

**From:** [Dave Risvold](#)  
**To:** [Scott Sissons](#); [Adonais Clark](#); [Kathleen Larrabee](#)  
**Subject:** RE: Shoreline Substantial Development Permit:SD9-11  
**Date:** Tuesday, April 03, 2012 11:31:00 AM

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as we discussed, it'd be tough

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**From:** Scott Sissons  
**Sent:** Wednesday, March 28, 2012 2:58 PM  
**To:** Adonais Clark; Dave Risvold; Kathleen Larrabee  
**Subject:** FW: Shoreline Substantial Development Permit:SD9-11

more from WDFW.....can we prohibit the installation of netting?

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**From:** Waldbillig, Chris M (DFW) [<mailto:Chris.Waldbillig@dfw.wa.gov>]  
**Sent:** Wednesday, March 28, 2012 2:49 PM  
**To:** Scott Sissons  
**Subject:** RE: Shoreline Substantial Development Permit:SD9-11

Scott,

If the county were to impose timing restrictions, I would look at the typical juvenile salmonids windows we have in place and particularly the earliest component of those windows. Maybe even a little earlier, the idea being to protect the most vulnerable. Maybe look at timing windows that restrict work February 15 through May 31, or somewhere along those lines. I would not be as concerned with seeding, so much as harvesting. And for goodness sake try to get them to avoid clam predator netting. That stuff alters habitat more than you could imagine, ends up washed all around the beach, just bad stuff, we do not use on our public shell fish beaches any longer.

Chris Waldbillig  
WDFW Marine Area Habitat Biologist  
360-874-7258 Office  
360-480-8128 Cell

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**From:** Scott Sissons [<mailto:ssisson@co.pierce.wa.us>]  
**Sent:** Wednesday, March 28, 2012 2:40 PM  
**To:** Waldbillig, Chris M (DFW)  
**Subject:** RE: Shoreline Substantial Development Permit:SD9-11

Thanks for this information Chris. I really do appreciate it. If the County were to require timing restrictions for clam and oyster operations (seeding, harvesting, etc.) to protect salmonids that utilize Dutcher Creek and the estuary itself what would the WDFW recommend? Thanks again, Scott

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**From:** Waldbillig, Chris M (DFW) [<mailto:Chris.Waldbillig@dfw.wa.gov>]  
**Sent:** Wednesday, March 28, 2012 11:25 AM  
**To:** Scott Sissons  
**Subject:** RE: Shoreline Substantial Development Permit:SD9-11

Scott,

I can provide a few general comments that may or may not be helpful for your review;

Generally aquaculture and juvenile salmon habitat do not go hand in hand. Aquaculture often involves multiple manipulations of natural habitat forming processes to maximize profits and growing conditions. Dredging, dikes, predator netting, clam tubes, end equipment related issues are all aspects of the aquaculture industry and are done with no regard for timing windows and ecological processes. For example recent research focused around Geoduck have demonstrated that a short duration of noticeable change occurs for prey resources around geoduck harvesting, this may not be that big of deal unless the geoduck are harvested around the same time that juvenile salmon are transitioning/smolting in the near shore and need those prey resources to grow. Generally you can substitute clam culture and geoduck culture as having similar impacts.

Aquaculture can change habitats from mud flats to gravel, adding aquaculture gear changes the habitat complexities and may displace some fish while attracting others. For example, clam tubes tend to displace flat fish and increase crab presence and predators which could have impacts to juvenile salmonids. Finally, once an aquaculture facility is started it has very little regulation from WDFW and other regulatory agencies. Habitat can be changed, eliminated, and chemicals applied for without controls.

I do not know much about Dutcher's Creek, it is a fish stream and is listed as having coho/cutthroat and the area looks to be a perfect low energy rearing area for juvenile fish. Much of the area appears to be potential forage fish spawning areas as well.

Chris Waldbillig  
WDFW Marine Area Habitat Biologist  
360-874-7258 Office  
360-480-8128 Cell

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**From:** Scott Sissons [<mailto:ssisson@co.pierce.wa.us>]  
**Sent:** Tuesday, March 27, 2012 10:17 AM  
**To:** Waldbillig, Chris M (DFW)  
**Subject:** RE: Shoreline Substantial Development Permit:SD9-11

Good Morning Chris: I realize that the WDFW does not regulate the aquaculture industry through the hydraulic code, but do you as a marine biologist have any concerns with potential impacts to salmonids given that this proposal lies within Dutcher Cove and the documented coho/cutthroat bearing stream of Dutcher Creek? Fall chum are a potential presence and chinook may use the estuarine area. What is the timing of fish migration to and from Dutcher Creek anyway?

If you can't comment I fully understand. Thanks, Scott

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**From:** Scott Sissons  
**Sent:** Tuesday, March 13, 2012 11:26 AM  
**To:** 'Waldbillig, Chris M (DFW)'  
**Subject:** RE: Shoreline Substantial Development Permit:SD9-11

Thanks Chris. Sincerely, Scott

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**From:** Waldbillig, Chris M (DFW) [<mailto:Chris.Waldbillig@dfw.wa.gov>]  
**Sent:** Tuesday, March 13, 2012 11:07 AM  
**To:** Scott Sissons  
**Cc:** Kathleen Larrabee; Dave Risvold; Adonais Clark  
**Subject:** RE: Shoreline Substantial Development Permit:SD9-11

Scott,

WDFW does not regulate the aquaculture industry through the hydraulic code, however our shellfish program did send the following comment.

I don't typically comment on these but in regards to Olympia oysters what the applicant is proposing to do would not re-establish native oysters at that location. Nor would it contribute to native oyster restoration. It would simply be no different than cultivation of Pacific oysters in that regard and should be treated as such in regards to any permitting.

Thanks,

Chris Waldbillig  
WDFW Marine Area Habitat Biologist  
360-874-7258 Office  
360-480-8128 Cell

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**From:** Scott Sissons [<mailto:ssisson@co.pierce.wa.us>]  
**Sent:** Friday, March 09, 2012 9:57 AM  
**To:** Waldbillig, Chris M (DFW)  
**Cc:** Kathleen Larrabee; Dave Risvold; Adonais Clark  
**Subject:** Shoreline Substantial Development Permit:SD9-11

Hi Chris: The attached Notice of Application was sent to you folks (Bill Rehe) on November 4, 2011 for an applicant that is requesting a Shoreline Substantial Development Permit to cultivate, harvest and transport shellfish (manila clams/Olympia oysters). I don't believe that we received any response and were wondering if you/WDFW had any comment/concerns with this proposal? The parcels are located in Dutchers Cove on the Key Peninsula.....If the WDFW has any input/comments/concerns they would be greatly appreciated. Sincerely, Scott

*Scott R. Sissons  
Environmental Biologist 3, PWS  
Pierce County Planning and Land Services  
2401 South 35th St., Suite 175  
Tacoma, WA 98409-7490*

[ssisson@co.pierce.wa.us](mailto:ssisson@co.pierce.wa.us)  
Work (253) 798-2758

*FAX (253) 798-3680*

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