

Brady Engvall  
3714 Oyster Pl. E  
Aberdeen, WA.  
98520

Mr. Brian Shea  
Planning Building Division  
Dept. Public Services  
GH County  
100 West Broadway  
Montesano, WA.  
98520

Re: Draft 2 Critical Protection Areas Code

Dear Mr. Shea,

Thank you for the opportunity to comment on this very important matter. Please incorporate by reference comments submitted by Friends of Grays Harbor 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 shellfish industry and our citizens alike. It has been demonstrated that just adjusting around the edges of critical areas will not produce measurable improvements or conservation 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 that underpin their vitality with water quality. To mention a few: Fishing- both commercial and sport, tourism, clam digging and bird watching. Also the quality of life for our citizens depends on water quality

I believe that draft two is a much better document but still leaves me with concerns about the future of the shellfish industry. It is refreshing that aquaculture is mentioned with agriculture but it is revealing that no mention of resource lands, as it pertains to shellfish culture, is discussed. Shellfish Habitat Conservation Areas are all public and private tidelands that have been identified by the Washington Dept. of Health as being suitable for commercial growing areas as well as any recreational harvest areas identified by the Washington State Department of Ecology. Any area that has been designated as a Shellfish Protection District is also a Shellfish Habitat Conservation Area. Grays Harbor county is also required to include resource lands in their Comprehensive Plan.

Because of the sensitivity of aquaculture resource lands I support larger buffers than the current draft presents. Examination of Critical Area Ordinances in counties ringing Puget Sound reveals buffers of 150 feet for resource lands. Puget Sound counties have determined this buffer to be adequate and it must be remembered that aquatic resources reach to the margins of the shoreline not just out in the middle of the estuary.

Starting on page 63 of Draft 2, Item C, Quinault Lake and its environs is treated differently in Draft 2 than the rest of the county. The goal of the CAO update is to be consistent for all classes of property within the county. The Lake Quinault Fish and Wildlife Habitat Conservation Area does not meet that standard but establishes a higher standard. For Grays Harbor's aquatic

resource lands it would be appropriate to require the Quinault standard be applied thus protecting the Harbor's water related industries and quality of life.

In conclusion I believe that Draft 2 does not meet the standard that insures Grays Harbor's Resource Lands are protected into the future. I 'm confident the following renditions of the draft code will take into consideration citizen comments.

Sincerely,  
Brady Engvall Dated: 11-06-08