December 11, 2011

To All Parties Interested in the Health of Puget Sound and Salmon Recovery,

The Sierra Club has been requested by numerous organizations to provide our position on Governor Gregoire's Washington Shellfish Initiative that was announced on December 9, 2011 stating the following four objectives:


1. Expanding, promoting and improving shellfish aquaculture in Washington

   - Washington State has more native species listed as endangered than any other state in the USA. We see no mention of the adverse impacts in this initiative on nearshore habitat, birds and juvenile salmon.
   - Governor Gregoire and the various speakers failed to mention that all of the pending shoreline aquaculture applications they want to "streamline" are for industrial geoduck aquaculture, not oysters. Red tape is not what is delaying these applications. It is the fact that industry should not be allowed to site these degrading industrial operations in or directly adjacent to one or more of the following high value ecological habitats: Designated Critical Salmon Habitat, Documented Forage Fish Habitat or Eelgrass beds.
   - According to the press release, "The state of Maryland streamlined its permit process this year by aligning state and federal requirements and developing a single application when growers meet requirements, such as growing areas less than 50 acres." Few aquaculture sites in Washington are larger than 50 acres. As a result, one single application will allow industry to expand one acre at a time with minimal oversight and easy approval. Puget Sound is an estuary of national significance and is not just a coastline in a northern state.
   - Shellfish industry lobbyists who pushed for this expansion are silent on the following three serious threats to our fisheries resources, forage fish, birds and salmon:

1. Shellfish consume fisheries resources (zooplankton--fish/crab eggs and larvae) according to peer reviewed studies. A DNR study documented that forage fish eggs did not just stay buried high on the beach, but were found in the nearshore water column. Continuing to allow expansion of unnatural high densities of filtering shellfish in the intertidal "nursery," puts our fisheries resources at risk.
2. The shellfish growers place tons of plastics into Puget Sound in order to expand aquaculture where it does not naturally grow. Both Charles Moore and Curtis Ebbesmeyer, well known marine plastic debris experts, have publicly stated that the PVC, nets and plastic bands are a serious threat to our marine life. In fact, Captain Moore has recently found that plastics used in the aquaculture industry are now the single largest contributor of marine plastic pollution world wide. Sierra Club is sponsoring Charles Moore's Washington book tour events in Seattle, Olympia, Tacoma, Bellingham and Port Angeles in January 2012.
3. The shellfish industry's Pest Management Plan lists both Japonica eelgrass and native Marina eelgrass as weeds they want to eradicate to improve their profitability. Despite the known environmental benefits for fish and migratory waterfowl, the shellfish industry demanded that the Washington Department of Fish and Wildlife de-list Japonica eelgrass as a protected species and then had the State Weed Board list it as a Class C noxious weed. Industry is preparing to petition Ecology to spray Imazamox in Willapa Bay and Puget Sound which eliminates this valuable vegetation and threatens native eelgrass that grows close by.

4. Mussel rafts are documented to reduce dissolved oxygen essential for fish and are known in Totten Inlet to be covered in invasive tunicates with beggiatoa bacteria found underneath. The only other lease application that has been held is for Taylor Shellfish Totten Inlet 58 mussel rafts (30ft x 30ft) within a 16 acre DNR Aquatic Lands Lease that also will restrict the use of public waters.

2. Increasing opportunities for and improving access to public tidelands for recreational shellfish harvesting

- If our recreational beaches are enhanced with native species for recreational harvesting, that would be a benefit for Washington residents. At the same time this is being promised to citizens, the shellfish industry continues their demand that Peter Goldmark, Commissioner of Public Lands (DNR), lease the best state shorelines to them for geoduck aquaculture eliminating these shorelines for public access.

3. Restoring native shellfish habitat and populations such as the Olympia oyster and pinto abalone

- The Sierra Club supports all efforts to restore native species, but this is a minimal component of this expansion initiative.

4. Improving and protecting water quality to help insure healthy and safe shellfish for consumers

- The sole focus of the need to improve water quality to insure healthy and safe shellfish fails to acknowledge that industrial aquaculture practices degrade the water quality that is essential to sustain life for all of our aquatic species. It is well documented that water quality is being degraded that supports our other aquatic species by aquaculture impacts detailed above in addition to the clearing the tidelands of all natural debris, purging native species that are part of the food web, dredging and liquefying. The following photo link provides insight into citizens concerns: [http://youtu.be/lC1IjM45UbU](http://youtu.be/lC1IjM45UbU)

Litigation

This Shellfish Initiative developed by and for the benefit of one industry attempts to override the efforts of citizens and numerous stakeholders to protect all of our Puget
Sound marine resources. While minimal recreational harvesting is being offered, the end result will restrict the rights of citizens to responsibly enjoy the shorelines. For these reasons, we will continue to support the aquaculture litigation brought by the citizens groups in the Shorelines Hearings Board, the recent legal petition to the Department of Ecology regarding the geoduck rulemaking and federal litigation necessary to protect our native species.

**Other Relevant Information**

News reports have filled the networks with citizens voicing their disgust as corporate special interests are being given priority over the best interest of the public. For this reason, we also feel the following information that was sent to us must be evaluated as another facet of this discussion:

*Taylor Pleads, Gregoire Personal Response, Shellfish Initiative Dec 9, 2011*

*Chris Gregoire Commerce Secretary? Washington Governors Trip Fuels Speculation-Dec 10, 2011*
[http://www.huffingtonpost.com/2009/01/06/chris-gregoire-commerce-s_n_155469.html](http://www.huffingtonpost.com/2009/01/06/chris-gregoire-commerce-s_n_155469.html)

Please join Sierra Club as we stand up to corporate special interests and let them know that Puget Sound is owned by all stakeholders and that the shellfish industry cannot be allowed to get Puget Sound as a Christmas present.

If you have any further questions, please call us or visit our website at:  

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