From: john lacy
To: ECY RE Shoreline Rule;
Subject: Comments on proposed change of rule: WAC 173-26 E0032
Date: Tuesday, November 23, 2010 3:46:23 PM

The proposed rule change placing shellfish aquaculture in the same category of all other uses is not congruent with either Washington State History or sound ecological science. The shellfish industry can only operate where the ecosystem conditions favor clean water, shellfish further clean the water and in fact viable commercial shellfish farms are found in the majority of healthy salmon ecosystems.

Your proposed changes make it appear that shellfish farming is contradictory to endangered species ecosystems and that is not true. Jefferson County Washington has designated their entire shoreline as critical habitat to endangered species. Jefferson County is also home to the two largest shellfish hatcheries on the West Coast and is a critical source of shellfish seed to the entire Pacific Rim Shellfish business. Given the impact of ocean acidification, oysters are no longer spawning in the wild and only hatchery seed is sustaining this industry.

Your proposed rule change as it impacts Jefferson County could make all shellfish farming in conflict with critical habitat ! Do you really intend that as the result of your proposed rule change ?

I urge you to retain the initial language that recognized the special nature of shellfish aquaculture, it is both a critical and key component of critical habitat and a use of the habitat.

Sincerely,

John P. Lacy