

Rick Safford- Public Comments to DNR regarding SEPA File No. 24-101601

Dated: November 5, 2024

Cc: Washington Board of Natural Resources

Dear Members of the Washington Board of Natural Resources,

The ban on net-pen aquaculture should not be allowed to go through as it is another display of how Hilary Franz has and continues to use and step outside her authority to make decisions for personal interests and should be unbiased. The DNR manages state owned lands for public use to encourage and foster the use of these lands for the production of food, fiber, income and recreation and work in the interest for all the citizens of Washington state. A blanket prohibition on a preferred water dependent use is not in the publics best interests.

State law sets guidelines for DNR to use for evaluation and decision making on whether the use of publics lands makes sense for the application and in the best interest of the public. In these guidelines DNR is supposed to use the community, local, state, and federal government agencies to base their decisions. Hilary Franz has failed to work with any of these agencies and she has made unilateral decisions out of her political and personal interests, which conflict with state and federal rules and policies.

The net-pen aquaculture industry has always worked with the community and government agencies to produce high quality affordable seafoods for human consumption. This is in the best interest of the public. The industry has used third party certifications and inspections and will continue to carry out the necessary monitoring, practices and reporting to ensure environmental compliance and fish health safety. These reports are well documented and presented to the appropriate agencies on a routine basis.

Hilary has failed to utilize the agencies and the available information as a resource on which to base her decisions. She has and continues to make false accusations without providing any scientific bases for these assumptions. She proclaims that the escapement of 250,000 fish was a tragic devastation to the environment and that net-pen aquaculture has a negative impact on wild fish. If this is true, the science should be presented and the effects of the escapement in 2017 quite apparent without a doubt. There are no reports or observations of any Atlantic salmon feral populations occurring in Washington state since this accident. The fish do not survive in the wild and there are countless scientific studies and historical evidence that escaped and purposely planted Atlantic salmon are not successful colonizers in the NW. This issue is also moot anyway, as Washington state law said that only native fish species can be raised in marine net pens now. The company I worked for moved to raising native all-female triploid steelhead. Those fish did well in the net pens, were a quality food product and can be the future for increasing local seafood, creating jobs and allowing future technological innovations to occur in Washington. A managed solution is needed for the future of the people in Washington state. A prohibition is not a managed solution, it is a one side all or nothing decision that will have unintended negative consequences for our communities, small business and the environment down the road.

Around the 1980's, there was bill presented for the net-pen industry to be self-regulated to save government time and money. The industry fought this bill because it was not in the best interest of the industry being on public lands and industry wanted the government to be involved to guide the monitoring process and develop proper regulations for the health of the environment and guidance for the industry for years to come. It was to help work through or avoid times like this.

Due to the failure to renew the leases at existing marine net pens sites there was an immediate loss of income for the federal, state, local governments and the numerous small businesses my company worked with throughout the area. Also, it directly caused the direct loss of 60 to 80 jobs, loss of income for surrounding businesses, and even caused other supporting companies to close or downsize because due to this wrong decision by the Commissioner. But even more so, the greater loss is the production of locally produced, quality and affordable seafood for people in Washington. The impact of the lack of locally grown seafood on the coast requires Washington to import seafood and will continue to increase commercial fishing pressures on the wild stocks in Washington and around the world. There have been "millions" of servings of locally grown seafood that have not hit the dinner table since the lease renewal decline. The ban by DNR will only exacerbate this problem. Marine fish and shellfish aquaculture provides a future ability to grow our seafood sources for years to come.

This is not just about one company, it's about the growing demand that another 2 billion people on this planet by 2050 that will be putting immense additional pressure on the ocean capture fisheries in order to produce a vital protein source. Capture fisheries cannot sustain that pressure, and aquaculture innovation is necessary to meet this and other future challenges. That is why I strongly oppose DNR's proposed ban on commercial net-pen aquaculture. DNR has the ability to use lease conditions and other management tools to mitigate and monitor commercial fish aquaculture leaseholders and DNR needs to explain why they have not given any alternatives rather than a blanket ban on commercial net pens. It also not justifiable to allow delayed release net pens and ban commercial net pens, when they are essentially the same thing. Both are floating fish pens that feed the fish a formulated fish feed until they reach a certain size.

DNR needs to review all the information available to them and look at the big picture which will require them to consult with the other state and especially the federal fisheries agencies that expertise in these future trends in order to properly design management policies that will carefully manage our public natural resources for future generations. DNR's proposed rule language is not a solution and I strongly oppose it.

Thank You

Rick Safford

Pier Manager/Assistant Operations Mgr

Cooke Aquaculture Pacific

rick.safford@cookeaqua.com

206-452-8936