



Friends *of the* San Juans

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TO: WA Department of Ecology

SUBJECT: Comments on Draft guidance for marine net pen aquaculture for Washington State

DATE: August 3, 2021

FROM: Tina Whitman, Science Director

Friends of the San Juans respectfully provides the following high level comments on the recently released Draft guidance for marine net pen aquaculture for Washington State (Draft guidance). In addition, we fully support the detailed comments submitted by the Our Sound, Our Salmon coalition. Friends of the San Juans represents thousands of members and works with diverse stakeholders, including citizens, committees, tribal and governmental agencies, and other nonprofit organizations in the transboundary region of the Salish Sea to protect and restore the San Juan Islands and the Salish Sea for people and nature—since 1979.

The intent of the legislature's direction for Washington State agencies to consult with independent scientists, universities, Tribal Nations, and local governments was to complete the guidance plan and ensure that management eliminated both escapement and negative impacts. We are disappointed in this Draft guidance document because, as written, it serves to justify the expansion of commercial net pen operations and fails to address the clear objective of integrating science for the purpose of improved protection of the public interest.

Friends believes that the Draft guidance document is fundamentally flawed and strongly recommends that no expansion of commercial net pen aquaculture be allowed until a comprehensive environmental impact statement using standard technical review and public engagement methodology has been completed; also, a rigorous examination and updating of the regulatory framework to ensure adequate monitoring and enforcement must be in place.

In its current form the Draft guidance document fails to include best available science, especially the most relevant recent research from our region; is inconsistent with federal findings of likely adverse impacts to ESA-listed salmon as well as other fish species; does not meet its intended purpose of eliminating escapement and negative impacts to water quality, fish, shellfish and wildlife; fails to promote a transition to land based aquaculture; places undue burden on local jurisdictions by failing to provide technically credible or sufficiently protective management guidance; is focused on facilitating new commercial net pens as opposed to improving management of existing, problematic operations; is inconsistent with efforts to recover endangered species essential to our economy, culture and ecology including chinook salmon and the southern resident killer whales; fails to address climate change; continues to postpone critical evaluation of regulatory systems; and fails to protect either the public interest or Tribal Treaty Rights. Instead, the document provides a pathway for the expansion of commercial net pen aquaculture in Washington State, a position that is not supported by the science or public opinion.

Across Washington State, the health of our economy and human communities are linked to the health of the environment. This is especially true in San Juan County, where intact marine food webs and natural shorelines are essential to our well-being and way of life. We urge you to reject this Draft guidance and its management recommendations that continue to delay meaningful technical and regulatory review and provide unnecessary support for an industry that, in its current form, is wholly inconsistent with the protection of our natural and human communities.

Two decades of efforts to recover Chinook salmon have taught us the importance of protection. We must not continue to perpetuate the flawed assumption that existing regulatory systems are achieving no net loss. Significant public and private resources have been spent by our organization, our community, and across the region to recover threatened Puget Sound chinook salmon; ongoing and expanded open water net pens jeopardize these efforts and pose real and unacceptable risks to this iconic species and marine food webs. Oversight of existing net pen operations must be improved. Expansion of commercial net pen aquaculture in our state must be prohibited until adequate technical review, public process, and improved regulatory mechanisms are instituted.

Thank you for your consideration.

Sincerely,

Tina Whitman