

May 14, 2004

The Honorable Gary Locke
Governor of Washington
State Capitol Building
Olympia, Washington 98504



Partners with Mother Nature.

I am writing this letter in regards to the recently released Preliminary Report and draft of recommendations from the U.S. Commission on Ocean Policy, which your office has received. As you know, the Commission has asked our nation's governors for comments on their recommendations before they publish the final report.

Many of the recommendations in the U.S. Commission report bear directly on the shellfish aquaculture industry. The Pacific Coast Shellfish Growers Association, which represents the interests of shellfish farmers on the U.S. West Coast, has prepared comments on these recommendations. We respectfully request that you give our comments due consideration and incorporate them into your response to the Commission.

The shellfish aquaculture industry in Washington is significant. We are the largest producer of farmed molluscan shellfish in the U.S. with an annual farm-gate value of \$76 million and growing. Our industry provides family-wage jobs in rural communities while also bringing critical "new" dollars into these areas. At the same time, our farmers work diligently to protect the health and well being of the sensitive marine areas in which they work. Given their dependence on the health of the marine ecosystem to produce their crops, they have a significant vested interest in maintaining and protecting these areas.

The shellfish aquaculture industry is unique, in that our economic health is directly tied to environmental health. Water quality degradation poses the greatest threat to the shellfish industry on the West Coast, but we are also facing serious challenges from an inadequate infrastructure at the federal and state levels that creates an uneven playing field in today's international marketplace. There is currently a \$7 billion federal seafood trade deficit. This deficit is second only to oil! Were appropriate support systems in place, the U.S. West Coast, and Washington in particular, is in a unique position to help offset this deficit.

The comments provided below are a synthesis of the various categories of issues found throughout the Commission recommendations.

Aquaculture in the Exclusive Economic Zone

Chapter 22 suggests that future marine aquaculture development be limited to the Exclusive Economic Zone where user conflicts and impacts can be minimized. Many of the states have vibrant, sustainable and environmentally responsible aquaculture industries currently located in nearshore waters. These industries are invaluable to rural coastal economies harmed by the declines

Pacific Coast Shellfish Growers Association

120 State Avenue NE PMB #142 ♦ Olympia, Washington 98501 ♦ (360) 754-2744 ♦ Fax 754-2743 ♦ E-mail: pcsga@pcsga.org

in wild fishery resources. With appropriate research and development support and facilitation for comprehensive aquaculture planning under the CZMA these industries can continue to thrive and expand. They are far better positioned to contribute to the immediate expansion of aquaculture production in the U.S. than offshore where the technology and permitting by in large have yet to be developed. Key to the survival of this nearshore aquaculture, particularly the shellfish industry, is implementing all of the recommendations contained in Chapter 14 regarding protecting and improving water quality.

Nonpoint source pollution:

Nonpoint pollution is insidious and one of the greatest threats facing the shellfish industry. The problems occurring right now in Hood Canal stand as a prime example of the effect of failing to control nonpoint pollution. Among the recommendations found in the Report is strengthening the ability of local watershed groups to address problems by providing them with adequate technical and financial support. On-the-ground local efforts, supported at every level, will be key to protecting and restoring this critical habitat. There is merit in the concept of combining the efforts of the U.S. Environmental Protection Agency and the National Oceanic and Atmospheric Administration in their respective jurisdictions over the Clean Water Act and the Coastal Zone Management Act to form a more cohesive, comprehensive approach to the nonpoint pollution problem. We also agree with the imposition of financial disincentives to motivate meaningful progress toward meeting existing water quality standards. (*Recommendations 14-9, 14-10, 14-8, 14-13*)

Upland wastewater:

Local communities need increased technical and financial assistance to improve septic, stormwater and treatment systems; and building codes, zoning ordinances and enforcement for stormwater and septic systems must be strengthened. (*Recommendations 14-1, 14-2, 14-3, 14-4, 14-6, 14-11, 14-12*)

Marine vessel wastewater discharges:

Uniform discharge standards and waste management procedures, combined with incentives for industry investment in treatment technologies and support for building more pump-out facilities are tangible ways to deal with these sources of pollution. Consolidating the Clean Vessel Act grant program to the EPA should be considered if it will result in administrative cost savings and a more comprehensive and effective program. (*Recommendations 16-5, 16-7, 16-8*)

Oil spill prevention:

Shellfish growing areas should be included in any risk-based analysis for oil spill prevention. (*Recommendations 16-12*)

Aquatic Nuisance Species:

Several recommendations on ballast water and Aquatic Nuisance Species management are found in the report. The existing Aquatic Nuisance Species Task Force should be reauthorized, with inclusion of both NOAA and the USDA. Efforts should be coordinated with the new Ocean Council, but redundant and duplicative efforts should be avoided. (*Recommendations 17-2, 17-3, 17-5*)

Ecosystem-based/Coordinated Management:

Several recommendations throughout the Report have to do with more coordination among and oversight of the various agencies that currently have jurisdiction over marine resources, including the establishment of a new National Ocean Policy and Presidential Council of Advisors, and a reorganization of the federal government to develop a more unified, ecosystem based management approach. In theory, this is a sound concept. Functions should be collapsed where possible and coordinated more efficiently, but caution should be exercised in establishing even more layers of bureaucracy.

(Recommendations 7-5, 4-3, 4-10, 9-3)

Coordinated Support for the Aquaculture Industry/Research and Development:

Several recommendations in the Commission report are related to implementing a national policy for expanding “environmentally and economically sustainable marine aquaculture.” The PCSGA fully concurs. The U.S. Department of Commerce goal to expand aquaculture five-fold by 2025 will never be realized without a coordinated policy, including a reasonable, logical permitting and regulatory environment. This goal will not be met without an in tandem infusion of financial support into research and development. Funding and expanding regionally-based cooperative research programs in NOAA and collaborative projects among scientists and the seafood industry is absolutely critical.

(Recommendations 19-12, 22-1, 22-3, 23-4, 24-1, 25-1, 22-2)

Industry Representation on Advisory Bodies:

Too often, decisions that directly affect the shellfish industry are being made in a vacuum with no input from growers. The report recommends that at least two representatives from the commercial fishing industry be included on the Regional Fishery Management Council. PCSGA recommends one of these seats be filled by a representative from the (shellfish) aquaculture industry.

(Recommendation 19-12, 4-10)

On behalf of Washington’s shellfish industry, thank you for your consideration of these important issues. If we can provide you with any additional information, please contact Robin Downey, PCSGA Executive Director, at 360-754-2744.

Sincerely,



Mark Schaffel
President, PCSGA