



9/20/06

People For Puget Sound Policy on Geoduck Intertidal Farming

Context:

Our mission is to protect and restore the health of Puget Sound. We think the fact that Puget Sound is still clean enough—at least in parts—to grow shellfish safe for human consumption is a tremendous asset for our region. We've worked closely with the shellfish industry over the years on our shared interest in clean water, through septic system cleanup, stormwater management, nonpoint source pollution control, and other issues, and most recently they have supported much of our effort with the Puget Sound Partnership. This alliance has been valuable on numerous policy issues that affect the health of the Sound.

We also note that filter feeders like clams, mussels and oysters can contribute to ecosystem health. Restoration of shellfish populations is part of the overall strategy of returning Puget Sound to health. In poorly flushed areas such as Hood Canal, shellfish may in fact be crucial consumers of nutrients. Data from Chesapeake Bay show that a key factor in their ecosystem's decline is the disappearance of their oyster reefs, which once filtered the entire Bay every three to four days before their population crash in the 1950's.

We also recognize there are issues, like those raised about geoduck aquaculture, that need to be addressed to ensure a cautious approach is taken regarding practices where the potential impacts to Puget Sound ecosystem health are unknown. Scientific studies and monitoring need to be funded in order to provide the best information possible about potential impacts, and to provide a basis for determining on a factual basis the appropriate scale and best practices for sustainable geoduck aquaculture in the intertidal zone.

Summary:

The main elements of this policy are that an independent, credible scientific study should be conducted to answer outstanding questions about the impacts of intertidal geoduck aquaculture, that the state DNR should not expand its leasing program until the results of the study are known, and that geoduck farms on private tidelands should be required to obtain permits under the shoreline management act, with mitigation and environmental protections written in.

People For Puget Sound will consider the results of this study and take an annual look at this issue and our policy.

Local governments should:

1. Adopt and promote open space taxation programs that provide financial incentives to private tideland owners for leaving their tidelands in a natural state.
2. Allow intertidal geoduck farming only through shoreline conditional use permits that

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adhere to the Department of Ecology shoreline master program guidelines, and that fully mitigate environmental impacts, such as:

- Include baseline survey of existing habitat proposed for farming
- Enforce local critical areas ordinances and shoreline master programs to ensure no net loss of intertidal ecosystem resources
- Require adequate setbacks from eelgrass and forage fish habitat and limit timing of operations to avoid ecosystem impacts
- Require bonding to cover cleanup and mitigation costs
- Require labeling of nets and pipe to ensure cleanup takes place
- Prohibit use of rubber bands or rebar; modify mesh size to prevent bird entrapment
- Require that permit fees cover the full cost of agency regulatory programs, including permit review, inspections, and enforcement

3. Identify areas appropriate for aquaculture and regulate through shoreline and zoning regulations.

The 2007 legislature should:

Fund a comprehensive, independently developed, scientific study of intertidal geoduck farming, addressing community and ecosystem scale impacts and effectiveness of mitigation measures.

The Washington Department of Ecology should:

Amend the Shoreline Master Program Guidelines to clarify that geoduck farms require local conditional use shoreline substantial development permits and provide technical assistance to local governments to ensure stringent avoidance and mitigation of habitat and ecosystem scale impacts.

The Washington Department of Natural Resources should:

1. Modify the geoduck pilot program as follows:

- a. Comprehensively and independently monitor and analyze all environmental impacts and effectiveness of mitigation measures on intertidal communities/ecosystems and species, such as: benthic and water column effects of planting, predator protection and harvest, and associated effects of differing planting densities;
- b. Include scientific analyses of several control sites where aquaculture has not historically occurred, and in accordance with professional scientific methods;
- c. Remove any areas of cultivation in forage fish spawning and rearing; and
- d. Limit the expansion of intertidal geoduck aquaculture on state tidelands to 25 acres until the independent, scientific study of environmental impacts and effectiveness of mitigation measures is completed. (The local shoreline conditional use permit requirement and full mitigation of impacts described on the previous page should apply to the state tidelands pilot project).

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2. Ensure the habitat conservation plan for state tidelands fully researches the environmental impacts of geoduck and other aquaculture and requires full mitigation for both subtidal and intertidal ecosystems

The U.S. Army Corps of Engineers should:

Prepare a regional general permit that comprehensively addresses and mitigates local and ecosystem scale impacts, incorporating information and recommendations from other Puget Sound efforts, such as: The Governor's Puget Sound Partnership; the Puget Sound Nearshore Project; the Draft Puget Sound Salmon Recovery Plan; and, the Puget Sound Action Team's Puget Sound Conservation and Recovery Plan.

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