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BEFORE THE HEARING EXAMINER
FOR THURSTON COUNTY

In the Matter of the Appeal of:)	Appeal No. 16-106159 VE
)	Case No. 2014108800
)	
Patrick Townsend, Kathryn Townsend, and)	SECOND DECLARATION OF
Anneke Jensen)	ROSALIND A. SCHOOF
)	
of the May 3, 2016 Mitigated Determination of)	
Non-Significance in the request of ChangMook)	
Sohn for Substantial Shoreline Development)	
Permit for an Intertidal Geoduck Aquaculture)	
Operation)	

I, Rosalind A. Schoof, declare as follows:

1. I am over the age of 18 years and make this declaration based upon my personal knowledge.
2. My position, background, education, and experience are stated in paragraphs two through four of the First Declaration of Rosalind A. Schoof.
3. In their Response to Motion for Dismissal and Summary Judgement (“Response”), Appellants cite an article by Boris Worm in support of their contention that plastics have adverse health effects. As was the case for their initial argument, Appellants

1 fail to link this claim to plastic aquaculture gear, let alone the specific type of gear that
2 will be used for the Applicant's proposed geoduck farm. Further, the Worm article
3 Appellants cite does not provide evidence of adverse effects on mammals of estrogenic
4 chemicals released from plastics.

5 4. Worm provides a very broad overview of the global issue of plastic
6 accumulation from multiple sources, and he discusses general concerns about
7 microplastics, but he does not address aquaculture gear generally or geoduck aquaculture
8 gear specifically. In fact, Worm concludes "the first choice for reducing plastic pollution
9 is to minimize its release into the environment through integrated waste management
10 systems." This conclusion supports the position that control of land-based plastic waste is
11 a key step in control of marine plastic debris.

12 5. Appellants state with no support whatsoever that PVC and other plastics
13 used in aquaculture are "all made of plastic with various estrogenic and other effects".
14 This is a speculative statement not supported by any scientific evidence.

15 6. Despite their own speculation, Appellants claim that the statements in my
16 first declaration regarding the presence of estrogenic chemicals in wastewater and
17 stormwater runoff are speculative. However, unlike Appellants assertions, my statements
18 are supported by citing several scientific articles and reports.

19 7. Appellants' Response does not contain any information that alters my prior
20 conclusion that the information provided by Appellants does not demonstrate that plastics
21 as used in geoduck aquaculture leach chemicals that have estrogenic activity, nor does it
22 demonstrate that any chemicals that might leach would have any adverse environmental
23 impacts.

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I certify under penalty of perjury under the laws of the State of Washington that
the foregoing is true and correct.

EXECUTED this 25th day of August, 2016.



Rosalind A. Schoof,
PhD, DABT, Fellow ATS