



June 3, 2010

Bridget Moran
Deputy Supervisor, Aquatics & Agency Resources
Washington State Department of Natural Resources
P.O. Box 47001
Olympia, WA 98504-7001

Re: DNR Geoduck Forum

Dear Ms. Moran,

A number of shellfish growers followed the recent 5-day online DNR Forum regarding "Geoduck Aquaculture on State-Owned Tidelands," with great interest. Like your agency, we hoped to gain some insight and understanding into public perceptions of geoduck aquaculture. Unfortunately, in our opinion the data seems to show what we already know: that opposition to aquaculture in Puget Sound is a conflict use issue driven by a small group of shoreline property owners. We arrived at this conclusion through an analysis of the comments and would like to share that analysis with you as part of the record.

In a press release dated April 22, 2010 (STATE DNR LAUNCHES WEB-BASED FORUM FOR PUBLIC DIALOG "Geoduck aquaculture on state tidelands" is first online conversation set for May 3 to May 7) the stated goal of the public dialogue was to *"engage a broad range of people including scientific, aquaculture, environmental, tribal, and other interested residents of Washington State to hear what people think about the potential of geoduck aquaculture on state-owned tidelands."* We note that members of the broader scientific, environmental and tribal communities did not engage in the dialogue. We are curious about the lack of broader interest group engagement in this issue and would like to investigate that further.

In spite of good intentions and efforts, a broad range of people in this first public dialogue were absent. Who, then, did engage in the DNR public dialogue about geoduck aquaculture on state tidelands? Our analysis showed that 81 different individuals made comments during the 5-day forum: 56 were opposed to geoduck aquaculture on state tidelands, 18 were in favor of geoduck aquaculture on state tidelands, 1 was unknown, and 6 were neutral on the topic of geoduck aquaculture on state tidelands.

Significantly, 60% of the comments that were opposed to geoduck aquaculture on state tidelands were posted by a fixed, and unwavering in their views, group of 7 individuals all of whom form the core opposition group to geoduck aquaculture in Puget Sound. In spite of the great efforts by this group, including a public notice to their claimed base of hundreds to "comment about geoduck feedlots" and to "please tell your neighbors" about the DNR forum, the broader public did not engage in the DNR public dialogue on the issue.

Additionally, nearly 80% of the 56 individuals who posted comments opposed to geoduck farming on state tidelands, including the committed 7, are individuals who live in waterfront homes next to an existing or proposed shellfish farm. Clearly, shoreline owners who

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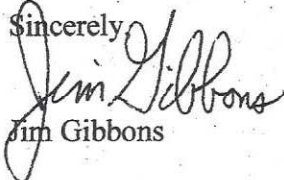
live next to an existing or proposed shellfish farm are those most impacted by the farm activities related to the operation of a shellfish farm. However, this base of shoreline owner opposition to geoduck farming, combined with an apparent lack of interest in the issue by the general public, strongly suggests that the geoduck farming controversy is fundamentally a use conflict issue driven primarily by aesthetics; the concerns are not related to the environment and the health of Puget Sound as opponents suggest.

In summary, the absence of participation from the general public demonstrates a lack of interest in this issue by the public at large. Instead, the same small group of opponents, seemingly concerned with the effects of shellfish aquaculture on their views, continues to dominate the dialogue on geoduck farming.

However, we remain very interested in exploring this issue and are considering commissioning an independent, third-party public survey to measure the general public perceptions of geoduck aquaculture. If we choose to proceed with a public survey, we hope that DNR staff would work with us on the content of the questions to help ensure that the survey of the broader public would be a true test of public opinion and would generate useful data for both shellfish farmers and the DNR.

We look forward to discussing this with you further once we've made our decision on whether to proceed with a public survey.

Sincerely,



Jim Gibbons

cc: Senator Karen Fraser
Senator Tim Sheldon
Rep. Kathy Haigh
Senator Ken Jacobsen
Senator Dan Swecker
Ted Sturdevant, Director DOE
Commissioner Cathy Wolfe
Commissioner Sandra Romero
Commissioner Karen Valenzuela
Gordon White, DOE
Commissioner Lynda Ring Erickson
Commissioner Ross Gallagher
David Dicks, Puget Sound Partnership
Bob Nichols
Senator Phil Rockefeller
Senator Brian Hatfield
Rep. Brian Blake
Rep. Dean Takko
Kathy Fletcher
Senator Kevin Ranker
Senator Steve Hobbs