

**PIERCE COUNTY  
PLANNING AND LAND SERVICES DEPARTMENT  
RESOURCE MANAGEMENT**

MEMORANDUM

DATE: August 28, 2008

TO: John Dohrmann  
Department of Ecology

FROM: Dave Risvold, Environmental Biologist III, Pierce County Resource Management

SUBJECT: Partial Comments on “Guidelines for Intertidal and Subtidal Geoduck Aquaculture”

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These comments only cover a portion (about half) of the Powerpoint presentation. I will provide the remainder as soon as I can. My comments are provided in the same order as the Powerpoint plates and captioned accordingly

**Plate 4 “Zoning for Geoduck Aquaculture”**

I don’t think we should focus on where aquaculture should be allowed. I feel we should identify where aquaculture simply should not be allowed. Months ago we had a presentation from Doug Myers, the Director of Science for People for Puget Sound. In response to a question about what he would like to see in the way of shoreline protection, Doug noted that (to paraphrase) he would like to see no development along shorelines located within a certain distance from key natal estuaries. The distance was on the order of miles.

I would like us to identify those chunks of shoreline that can be demonstrated to provide irreplaceable ecological functions and simply not allow aquaculture. Estuarine areas adjacent to salmon bearing streams might be one of these areas.

**Plate 9 “New Zoning Guideline Options” and 11 “Geoduck Aquaculture “Zoning” Criteria”.**

Similar to previous comments, I oppose the creation of aquatic designations or overlays that indicate where geoduck aquaculture may be allowed and would rather identify areas where geoduck aquaculture is not allowed. Outside of these areas, I think a property owner should be able to propose geoduck aquaculture where site conditions are amenable to such activity

**Plate 13 “Recurring Alternatives”**

I would like to see DOE provide specific recommendations. Ranges are acceptable as is reference to existing Best Available Science documents such as: “Protecting Nearshore Habitat and Functions in Puget Sound, An Interim Guide”.

**Plate 14 “Siting Requirements”**

I see only two “siting” requirements. One would be that the proposed site is not within shorelines that provide “irreplaceable ecological functions” (or similar language), i.e. areas where a jurisdiction decides aquaculture will not be allowed. The other is that aquaculture must be sited within areas that, *in an unaltered state*, provide suitable substrate and water quality to support aquaculture operations. The point being, one can’t impact an area simply to make it appropriate for aquaculture.

Most of the bullet items listed under “Siting Requirements” more appropriately belong under “Design and Operation” because, as I see it, once an applicant determines that their proposed site is suitable without alteration and not within a “no aquaculture” area, they then have to demonstrate that it can be designed and operated without impacting regulated features.