

# Thurston County Community Planning & Economic Development Department Staff

SPECIAL MEETING July 24, 2019

## Aquafarms permitting

Thank you for the opportunity to give public comment on land use decisions and shoreline management – these are not easy decisions.

My husband and I live less than a mile from Tolmie State Park. This March (4 months ago) a permit was granted for a 3.6 acre geoduck farm only a 160-feet away from the public beach at Tolmie State Park. Talking with neighbors living on NE 61<sup>st</sup> who strongly opposed this proposal stated that, "Our reality is measured by the fact that 99% of opposed shellfish operations have ultimately been approved."

The proponents of this plan did what was minimally required - informing neighbors within 500 ft of the site. What did not happen was give notice to **Tolmie State Park** visitors. The permit notification was posted at an ambiguous location, hundreds of feet away from the park entrance. As a regular Tolmie walker, I noticed the posting but it's doubtful that anyone but a neighbor of the park would have seen the sign and do the research necessary to fully understand what the permit proposed. A transparent process would have given Tolmie visitors an opportunity for public comment. **Happence or deliberate concealment of permit information?**

I propose 4 actions for the Planning Commission and relevant parties before approving the permits of more commercial shellfish farms:

1. **Slow down the permitting process** to conduct a fact-finding process to determine facts from what may be savvy marketing campaigns for these permits by commercial enterprises who stand to greatly enrich themselves, likely at the cost of adding more plastic particulate matter as well as other pollutants to a fragile ecosystem.
2. **In the interest of true transparency and full disclosure, provide posting that informs users of public lands and parks** of such projects, including the scope and potential risks and provide a comment period to the public – not just for the immediate neighborhood with the 500 ft mandate.
3. **Conduct a thorough and unbiased study of the report completed by the Army Corp of Engineers.** Why hasn't the most recent ACOE Cumulative Impact Analysis NWP48 report of 2017 been released? Shellfish permitting provides for mesh bags and PVC tubes - who monitors and enforces the permit stipulations? For most geoduck farms, tubes are typically installed into the substrate at a density of about 1 tube per square foot or about 42,000 tubes per acre. In the case of the geoduck farm adjacent to Tolmie, there are an estimated 150,000 mesh bags in a 3.6 acre commercial bed inserted into the tide flats 160 ft from the Tolmie beach. What assurances does the public have that best practices maintaining aquafarms are enforced? Who and how often are these practices monitored? **Is the proverbial fox guarding the hen house or is there oversight provided by the Army Corp of Engineers or other appropriate agencies?**

**In August 2018, there was a catastrophic Atlantic salmon net-pen spill by Cooke Aquaculture Pacific at its Cypress Island farm in the San Juan Islands- 263,000 fish were released.** This non-native species are now competing for the same habitat as our native Chinook salmon which is the primary diet for J, K, and L Orca pods. While it was preventable, it was an accidental pen-collapse. **This certainly proves the point that without proper and consistent oversight, aquafarming is endangering Puget Sound.**

What are the financial and physical obligations of mitigating negative results should there be unforeseen or unexpected environment related problems? What are the cost-benefit comparisons of damaging the environment versus benefits to Washington residents sharing the Sound. In most instances 90% of the harvest of geoducks are shipped overseas. **Are we jeopardizing and cannibalizing our natural (and nonrenewable) resources to enrich a few and cater to overseas elite tastes?**

**4. Research the big picture of the cumulative effect of all these beaches being converted from their natural state to industrial geoduck operations.** Before approving more permits, an evaluation of the cumulative effects of all this nearshore habitat degradation and massive amount of PVC and high-density polyethylene plastic pollution has been reviewed. In other words, **connect the dots between commercial aquafarming and the degradation of Puget Sound.**

**Make commercial geoduck farming and other similar commercial enterprises a part of Governor Inslee's orca recovery task force study. The task force is planning longer-term action recommendations for orca recovery and future sustainability.** To date, no cumulative impact studies have been conducted in Washington State to evaluate aquaculture production practices and its impacts on orcas, salmon and forage fish.

There are now extreme concerns about the loss of habitat and its effect on salmon and orcas. Based on the work of the Army Corps this concern is real and undeniable when it comes to geoduck aquaculture and the loss of the natural functions of the tidelands. The unreleased version of the Army Corps Cumulative Impacts Analysis confirms this concern.

