

2/1/2014

Public Comment Form

non-native eelgrass

Name:

Paul Philpot, exec dir

Representing:

Pacific Co. EDC, 211 Commercial St, 98577

Date:

Feb. 1, 2014

Comments: Due to the significant impact of marine industries in Pacific Co., in terms of both employment and their annual sales, the Pacific Co. EDC supports programs, studies, and the use of products that provide our marine industries with the opportunity to continue to operate in a manner that generates a reasonable profit, generating revenue that turns over within the local economy, and maintains jobs for residents of our county and the surrounding area. [over 1000 jobs, \$150 million in sales]

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borrowing
shrimp

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DON'T WASTE WILLAPA WILDLIFE-DRAFT NPDES UNSAT

Waterfowl and Salmon would bear the brunt

SMA-shoreline management act- Willapa Bay is a shoreline of statewide significance**

Flawed Process*

Flawed Result (DRAFT EIS and NPDES)

All Major Incorporated Inputs by Industry Acolytes*

WA State Noxious Weed Control Board

Dept of Ecology authors from Ag Dept

Ag extension agent and applicant as fact and conclusion checkers

Inputs from WDFW, DNR(natural resources), citizens, Washington Waterfowl organization ignored

Impacts on Salmon omitted, but obvious. SMOLT HABITAT!

This team as constituted not capable of fixing the flaws---CANNOT SELF-REPAIR

Drafts need a redo--not patchable-- Albert Einstein quote- "A problem cannot be solved through the conscience that created it". Expand this or drop it.

The unbalanced approach of the SMA means **Willapa would become just a Shoreline of Pacific County Aquaculture, including Public tideland

~~Wildlife Conservation~~

~~Cumulative Effects~~

MISSING!

~~Public Interest~~

Fatal Flaws

1. Pacific Brant Wintering Grounds to be sprayed
2. Pacific Brant Spring Staging Grounds/mating grounds to be sprayed while birds are present
3. Preferred chum salmon habitat to be sprayed while smolts are present
4. No critical locations protected, public or private
5. No collateral damage prevention to native eelgrass, a protected vegetation
6. Ratcheting back of native eelgrass encouraged, no pre spartina baseline developed, no net loss? no checks!
7. Connectivity for smolts from spawning streams ignored---no buffers, public or private
8. "duckgrass" denied as a major waterfowl forage, when it has been demonstrated repeatedly otherwise
9. Misleading statements used as justification for the unjustifiable ie " no mallards from the refuge had any zostera japonica(duckgrass) in them"
10. No Environmental Monitoring included--no baseline for habitat or fauna that inhabits it, no periodic measurements, no goals or alarm points, no corrective action specified when reached (will not know), even for species seldom meeting management goals
11. Loss of carrying capacity for many species, including listed green sturgeon, unestimated, unmeasured before spraying, unlimited by precautions or checks, and totally deniable afterwards.
12. Definition of controllable areas expands them-possible 75% to 90% or more of tidelands, public and private.

RP Barhlurst

2/1/14

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