



Promoting the protection, conservation and restoration of natural forest ecosystems and their processes on the Olympic Peninsula, including fish and wildlife habitat, and surrounding ecosystems

13 March 2021

Ms. Donna Frostholm, Program Officer
Jefferson County Department of Community Development
Development Review Division
621 Sheridan Street
Port Townsend, WA.
98368
Via electronic email at: dfrostholm@co.jefferson.wa.us

RE: MLA20-00124 Shoreline Conditional Use Application by Skokomish Tribe for 50-acre Aquaculture lease in Dabob Bay

Ms. Frostholm,

The Olympic Forest Coalition is a membership organization working to protect watershed, marine, and forested habitats of the Olympic Peninsula. Thank you for the opportunity to comment. The Shoreline Conditional Use proposal is of concern because of the deteriorating environment in Quilcene and Dabob Bays, Puget Sound and the Salish Sea generally, from cumulative impacts of commercial aquaculture shellfish industry, climate change, and other polluting industries. The Olympic Forest Coalition (OFCO) joins the comments and concerns of residents Mark Knudsen, et al, with regard to the Dabob Bay Natural Areas, and the Olympic Environment Council, with regard to the impacts of plastic structures. OFCO requests that the Department not issue this permit as it is substantially incomplete and not until further information is provided, and joins the request for the Department to hold a public hearing.

OFCO respects the sovereign rights of indigenous peoples, registered and non-registered tribes, including their rights to manage and use natural resources in their traditional and treaty lands. OFCO is grateful for the work of tribes to protect and conserve marine species and anadromous species in marine and land habitats for all our communities, and future generations, in particular the Skokomish Tribe and their efforts to protect the Skokomish River, delta and forested uplands.

MLA20-00124 Shoreline Conditional Use Application comes at a time when Jefferson County, the state of Washington, nor the U.S. government adequately manages nor regulates the existing pollution loads and climate impacts on our marine waters. OFCO members and local citizen scientists have conducted water quality testing in Quilcene and Dabob Bay since 2015. The research indicates alarming trends toward hypoxic conditions in local waters. After repeated requests, testing of water quality in local swimming beaches resulted in those beaches being closed during the 2019 and 2020 summer because of dangerous and poor water quality, a clear indication of local waters reaching dangerous nutrient loads. There is no real, continuous, and verifiable monitoring effort by the County, nor Washington state, to determine if and when we have collectively surpassed the capacity of our marine waters to carry the load of additional commercial shellfish operations. A water quality monitoring program should be included in the project application.

The proposal will raise 6.4 acres of Pacific Oysters and 3.3 acres of Manila Clams, as well as as Pacific and Olympia Oysters, with an additional 1.3 acres of grow out bags. Four acres of *Z. japonica* will be covered with gravel spread with pumped sea water to “create a new habitat.”

The proposal will impact existing eelgrass *Z. japonica*, while buffering native eelgrass beds, delivering out of state gravel to four acres of *Z. japonica* eelgrass by several gravel spreading events to develop manila clam habitat, not a native species. The source of gravel is to be “clean”. Gravel may be an invasive species and disease vector. Jefferson County and Washington state should investigate best practices and require high standards for gravel source in all projects. This information should be included in the permit application.

Scientific data on the costs and benefits of removing existing eel grass while impacting its ecological function is not available in the application. Knudsen, et al point out that:

“The area considered for the proposed lease is rich in biodiversity of plants, animals, fish, and marine life as it exists today, clearly functions as a nursery ground for many species including the emerging and immature herring from the recovering Quilcene Bay Herring stock, and it is unlikely that this project and the intrusive elements that it proposes will be “more conducive to these animals” as the applicant claims. If so, they should provide studies that show how dumping 2500 cubic yards of gravel, covering 3.3 acres with netting, and covering 1.3 acres with oyster bags will improve the ecosystem for the existing species that occupy this shoreline. There is no mitigation proposal or discussion of how the applicant will assure that the spawning and subsequent early growth of these species will be maintained without detriment.”

The Manila clam bed portion of the proposal should be excluded from the permit unless further information is provided and verified, and measures to mitigate impacts are included in the application.

The proposal will allow the operations to use plastic bags, nets, and other structures on the tide flats. These structures may contribute to the plastic loading affecting species in marine waters and may smother existing habitats without mitigation for negative impacts, as pointed out by the Olympic Environment Council. Mitigation measures should be included in the application.

OFCO recognizes and respects tribal sovereignty and efforts to address historic injustice and appreciates the tremendous contribution tribes make to the wellbeing of our environment and rural communities. OFCO would support prioritization of tribal enterprises and natural resources management. OFCO does not support additional commercial operations at this time, especially in partnership with foreign or domestic seafood corporations, which contribute to the environmental degradation of our marine resources and put at risk our environment and public health. OFCO requests that the Department not issue this permit as it is substantially incomplete and not until further information is provided and joins the request for the Department to hold a public hearing.

Sincerely,



Connie Gallant, President
Olympic Forest Coalition