

Brian Shea

From: Brady Engvall [brady@bradysoysters.com]
Sent: Sunday, June 29, 2008 4:48 PM
To: Brian Shea
Subject: Fw: Critical Areas Document comment.

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Mr. Brian Shea
Planning and Building Division
Dept. of Public Services
GH County
100 West Broadway Ave, Suite 31
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Re: Draft 1 Critical Protection Areas Code Date: 06-29-08

Dear Mr. Shea,

Thank you for the opportunity to comment on this very important matter. Please incorporate by reference comment letters submitted by Friends of Grays Harbor (FOGH), Grays Harbor Audubon and Futurewise.

General discussion. As a retired shellfish farmer I appreciate the counties work to update their Critical Areas Ordinance (CAO). It is also important to note that the shellfish industry in Washington state has experienced a rapid decline in growing areas due to water quality problems associated with upland development and the lack of protection of critical areas. It is with hope that this update will help address the water quality concerns of the industry and our citizens alike. It has been demonstrated that just tinkering around the edges of critical areas will not produce measurable improvements and that only strict adherence to best management practices, best available science and implementing Growth Management Act principles will bring much needed results. It is not only shellfish but many other facets of our local economy underpin their vitality with water quality certainty. To name a few- clams, commercial and recreational fishing, general tourism, Olympic Park gateway, boating and quality of life issues. In essence- when is the last time you heard a county advertise poor water quality for a reason to come visit?

The draft is presented in two parts the Policy Discussion and GH county Code 18.06. The first section is a dated discussion of the past and should be updated to reflect current thinking on critical areas and their impact on the general welfare of GH county. As an example- the price paid to commercial fishers this spring for king salmon is from \$5.00 to \$9.00 a pound and the discussion talks about .40 cents a pound for kings in 1967. The data is not relevant. As far as sport fishing the fleet is now about 40 boats at Westport and back then it was over 200 fishing units for sports. Things have changed dramatically and with the changes come updated thinking which should be reflected in any discussion of today's CAO update.

The second part is the draft Grays Harbor Code 18.06 and deals with proposed changes to the code. One of the important issues confronting a code change is buffers for critical areas. As a shellfish grower I'm concerned about adequate buffers be required to protect valuable functions of wetlands. Under the new proposal these protections are not strong enough and I would support current science based proposals to be:

25 to 75 feet for wetlands with minimal habitat functions and low intensity uses adjacent to the wetland.

75 to 150 feet with wetlands with moderate or high-intensity land uses adjacent to the wetland.

150 to 300 feet for wetlands with high habitat functions regardless of the intensity of the land uses adjacent to the wetland.

Also looking at 18.06.140 Critical Protection Area Development for Fish and Wildlife Habitat I don't find a discussion about resource lands such as shellfish growing areas in Grays Harbor and ocean beaches. Sealife (clams, oysters, aquatic vegetation and all forms of fish) provides important benefits to the county. Ninety square miles (richer than any terrestrial farm land) of resource lands should be one of the most important components of this document. The harbor is home to mature and well as juvenile forms of sealife, all important to citizens. The creatures need protection for sustainability. Shorelines and their uses impact harbor water quality and protections need to be included in this document.

Thank you for the opportunity and if any questions arise please contact me at 268 5518

Regards,

Brady Engvall