

**From:** [Steve Dittmar](#)  
**To:** [Sanguinetti, Pamela A CIV USARMY CENWS \(US\)](#)  
**Subject:** [EXTERNAL] Comments on 2017 Nationwide Permit (NWP) 48 Commercial Shellfish Aquaculture Activities (email 1 of 2)  
**Date:** Thursday, January 05, 2017 6:47:11 PM

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Dear Pam,

I would like to submit my comments to you on the proposed 2017 NWP 48 Commercial Shellfish Aquaculture Activities.

This is email 1 of 2. The second email will contain pictures which may have made this email too large to be delivered through your email system.

I own tidelands and adjoining upland property here on the Squamish Harbor. My tidelands are actually adjacent to the existing Brad Nelson geoduck farm and I have had the opportunity to see firsthand most of the stages of the tideland geoduck farming process over the last 3 or 4 years. The only step I have not personally observed is the actual hydraulic extraction process. I have observed what remains of the beach after the small harvest that occurred down the beach a few years ago and it was devastating. With geoducks planted every foot or so apart the hydraulic extraction leaves the area completely churned up, native species and native habitat gone, toast!

Our Squamish Harbor was once a very prolific breeding ground for forage fish and we would only hope that our governmental leaders and the processes and policies they put in place would be leading us back to the rich habitat that was once here. Forage fish are very much at the root of the food chain for most all life around the salt water. Critical habitat for the forage fish is the eelgrass.

I understand that the requirement for preserving eelgrass has been removed from the requirements for shellfish farmers. I understand the right for special interest groups to lobby for their own causes (protecting their profits) but I don't understand how those in our government's leadership positions would allow themselves to be persuaded to a practice that is so clearly not in the best interest of our fragile environment. Protecting the eelgrass is critical for the forage fish and the entire aquatic based food chain.

Please make sure that the requirement for preserving eelgrass and the native environment is kept in the requirements for geoduck farmers.

Further, I would like to comment on the completely destructive practices that I have personally observed with the geoduck farm that is adjacent to my tidelands.

- 1) First, the tidelands are cleared of native vegetation

2) 10" long 4" diameter PVC tubes are stomped into the sand at about 12" spacing. Doing the math, that is about 5 to 6 miles of PVC tubing per acre injected into this fragile environment.

Many of these tubes get dislodged in our storms and the loose tubes get drawn out into our bay. I have personally snorkeled out in the bay beyond my neighbor's geoduck farm and observed 100's of loose tubes out in deeper water. Left to pollute as long as the PVC lasts.

I am quite certain that if I were to dump 6 miles worth of PVC tubing onto my tidelands in 10" pieces and left many to get sucked out into the bay that I would be arrested, fined and possibly see some prison time. Why then, is it somehow ok for a "farmer" to do the same thing for his own profit??

3) After 1.5 to 2 years the tubes are removed and many of the areas are covered with nylon type nets. I have personally observed these nets trapping and killing the native wildlife and making it very difficult for birds and larger fish to feed. Please see my sampling of pictures below of crabs caught and killed in my neighbors geoduck protection nets.

4) About year 4 or 5 the 1.5 lb geoducks are harvested with 3 foot hydraulic rods that are jammed into the sand to liquefy the sand so the geoduck can be extracted. Imagine the destruction to all the life in the sand column and surrounding vegetation, it is all uprooted into the water column, destruction in exchange for personal profit of the "farmer".

5) After the harvest the area is once again "planted" with many 1000's of PVC tubes and the cycle of pollution and destruction continues

Some would promote this geoduck farming process as "job creating". Lets be clear. It is ONE farmer receiving enormous profits with 99% of the harvest shipped overseas. From private tidelands almost zero taxes are generated and for "job creation" it is about 10 teenagers employed for a few low tide hours a day for the week of low tides ONCE every 5 years. Then there is the ONE caretaker that comes for a few hours on low a few of the tide days throughout the 5 year growth period. This is simply not significant "job creation" nor is it significant as a tax base. From my perspective, this is simply a "raping" of our fragile local environment for the enormous profits of the farmer and essentially none of the "produce" going back into our local people, it gets shipped out ½ way around the world. I am not against a farmer making a profit but I am against farming activities at the expense of our fragile environment.

Please help us save this fragile environment here in Squamish Harbor by stopping the destructive practices of geoduck (and any other) farming and helping restore the original marine habitat so we can return to having a healthy aquatic food chain.

Pictures referenced above will be sent in a second email (to keep the size of this email smaller)

Steve Dittmar

Northwest Technology Resources, Inc.

206-619-6822

## Steve Dittmar

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**From:** Steve Dittmar <steved@nwtri.com>  
**Sent:** Thursday, January 05, 2017 6:46 PM  
**To:** 'pamela.sanguinetti@usace.army.mil'  
**Subject:** Comments on 2017 Nationwide Permit (NWP) 48 Commercial Shellfish Aquaculture Activities (email 2 of 2)

Dear Pam,

This is the second of my 2 emails to you on this subject. This email just contains the pictures referenced in the first email. I split these emails up to make sure the text of the first email go to you without being rejected for the email being too large with pictures.

Pictures I took in fall of 2016 of netting over the adjacent geoduck farm trapping and killing wildlife:









I took the following pictures snorkeling out in the deeper water out beyond the Brad Nelson geoduck farm. Please note these tubes have Brad Nelson's company information on the tubes.





***Steve Dittmar***

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