**Decision-makers must face the harsh truth - conservation or commerce? If we want both, careful analysis and determinations of threats caused by aquafarming has to be integral to the permitting process of land use and shoreline management.**

**Nothing less than the future of salmon and orcas is at stake. PLEASE PUSH THE PAUSE BUTTON UNTIL ALL OF THE FACTS ARE IN.**

We are in the midst of a crisis in Puget Sound and this is critical information. It is not possible to make a reasoned determination about shellfish farming without all of the most relevant and recent information.

PLEASE - until we know more, let's avoid doing more harm!

I would appreciate being kept abreast of your decisions.

Thank you for your consideration.

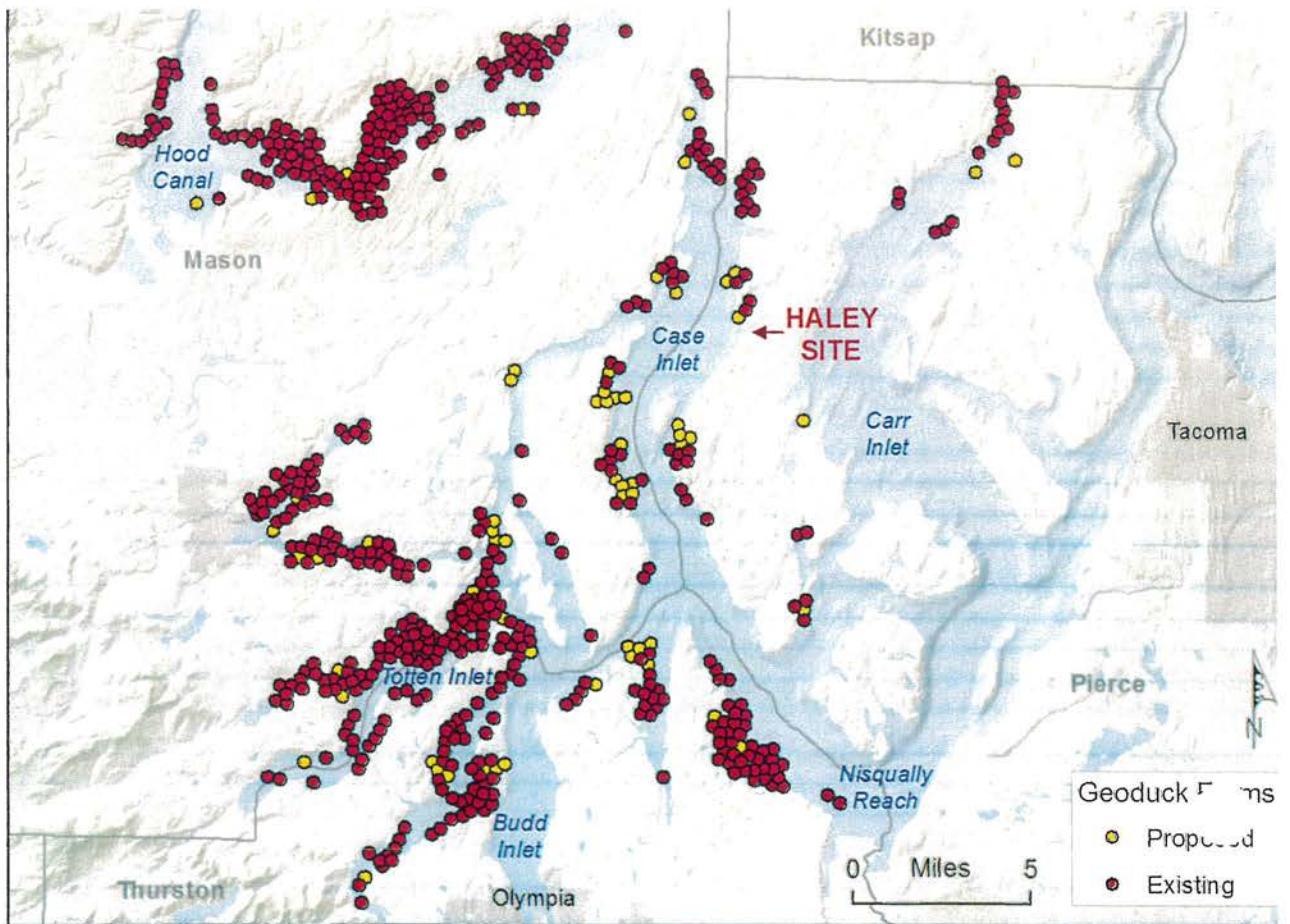


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Enclosure:

Map of cumulative impacts of shellfish farms in South Sound



Known existing and proposed geoduck farm locations in South Puget Sound, totaling 625 in best-available 2012-2014 data