

**From:** [BrownScott, Jennifer](#)  
**To:** [Stenvall, Charlie](#)  
**Subject:** JST Aquaculture - Shoreline Permit Hearing  
**Date:** Monday, November 25, 2019 10:24:25 AM

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Clallam County public hearing for JST Aquaculture Operation in DNWR was held Thursday, November 21, 2019. A decision is scheduled to be made on December 23, 2019. The record for this case is now closed.

The Hearings Examiner has received over 180 exhibits related to this case. There were approximately 34 members of the public in attendance. 10 members of the public (did not count current/previous JST staff) provided testimony. 8 members of the public/NGOs were against the project, Audubon wanted further definition of the monitoring parameters, and Sierra Club was the only positive testimony - they believe it is a Treaty Right.

During the course of the hearing, several inaccurate and/or misleading statements were made. These statements included:

- The Hearings Examiner and Clallam County DCD expressed confusion over FWS withdrawal of specific comments for general comments. JST's asserted the FWS letters were withdrawn in response to JST submission of a "substantial scientific rebuttal".
- Hearings Examiner stated USFWS has general concerns, but no specific information regarding impacts to back them up. JST concurred.
- JST stated DNR has not received any correspondence from FWS stating their is a conflict. While this is true, it is only because DNR told me that they are not working on this lease until all permits are acquired. Our input is not requested until that time.
- There was discussion alluding to the Tribe having a Treaty Right for aquaculture on this site.
- No clarity was provided as to how many people or how long it would take to maintain 80,000 bags. JST staff admitted their estimates are based on their Blyn operation (which does not have 80,000 bags). They did not describe how many bags could be flipped using the estimates provided in the application. A member of the public estimated 2400 bags would need to be flipped each day to maintain 80,000 bags using the staff and time estimates provided in the application.
- No one clarified the current DNR lease (in hold-over status) was provided without County or Corps permitting.
- Folks keep stating FWS has not had issues with past leases - did not mention this is the first time permit process has been completed for this lease.

As always, this is just a summary of the main points. If you would like more detail, I am happy to discuss or provide my notes from the hearing.

If I don't talk to you before Thursday...HAPPY THANKSGIVING!!!

-jennifer

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