

From: [Erin Ewald](#)
To: hanna.miller@noaa.gov; [Lee, Rory W CIV USARMY CENWS \(USA\)](#)
Cc: Dyanna.Lambourn@dfw.wa.gov; [Jessie Huggins](#)
Subject: [Non-DoD Source] Harbor Seal at FLUPSY
Date: Monday, August 21, 2023 11:45:10 AM
Attachments: [image001.png](#)
[FLUPSY HarborSeal_08_2023.pdf](#)

Hello Rory and Hanna,

Please find attached Taylor's report regarding a recent interaction with a harbor seal pup at the Shelton FLUPSY.

We have inspected the operation and notified Taylor Executives of the concern.

The paddlewheels on the FLUPSY were installed with protective grates for the purpose of excluding seals. Speaking to the previous FLUPSY manager, who worked on site for over 10 years, he only had 2 deceased seals; 1 died from orca or boat motor, and another was found stillborn on the FLUPSY platform. As the paddlewheel is the only moving part, and the animal was discovered outside of the wheel housing, it seems very unlikely that its injuries were a result of the assembly.

That said, we do recognize that more seals have been coming into the area, and there are therefore additional possibilities for interaction. We have already taken steps to improve training for the crews on site, and will work to proactively provide this training again, as well as walk the site and ensure appropriate BMPs are in place next spring prior to pupping season.

I have cc'd Cascadia and WDFW on this email. Should anyone from your organizations like to visit the operation and observe, we would welcome any other suggestions or thoughts on how to reduce risks to wildlife.

Respectfully,
Erin

Erin Ewald
Director of Regulatory Affairs



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August 21, 2022

Via Email: Rory.W.Lee@usace.army.mil

Mr. Rory Lee
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Seattle District
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Via Email: Hanna.Miller@noaa.gov

Ms. Hanna Miller
NOAA
Natural Resource Management
Seattle, WA 98124

RE: Harbor Seal at Taylor Shellfish Farms Oakland Bay FLUPSY 8/14/2023.

Dear Mr. Lee and Ms. Miller,

This memo is to follow up with you regarding an incident first reported on 8/14/2023 involving a harbor seal at the Taylor Shellfish Oakland FLUPSY. While all of the information is not yet available, I believe we have sufficient information to determine what happened and possible actions Taylor Shellfish can take to try and prevent future similar negative interactions.

On the morning of **8/14/2023**, FLUPSY crews arrived at the facility. Once there, they noted a small seal stuck against a water gate near the FLUPSY paddlewheel. The crew immediately turned power off to the system and used a flat sided tool to gently navigate the seal into an empty bin. The area had no bottom so that the seal could swim away. However, after observing the animal, the crew believed it to be injured. The crew then contacted Cascadia Research and notified me of the incident. I contacted Taylor's Environmental Program Manager to follow up with the crew and offer assistance to Cascadia.

On site, Cascadia collected the animal and toured the facility, observing the slow movement of the paddlewheel and low flow of the water through the shellfish seed nursery. Crews have noted significantly more young seals swimming around the farm in recent weeks. The same morning, a second seal was reported to Cascadia, deceased and floating outside the farm. No obvious trauma or sign to indicate how the seal died were readily apparent. This seal appeared to have been marked with paint and its condition indicated it had been dead more than 24 hours. A third seal, reported July 24th, was found to be continually hauling out onto the FLUPSY. It appeared very young and emaciated. This seal was also collected by Cascadia and sent for rehabilitation and reported to be doing well.



On **8/15/2023**, Cascadia reported to Taylor that the seal collected from the FLUPSY bin had to be euthanized. They found trauma on its head and thoracic areas and believe it may have been crushed by the paddlewheel.

During a review of the system to determine if and how this may have occurred, the Fabrication Director noted that the FLUPSY has been equipped with grating and gates to specifically prevent seal access into the paddlewheel area. *As the paddlewheel is the only moving part on the system, if the seal had a traumatic injury, it is more likely that it happened outside the FLUPSY and the animal then hauled out to try and find safety and rest.* When the animal then jumped into the “river” of water created by the paddlewheel, with its injury it could not get out and was then pinned outside the paddlewheel, but against the grate. The only way to completely prevent seals from accessing the FLUPSY would be to fully fence the perimeter of the platform with plastic netting and fully cover empty water spaces when bins are removed for cleaning, repair or seed harvest. However, the fence would need to be taken down each day for operations and the system is not set up currently to safely secure covers of the platform. Plastic netting is also a hazard to wildlife and its risk must be considered.

Taylor Compliance Manager will meet with the FLUPSY crew to review the marine mammal training module and ensure the actions comply with the marine mammal protection act and Taylor’s farm BMPs. In addition, the Compliance Manager will work with the FLUPSY manager to anticipate strategies for next year’s pupping season and work together to identify any additional strategies that restrict access to the FLUPSY platform.

Taylor Shellfish and its FLUPSY crew appreciate the natural and biodiverse environment they work in and were saddened by this incident. We will continue to solicit and integrate recommendations from Cascadia Research, WDFW and NOAA to reduce risk and avoid these interactions, whenever possible in the future. Please contact me with any comments or questions at erine@taylorshellfish.com, or (360) 432-3348.

Sincerely,

Erin Ewald
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Shelton, WA 98584