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After review of the Marine Finfish Net Pen Guidance Oceans Blue Corp and the citizens it works for have concern that a primary environmental risk posed by aquaculture activity is not properly addressed, infact downplayed within the document. This concern centers around marine debris. Primarily we are concerned with the lack of monitoring proposed for aquaculture operations that could cause large amounts of marine debris to be released in the natural environment, the lack of guidance on safe and environmentally friendly materials to be used for operations, the lack of general accountability for lost debris caused by daily activity, and the general neglect by the state to properly establish regulation to meet standards SEPA require regarding marine debris in aquaculture operations.

We believe more guidance should be given to ensure finfish net pens and Washington State aquaculture prevent the introduction of marine debris from operations. This includes minimum monitoring activity from a third party, a list of acceptable materials to be used when creating the aquaculture farms, and increased accountability for marine debris that is lost but not recovered by the organization responsible for the debris.

The guidance provided in this document is similar to the language of other aquaculture guidelines provided by the state which has failed miserably at preventing large amounts of extremely harmful marine debris to be released into the environment. Oceans Blue Corp and its volunteers have removed hundreds of pounds of marine debris cause by a degrading aquaculture farm near Shine Tideland. Oceans Blue Corp has brought the attention of this problem to multiple state agencies yet the farm continues to breakdown and marine debris washes ashore daily with dead sea life or tears through an adjacent eelgrass bed. We do not need more operations like this! We do understand the need for aquaculture and support its growth when properly monitored. The most appropriate way for this to be done is to have a third party auditing system where permitted facilities are inspected inperson quarterly. Of course this creates the problem of who pays for the monitoring? For that we suggest increased permit fees or a

Additionally, as mentioned previously, the language used to address marine debris within the plan immediately underplays the danger marine debris from aquaculture causes. Starting off with saying aquaculture doesn't cause much marine debris is outright misleading, wrong, and borderline illegal. Review of data infact proves the opposite and much more thought should be given to the marine debris section. Furthermore, debris from aquaculture active can be much more devastating to the environment and all that depend on it as often times these items host more pollutants and are designed to catch and hold life. Once lost in the environment, it continues to do this with wild life. Thank you for taking the time to review these concerns and suggestions. Oceans Blue Corp would be happy to provide further feedback and assistance in the future to aid in protecting this unquie environment.