

To: Department of Ecology – Cedar Bouta
Subject: Comment Shoreline Master Plan revisions

From: Don Gillies
6931 US Hwy. 101
South Bend, WA 98586

To Cedar Bouta,

It is with a sad heart I read the language changes proposed in the Shoreline Master Plan. Not only are the proposed changes a departure from the legislative intent of SB2200 but they are out of step with SARC recommendations. Ignoring the reasons shellfish are singled out and treated differently, with respect to Shoreline Master Plans, is a mistake in judgement and a slap in the face to knowledgeable people wanting to protect the shorelines of Washington State. Of all agencies, the Department of Ecology should know why all shellfish are protected with recognition as critical saltwater habitat, priority water dependent use designation and recognized to be of statewide significance. It is with great disappointment I see protective language related to these three items removed and/or altered in the draft rule changes. Please do the right thing and make only those changes recommended by the SARC committee. As a member of the shellfish industry I tried to follow the long drawn out SARC committee process and although I didn't agree with everything put forth I felt I could live with what came out of that process.

I fear if DOE's proposed language changes become the basis for local government's shoreline master plans it will be the demise of our family's shellfish farm. Shellfish (natural, commercial, recreational and subsistence) depend on good water quality for survival. Without the current language protecting shellfish, county shoreline master plans will systematically erode those things most important to our 150-year-old family business; water quality and conflicting use. Our family business has plans to diversify into a value added oyster product (a significant investment to say the least) and will need a modest water dependent use facility. During the development of Shoreline Master Plans, local jurisdictions could use DOE's draft rules to effectively limit reduce or deny shellfish industry expansions like this. The delays, the cost and the time it takes to fight through the permitting process now are hard enough. With DOE's proposed rule changes any shellfish business would reconsider expansion. A shellfish business is exactly the type of business you want on and near the water, we take care of it, we protect it and we watch over it. When it comes to protecting the waters along Washington's coastline shellfish growers are your allies. If your goal is to protect the waters of Washington State you are moving in the wrong direction. DOE is making rules that are detrimental to our waters while opening the door for county planning commissions to cave into development pressures. The benefits shellfish provide to the marine environment will help ecology protect the salt waters of Washington State and improve the health of estuaries in which they grow. Do you want water quality in the state to mimic Hood Canal, Bainbridge Island, Tacoma, Olympia, and Seattle? Will you sacrifice the shellfish of Washington State for another shoreline development with 150 homes, a restaurant displacing necessary support facilities, a kayaker that has to paddle around a workboat? The legislature recognizes the importance of shellfish to the state of Washington. It is special and should be treated that way.

I am aware that geoduck farming has become a hot button in Puget Sound. As an emerging industry with some issues to work out I would expect Shoreline Master Plans to address them. SB 2200 set up the SARC committee to work out these issues and it is my opinion that DOE should incorporate SARC recommendations to address these geoduck specific issues.

Let me just add that your small business economic impact statement is a joke. How can DOE call such an inadequate document official?

Don Gillies
Stony Point Oyster Co. L.L.C.
6931 US Hwy. 101
South Bend, WA 98586
360-875-9964