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From: zSMPC
Sent: Friday, January 18, 2013 10:34 AM
To: zSMP
Subject: Comments on section 3.2 (aquaculture) in the SMP draft
Attachments: Aquaculture Chapter Comments.doc

From: Andrew J. Stevenson [REDACTED]
Sent: Monday, January 14, 2013 11:52 AM
To: zSMPC
Subject: Comments on section 3.2 (aquaculture) in the SMP draft

Hi All

Thought others might be interested...

Andy

Aquaculture Chapter Comments – Andrew Stevenson 01-18-13

3.2.2.1 – In the case of net pen aquaculture, sentence 2 “Properly managed, it can result in long-term benefit and can protect the resources and ecology of the shoreline” is not supported by a consensus of wildlife biologists. It should be removed.

3.2.2.3 – County agencies should be added to the list “evaluated and approved by state and federal agencies”.

3.2.2.4 – The sentence “Experimental aquaculture means an aquaculture activity that uses methods or technologies that are unprecedented or unproven in Washington; and/or aquaculture that uses genera that have not previously been regularly cultivated in the state of Washington” should be modified to change genera to species and to reflect cultivation under similar conditions.

The inference here is that previously uncultivated genera pose unknown risks, but that previously uncultivated species belonging to a genera that has some cultivated members do not pose the same risks. There is no scientific or historic basis for such a conclusion. The risk posed by any new cultivated species (or subspecies, or variant, or genetically modified clone) cannot be evaluated based on taxonomy alone.

The original statement also implies that the host environment of cultivation is unimportant in evaluating risk. This is also unsupported by science. Just because steelhead have been successfully raised in fresh water with limited environmental impact is no guarantee that there will also be limited impact in a salt water environment, even if the same “methods or technologies” are employed. The host ecosystems are completely different, and differing impacts are to be expected and need to be tested.

It should be policy that ANY time ANY species is cultivated in a new environment or using a new method, it be considered “experimental”, subject to size and temporal restriction, and subject to increased oversight and monitoring.

3.2.2.5 – There is a supposition in this paragraph that “non-native” species represent a greater threat to the environment than “native”, and that therefore they should be further restricted. This is unproven. Moving a “native” to a different environment can be just as disastrous, as has been demonstrated by Kokanee (considered “native” to Washington) introduction into lakes where they have decimated native fish populations. ALL aquaculture should be strongly encouraged to adopt “zero discharge” methodology.

3.2.2.8 – This should be dropped entirely. One man’s “enhancement” might well be another’s degradation. Rehabilitation by what standard? One might contend that removing invasive Spartina to improve shellfish yields is a good thing, despite a negative effect on forage fish cover. Others might see it otherwise. At a minimum, let’s use ecologic restoration (implying a return to natural conditions) in place of enhancement and rehabilitation.

3.2.3.3 – This is crazy! Change species without review? So I can permit an Atlantic Salmon net pen operation then immediately switch it to a Steelhead farm? With no review as to the impact of that change on native Steelhead streams nearby? Madness! All permit reviews for environmental impact are based on the species under consideration and the proximity and habits of nearby wild fish. This paragraph completely invalidates those reviews! Absolutely not acceptable! If an operator anticipates that a species change

MIGHT be desired during the permit period, then the operator should state that upfront, and the project should be reviewed for ALL species that might be cultured. Otherwise this is plain old “bait and switch”. This is a loophole you could drive a freighter through.

I understand that an operator might wish to change to a “new” variant or genetically modified strain of a particular species under cultivation, but even that change should necessitate some form of review to insure that the original permit investigations are applicable and adequate to characterize the environmental impact of the new stock.

As in sect. 3.2.2.4, simply “cultivate any genera that have not previously been regularly cultivated in Washington” is inadequate to insure “no net loss”. The standard here needs to be any SPECIES not previously regularly cultivated by the same method and in the same environment in Washington.

25% is too great an expansion to allow without review. I think it overly burdensome to require a new permit, but again, a review to insure that the original permit investigations and findings will support an expansion without invalidating them is necessary at levels above 10%.

3.2.3.6c,d,f,i,l,m – There seems to be a consistent effort throughout these sections to minimize and limit the visual impact of aquaculture facilities when viewed from the shore. While this is worthy and proper, exempting moored vessels from these requirements is a glaring loophole. It is a given that net pen facilities along almost all of the Clallam shore will require 24/7 human presence and monitoring, given the remoteness from adequate port facilities. What is the purpose in denying sleeping structures over water when you permit permanently moored vessels? What is the point in limiting structures to 6 feet in height when a permanently moored 4 story housebarge would be allowed? The lack of any meaningful restrictions on size and height of attendant vessels negates the entire purpose. I suggest that transient vessels (those that do not remain moored for more than 18 consecutive hours) be exempted, but that vessels which are permanently or semi-permanently moored to offshore structures be subject to a more restrictive height, color, and lighting standard.

3.2.3.10 – While the cited documents/reports are of value in determining the suitability of in-water finfish aquaculture proposals, they represent a small, and antiquated, subset of the available science surrounding this form of aquaculture. Given the active and ongoing research on the environmental impacts of this method, we should not limit our sources to these documents and “any additional state-approved guidance”. We need to include the “best available science” as a source of guidance. Recent publications (such as the Cohen Commission Report, recent publications by the USGS and NOAA fisheries, and ongoing studies at UW and other academic institutions) represent important information that should also guide our analysis.

While I am sure that commercial interests would like to limit the debate and impose the state approved position on our county, I feel such an approach does not best serve our populace.

3.2.3.10b – A good example of the limitations of the ’86 guidelines. I believe that current industry BMPs would not agree with 20 feet.

3.2.3.10c – As above, too low.

3.2.3.10g - Reported to the State AND the county (see item 2 on my wishlist below)

3.2.3.10i – “and future” needs to be added to the phrase “All existing requirements”. No grandfathering around new regulation or legislation should be allowed. While business needs a predictable regulatory environment to function, we absolutely CANNOT allow methods or practices found to be environmentally damaging to continue just because they were permitted when a CUP was granted.

3.2.3.10l – With State AND county guidance. We need to be consulted here. We have a number of local researchers who have decades of hard data on smolt, juvenile, and forage fish abundance and distribution. Our local tribes also have vast knowledge and science to share. Don’t just leave this to the State.

Things I don’t see, and would like to propose

- 1) One of my biggest concerns with in-water finfish aquaculture in the Strait (I trust nobody would be foolish enough to try it offshore) is the proximity of all available sites to some of the busiest shipping channels in the world. I believe the possibility of a unmoored netpen being swept into the navigation lanes and being run down by a large vessel, potentially interfering with steering and/or propulsion, is sufficient to require assurances from the facility operator that a viable disaster plan exists, and that sufficient resources (vessels, manpower, equipment) are staged to respond to an accidental mooring failure. I believe the county should require this as a condition of use (Could be inserted in 3.2.3.6 after item g, or in 3.2.3.11)
- 2) In addition to an operations plan (3.2.3.11) (forecast) I would like to see an operations report that addresses all the elements of the plan. Both of these documents should be updated by the operator annually
- 3) Viewshed mitigation should be required whenever commercial aquaculture degrades our scenic views. Our natural shoreline views are an important economic asset of our county, and I daresay nobody wants to look at a fish farm in their coastal vista. Operators should be required to compensate the county for the loss of property value (hence taxes) and tourist dollars caused by their visual pollution. Allowing a 2 acre facility 2000 feet of offshore from somebody’s coastal property is a MAJOR intrusion, I’d say
- 4)