



Cascade Chapter

180 Nickerson St, Ste 202

Seattle, WA 98109

Phone: (206) 378-0114

Fax: (206) 378-0034

www.cascade.sierraclub.org

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Dear Officials, Legislators, Environmental Caucus, Scientists and Concerned Citizens:

The Sierra Club has been asked to clarify our position regarding the issue of shoreline modifications, regulations and science for Puget Sound shorelines in response to the widely circulated report by Dr. Don Flora as discussed in the story titled "Scientists Critical of Bainbridge Man's Report on Shoreline" published in the Kitsap Sun¹.

We agree with the fourteen scientists that authored the rebuttal letter that a "reasonable standard for scientific rigor or credibility" is necessary for a rigorous scientific evaluation of the effects of human activity on the ecological condition of Puget Sound shorelines.

Our primary concern is the discontinuity between "standard for scientific rigor" used to assess information presented by the shellfish industry supporting their activities in the Nearshore and the standard for studies presented by Nearshore resource protection proponents regarding those activities. For example, the National Marine Fisheries Service (NMFS) biologic opinion on the Army Corps of Engineers Nationwide Permit 48 is being used by industry to justify current aquaculture operations and expansion, but is predicated on data that was not subject to "rigorous scientific" review. In many cases, the Army Corps Biological Assessment and NMFS biologic opinion are based on information that has not been independently peer reviewed and too often only cites research that point out the positive aspects of aquaculture. Most of the geoduck data was assembled by a commercial geoduck farm owner and operator and a paid consultant for by the State's largest shellfish company (Taylor Shellfish). Much of the specific science and expert opinion relevant to Puget Sound was excluded from both the Army Corps Biological Assessment and the NMFS opinion.

If the desired outcome is to protect and restore Puget Sound for future generations, we cannot allow one scientific standard to be applied to uplands and beaches and a very different, and a significantly lower scientific standard, for Nearshore modifications. Activities in both vicinities are integrally connected to shoreline environmental functions. Industrial aquaculture expansion, the most direct modification of the Nearshore environment, must be evaluated for the full range of impacts it poses to shoreline functions in developing appropriate regulations for its operations and locations. Restrictions are appropriate for all activities with the potential to negatively impact the Nearshore environment, including the aquaculture industry, that are based on sound science, which, as described by the scientists who signed the rebuttal letter, relies upon accepted standards.

We look forward to working with all interested parties on developing adequately protective standards that our shoreline areas deserve, both the uplands and tidelands. We anticipate that restrictions based on sound science will accomplish protection and restoration of Puget Sound, that is not only important to citizens of Washington, but is considered an estuary of national significance².

Sincerely,

Laura Hendricks, Chair
Shoreline and Aquaculture Sub-committee
Sierra Club, Cascade Chapter

¹ <http://www.kitsapsun.com/news/2010/jan/13/scientists-critical-of-bainbridge-mans-report-on/>

² <http://yosemite.epa.gov/r10/ECOCOMM.NSF/Watershed+Collaboration/NEP>