

HOOD CANAL ENVIRONMENTAL COUNCIL

America's Unique Heritage

P. O. BOX 87 / SEABECK, WASHINGTON 98380

January 3, 2017

Ms. Pam Sanguinetti
Regulatory Branch
Post Office Box 3755
Seattle, Washington 98124-3755
pamela.sanguinetti@usace.army.mil

Re: Clarification Notice: Nationwide Permit 48 - Commercial Shellfish Aquaculture

Dear Ms. Sanguinetti:

The Hood Canal Environmental Council (HCEC) requests that the following comments be entered into the public record regarding the above referenced US Army Corps of Engineers (Corps) Special Public Notice dated November 30, 2016. Considering the extensive existing industrial shellfish farming in the Hood Canal watershed, the HCEC believes that the regional conditions for the Nation Wide Permit (NWP) 48 are especially important.


Since 1969, the HCEC has served as an environmental watchdog organization dedicated to protecting the environmental health of the Hood Canal watershed. It is also a member organization of the West Sound Conservation Council (WSCC).

In its December 30, 2016 letter regarding the Corps' proposed regional conditions, the WSCC recommended the application of the Regional Conditions 10 and 14 to the 2017 NWP for the purpose of protecting eelgrass and forage fish, which are vital to the continued existence of the Salish Sea ecosystem, including Hood Canal. The purpose of this letter is to express the HCEC's strong support for WSCC's recommendations as outlined in its letter to the Corps.

To state that regional conditions 10 and 14 will not be applicable to the NWP 48 ignores numerous studies, including the SeaGrant Ferriss study and the Corps own new Biological Assessment report, which recognizes the potential adverse effects to fish and eelgrass. In the Hood Canal area, resource managers are particularly concerned about any risks to eelgrass, forage fish, salmon and bull trout, and seabirds, including the Marbled Murrelet. Millions of dollars have already been spent in an effort to propagate eelgrass and prevent further losses in fish and wildlife populations in Hood Canal. It is imperative that we protect critically important marine habitat from industrial shellfish farming, especially from geoduck farming.

The HCEC appreciates the opportunity to comment on this matter and looks forward to the Corps' decision regarding the proposed regional conditions.

Sincerely,



Donna M. Simmons, President,
Hood Canal Environmental Council