

From: Susan Bonner
Sent: Monday, February 23, 2015 10:12 AM
To: zSMP
Subject: Proposed Geoduck Farm

February 22, 2015

Dear Sirs,

As Brandt Point Homeowners we propose designating the mouth of the Dungeness River area as a “no aquaculture zone” for the Shoreline Management Act for the following reasons.

Commercial aquaculture at the mouth of the Dungeness River substantially compromises years of restoration of the Dungeness River.

Current zoning on the Dungeness River designates the property below mile post 2.75 as “*natural designation*”. This zoning specifically requires the area to be “*undeveloped and relatively undisturbed*”, to retain its natural characteristic, and commercial activities are “*prohibited*”. Various governmental agencies have spent over \$11 million dollars in the last couple of years for the restoration of the river. The aim of the restoration is stated to support “*a rich and diverse ecological community that includes more than 250 bird species, 44 species of land mammals, 11 marine mammal species, 10 species of reptiles and amphibians, and 23 species of fish*”. In addition, the SMP 3.2.1.16 specifically addresses the development of aquaculture that would thwart or substantially compromise planned restoration.

A commercial aquaculture operation at the mouth of the river will impact the entire ecology of the area. High pressure hoses used in geoduck farming are placed three feet into the sand to liquefy the area, a substantial change to the environment. Per the U.S. DFW, “*because the ebb and flow of saltwater tides vegetation is scant, leaving algae and invertebrates such as mollusks and marine worms to populate the silty layers. As a result, the mudflats are a popular spot for ducks and shorebirds to forage for food*”. Physically removing this environment so that the area is sterile to plant geoduck is a substantial change to the environment. Juvenile salmon use the eel grass beds to avoid predators yet a current proposal states they will farm the area within 15 feet of the eel grass beds.

Commercial aquaculture adjacent to the Dungeness National Wildlife Refuge will substantially compromise the ecosystem of the inner bay.

This year, the Dungeness National Wildlife Refuge celebrates 100 years of existence. Commercial aquaculture farming will significantly affect the Refuge. Geoduck farming requires the placement of PVC pipes approximately six inches into the sand. The proposed plan for 30 acres of geoduck farming would result in 1,306,800 pipes spread out over several years. With the tidal fluctuations in the bay, the PVC pipes will be exposed on 75% of the days each month. The mouth of the Dungeness River is not protected from the most severe storms experienced along the Strait. These storms come from the east and can vary the sand level along the 3 Crabs Road beaches by 1-2 feet in height in any 24 hour period. During these storm events, sustained winds over 30 mph occur approximately 12 times per year, resulting in the PVC pipes being totally exposed and washed into the inner bay to the protected National Wildlife refuge - damaging the feeding areas of seals, waterfowl, and other marine life.

Per the DFW website, “*one of the greatest threats to the harbor seal population is human disturbance*”. Seals live and breed in the Dungeness Bay and Harbor. The access to this area should not be impeded by a commercial business at the entrance to the Harbor, and disturbing the seals historical feeding grounds. The Wildlife refuge is important to the migration of

birds. For example, *the Black Brant is one of the refuge's most important inhabitants as it depends on the refuge's eelgrass for its survival. The black brant is a true sea goose and is able to drink salt water and eat saltwater plants. Approximately 1,500 brant spend the winter in the area. In March, as a result of migrations, the number of brant increases to a peak of up to 8,000 birds in late April. Most of the brant can be found on the tide flats to the west and east of Graveyard spit (the mouth of the Dungeness River).*

Commercial aquaculture changes the historical use of the mouth of the Dungeness.

The Dungeness River, Dungeness Bay and Dungeness Spit are all named after one of our greatest local resources, the Dungeness crab. Geoduck farming's major predator is the crab. To ensure the largest monetary return for the Geoduck farm, the crabs will be eliminated from a minimum of 30 acres of tidelands. This area has been used by recreational crabbers for years. The mouth of the Dungeness River is a prime kayak area. If commercial aquaculture is permitted at this location, their nets will impede the access of kayaks across the water. There is also significant boat traffic from the public launch in Dungeness Harbor to Dungeness Bay. Aquaculture farming would disturb this historic use of the waters.

Per the website TripAdvisor, the Dungeness Spit is the number one tourist attraction in Sequim resulting in significant revenue to the businesses in Clallam County. Changes to the ecology and aesthetics of the area will impact this natural resource. Aquaculture benefits businesses located outside the county. The Dungeness River, Bay and Spit is a shoreline of statewide significance (9.2) and should be preserved. Please designate the mouth of the Dungeness River as a "no aquaculture zone".

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