

From: [Sue Corbett](#)
To: [Sanguinetti, Pamela A CIV USARMY CENWS \(US\)](#)
Subject: [EXTERNAL] Comments on 2017 Nationwide Permit (NWP) 48 Commercial Shellfish Aquaculture Activities
Date: Wednesday, December 21, 2016 4:22:17 PM

Ms Sanguinetti,

I wish to comment about the proposed 2017 NWP 48 Commercial Shellfish Aquaculture Activities regional specific and general conditions. I understand the motivation to streamline authorization of shellfish operations but my experience has led me to believe that our unique marine environment will not have adequate protections in place.

I own tidelands on Hood Canal's Squamish Harbor in Jefferson County. Squamish Harbor is a documented herring nursery. We have an abundance of native eelgrass here in the harbor. Since 2013 I have observed geoduck farmers raking and hauling away tideland vegetation and planting PVC tubes in native eelgrass. An area of the beach near a year round stream was bulldozed to provide parking for the farmer. After sending photos to the US Army Corps documenting these events, the corps discovered that the farmer did not correctly identify native eelgrass and was in violation of the rules. It appears to be very difficult to enforce the rules that have been set in place to protect the environment.

Evidence is mounting that the methods used to grow and harvest geoducks is causing more than minimal adverse environmental effects. Watching the farmers tug and pull on the nets they use leaves no chance for vegetation or creatures to survive. The harm is cumulative when the whole process is repeated every 5 years.

The native eelgrass in this harbor provides the unique environment needed for forage fish such as herring and sand lance to survive. The harbor is also documented as having marbled murrelets whose status has just been listed as endangered. Marbled Murrelets bring forage fish back to their nest to feed their chicks but the chicks are dying from starvation. Summer Run Chum come into into our harbor and also depend on the forage fish to survive.

Geoduck farming should not be allowed in regions like Squamish Harbor. Squamish Harbor's environment needs to be protected from geoduck farming practices.

Sue Corbett
Squamish Harbor resident
31 Churchill Lane, Port Ludlow 98365

From: [Sue Corbett](#)
To: [Sanguinetti, Pamela A CIV USARMY CENWS \(US\)](#)
Subject: [EXTERNAL] Comments on Nationwide 48 and Regional Conditions
Date: Friday, January 06, 2017 7:37:51 PM

Pam,

Attached are a few photos to go along with the comments I sent in previously. The photos were all take in Squamish Harbor.

Sue Corbett



IMG 1337

May 19, 2015

Parcel 821334073

PCV tubes planted 2014

Workers taking nets off tubes

Eelgrass removed from area where they are working



IMG 1158

May 17, 2015

Parcel 821334011

Vegetation being raked on parcel without tubes



IMG 0928

April 19, 2015 at 11 AM

Parcel 821334073

Dislodged tubes planted in 2013



IMG 0953

April 27, 2015

Parcel 821334011

Clearing shoreline bank of vegetation for parking.