside acres of sand dollars? Fact: sand dollar nurseries include minuscule sized baby sand dollars- They don't come into the world fully grown! They start out tiny, then grow to the size you often see on the beach. Applicant is not to be relied on to prevent harm to sand dollars.
- Applicant's scientists' presentations of geoduck specific studies are those cited in GARP, or rehashes of them. Not a single study in GARP is evidence that geoduck aquaculture is not harmful. A further serious problem in any of the studies is that the data are collected long before Taylor increased their geoduck acreage to the current over 300 sites, per their presentation, with more under application. The data are old. They predate the ever increasing aquaculture sites.
- Only looking at the charismatic species in studies is unacceptable. There are no studies on the 165 or more interconnected species impacted by this permit.
- We can't justify industrial geoduck aquaculture based on inadequate science.
- **"Experimental? NOT.**
 - applicant references the SMP's directive to get more studies as grounds for the change in nets and equipment and aquaculture methodology. THAT IS NOT what is meant by 'experimental' in the SMP! Applicants are deceiving us in connecting that term to the SMP. Applicants aren't conducting actual impartial research with carefully planned and controlled variables and control group samples... they are making it up as they go.
- **Netting** Applicant said they might have to use netting on the beach if they determine there is 'too much' predation...mis-justifying it as the kind of

'experimental' recommended by SMP. Well, they will use netting because predators include sea lions...and Sea Lions congregate just across the inlet from this site, and swim past it all the time! The applicant says the permit lets them do whatever they decide is necessary get a good harvest because they are being 'experimental. There is absolutely no evidence that whatever method the applicant feels the need to apply will not harm the Sound. As it stands, the applicant would be given a wide open permit- in perpetuity- to do whatever they want to the environment. If this permit is granted, restrictions might be of use-like requiring a review prior to coating the beach with netting.

- Long after GARP, there are still no new data that the environment is not being harmed. Any study cited by the applicants scientist are irrelevant because not a single study was sufficient for generalization to this particular site. Please consider that any study results that are cited are done at a time before Taylor has increased farm area. studies are all out of date, and were never sufficient for generalization to this particular site