

February 8, 2008

Recommendations for SARC Land Use Topics

Save Our Shoreline organized in 2004 and is made up of shoreline property owners and recreational users concerned with geoduck farm operations.

We believe that proper siting of aquaculture away from sensitive areas, recreational and residential uses will mitigate most conflicts. This can be done through zoning or designating areas that have little social or environmental impact. Recommendations for policies then could pertain to operations inside these zones, or if the local jurisdictions choose not to zone or district, they would be for areas that would impact neighbors.

We endorse the Pierce County Interim Regulations for policy on items below. More specific to your agenda:

- **Aesthetics:** Districting would be the best solution. The farms cannot be made pleasing to those who value views or a peaceful home environment.
 - Work boats should not be moored on-site for longer than the particular operation (planting or harvesting) when in view corridors.
- **Artificial lights:** Shielded headlamps only with a maximum number allowed. (Mason County recent decision says 5.)
- **Noise:** Baffled engines and State Noise Standards.
- **Hours of Operation:** 8:30 AM to 4:30 PM no Sunday's or State Holidays. Pierce County Shoreline Substantial Development Permit: Case No. SD10-05 of Aquaduck LLC/Roland, on January 20, 2006, The Hearing examiner conclusion was on condition "H" "Hours of operation shall be limited to Monday through Friday 8:00 AM to 5 PM. There shall be no work on holidays." There was no appeal of this condition, and at the hearing, the geoduck farmer offered to dive during the day for the harvest activity to minimize impacts on the neighbors. This was a small operator.
- **Debris and Litter:** Baseline study would include currents, wind direction and likely places debris would accumulate. Local knowledge of where these areas are could be sought. As well as bonding, harvest will not be granted if all gear is not cleared on site or off site. Areas that are a continual problem due to currents or other factors that generate escapement should be discontinued through adaptive management as suggested under "Adaptive management".
- **Navigation and Public Access:** If access is allowed from uplands, and the road is private with several owners, permission to use the road for non-residential use must be in writing from each owner. Notification of the exact nature of the use will include how many vehicles, how often and what hours workers will be present must be included. Compensation to the community for wear and tear and damage is the responsibility of the operator. (Most road agreements did not anticipate non-residential use of their roads). A community can deny use of their private road.
 - Public access to farm areas should be perpendicular and parallel paths to the water. Perpendicular paths should be large enough to drag a boat through should the tide go out leaving a boat stranded. Paths should also be made wide around eelgrass areas to prevent employee and public trampling.

Save Our Shoreline!

Working together to preserve our beaches

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- **Landowner Notification:** Notification of new farms should be within the debris control patrolling areas. In Pierce County, the patrol area is ½ mile on each side of the farm.
 - 3 residential properties on each side of the site must be informed of upcoming harvest activities at least 5 days in advance. (Size of lots can vary, going by residential lots instead of a footage will make the notification fair.)
- **Site Identification:** Markers and buoy anchors should be embedded in the bottom with non harmful (won't protrude like a piece of metal) markers such as chain or line for safety reasons.
- **Maintenance Requirements:** Hoses from pump barges to the harvest site should not be allowed to drag over eelgrass beds between the two.
 - Company should provide interpreter and materials for non-English speaking employees for standardized training programs.
 - Employees' animals are prohibited using the beach, adjacent uplands or waters for defecating.
- **Bonding:** At least \$1.00 a tube. This number reflects what it cost to clean up a Pierce County farm and does not take into consideration the large amount of volunteer help.
- **Record Keeping:** "Records and Logs" posted to a website for public review. This includes complaints.
- **Adaptive management:** Instead of a 5 year review: The local jurisdiction permitting and review process would establish acceptable limits of probable impacts that would allow projects to be implemented. The project would need to show proof of meeting those parameters, initially, through submittal of baseline studies and projections and, as the project is in place, through periodic submittal of environmental studies and performance reviews. The permit would state terms of performance and obligations and include terms under which the permit may be reviewed or revoked.¹ This would include land use issues as well as environmental. Precautionary Principle should be the standard for environmental safeguarding.
- **Surveys:** Baseline study would include currents, wind direction and likely places debris would accumulate.
- **Performance Measures:**
- **Siting Tools:** We recommend either updating or creating a new Aquaculture siting study to have a more comprehensive way to review aquaculture siting that is done in tidal areas. This tool was used to site floating aquaculture, and it's principles could be expanded to other types of seabed aquaculture.

¹ In part, taken from Aquaculture Siting Study, State of Washington Department of Ecology, EDAW Inc., CH2m/Hill, October 1986
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