



*"Promoting Birding and Conservation as Community Educators,
Volunteers, and Stewards"*
P.O Box 502 Sequim, WA 98382

July 23, 2017

Mary Ellen Winborn, Director
Clallam County DCD
223 E. 4th St. Suite 5
Port Angeles, WA 98362
Comments sent by email to dcdplan@co.clallam.wa.us

RE: Comments on proposed MDNS for project Legal No.766276

Dear Ms. Winborn,

Olympic Peninsula Audubon Society (OPAS) appreciates the opportunity to comment and asks that you consider our comments concerning the Cooke Aquaculture Pacific LLC (formerly American Gold Seafoods) proposal to build a new in-water salmon net pen facility 1.5 miles east and north of their current net pen facility located in the Port Angeles harbor.

We oppose the proposed permit application for an in-water salmon net pen facility in the Strait of Juan de Fuca. We arrive at our opposition for the following reasons:

1. The siting of the proposed new facility opens the potential for increased occurrences of adverse ecological consequences for bird and marine life. This area of the Strait of Juan de Fuca is documented to be a very high-energy open coastal environment with severe currents, wind, and high wave action. There is an elevated risk for failure of floating net pen structures under these conditions. Should failure occur, disease, antibiotic pollution, parasites, and debris pollution will spill directly into the Strait of Juan de Fuca and be deposited along fragile seabeds and shorelines. This location, offshore of the Morse Creek mouth, is documented to be a major migratory corridor for salmon, forage fish, birds, and marine mammals.
2. The Dungeness National Wildlife Refuge (DNWR), one of the nation's most important wintering littorals for migratory waterfowl, and a key nesting shoreline for shorebirds and water birds is located approximately 7 miles east of the proposed net pen site. The proposed site is in direct line of the prevailing offshore currents that flow east from the mouth of the Strait of Juan de Fuca. The applicant has not included an adaptive management plan in the instance of a structural failure of their system that will surely impact the DNWR and the wildlife and the waters surrounding it.
3. Net pens concentrate and propagate parasites and disease, which can adversely infect native stocks of salmon, as well as for forage fish. For seabirds and other marine species, healthy fish stocks and protected breeding areas are key components necessary for healthy populations. Scientific [evidence](#)

suggests that seabird breeding success declines when forage fish populations drop below a third of their maximum long-term biomass. Audubon Washington reports that the number of marine birds wintering in the Salish Sea has [declined significantly](#) since formal surveys began 35 years ago and migratory, fish-eating birds such as Western Grebes appear to be at the greatest risk for increased decline. In U.S. waters, overwintering marine bird populations have [decreased by up to 50%](#) since 1980 and 14 of the 37 most common overwintering species are considered to be in significant decline. In British Columbia waters, 22 of 57 species assessed show [significantly declining trends](#) for the 1999-2011 period.

4. Critically endangered and declining salmon and forage fish species are found in the proposed net pen location. In addition, the endangered Marbled Murrelet depends on forage fish to survive with sand lance having been identified as a major portion of their diet.

While we understand the economic and employment opportunities offered by this form of aquaculture, we also offer that the public waters and the risk to such should not be overlooked. We respectfully request the applicant carefully consider a redesigned closed aquaculture system located over land and that the existing net pens should be removed from Port Angeles Harbor. Upland aquaculture systems are technologically improved, provide environmental safeguards, effluent can be monitored and treated as needed before being discharged into seawaters, would be built on privately held lands, and are proven to be economically viable.

We further recommend that Clallam County should limit aquaculture net pens to upland facilities and ban net pens from its shorelines in the Shoreline Master Program update.

Sincerely,

Bob Phreaner
President
Olympic Peninsula Audubon Society