

From: [Lyndon C Lee](#)
To: [Public Comments](#)
Subject: Shorts Family Farm
Date: Friday, April 19, 2024 12:44:53 PM

I am writing to offer a summary of comments I offered at the Public Meeting on the Short Farm on Wednesday, April 17, 2024.

I spoke to three things -

1. In visioning for the Shorts Farm project, it is important to remember that there are tiered U.S. Federal, Washington State, and Jefferson County jurisdictions over the extensive waters/wetlands that occur on the property. Understanding the effect that these jurisdictions will have on planning is crucial to meeting the stated Project objectives of "coloring within the lines."

2. If part of the goal in management of the Short Farm is to grow crops, then such farming needs to be designed to be compliant with the agricultural, silvicultural, and reaching exemptions articulated in sections 404 (f)(1) and (2) of the Clean Water Act (CWA). This is because Shorts Farm has not been designated as prior converted cropland by NRCS. In fact it is so wet that it would be a large technical and procedural/administrative error to try and do so, especially as such a designation would need to be "after the fact" in the context of NRCS rules and administrative procedures that are part of the Swampbuster provisions of the Farm Bill.

3. The goals for Chimacum Creek as articulated ignore the upside potential of treating the waters/wetlands that occur on the Short's Farm as an integrated and connected ecosystem - its not just a creek. Using this ecosystem approach widens the scope of how people think about the creek and what is possible for the Port/Community to achieve on the property in the context of ecosystem restoration and management of the creek and its associated wetlands.

A couple of other comments come to mind -

1. The fact sheet passed out at the 4/17/24 meeting states that Semiahmoo Mucks are USDA prime-rated soils. This is only true if they are effectively drained, which is not the case on the Shorts Farm nor should it be. In fact, such drainage would have significant irreversible and permanent impacts on the structure and functioning of the Chimacum Creek waters/wetland ecosystem as it occurs on the property and on reaches of the creek and its wetlands upstream and downstream from the property. In addition, such drainage would be out of compliance with conditions offered in the CWA 404 (f) 1 and 2 exemptions for farming, silviculture and ranching. Finally, the Washington State Section 401 and Jeff. Co Critical Areas ordinances come into play on the property and conversion of a Category 1, peat-based fen/stream complex to agriculture is in no way consistent with the goals of the Critical Areas program.

2. Taking an ecosystem approach, why are "Wildlife" issues listed as a separate category in the visioning structure? In fact, faunal species are part of the overall

ecosystem. Thinking about them in this way opens up design, restoration and management opportunities that cut across artificial "boxes" or designations that ignore the connections among physical environments and the organisms that inhabit them.

Thank you for your attention.

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Responses received from Red Dog Farm after a request sent on 05/06/24 for more visioning input from the younger generation

May 10, 2024

Hi Clelie,

We sent to our staff, hope you hear from some of them!

My vision for Short's Farm is multi-faceted- habitat, public access, and agricultural infrastructure.

I'd like to see public access to enjoy the habitat and space- a walking trail, interpretive signs would be cool. Boardwalk over the wetland would be amazing. The hunting access is really important in our community and I would like to see it continue. There are other land projects that manage birders/visitors as well as hunting, such as the Nisqually National Wildlife Refuge. That is an amazing place that I would recommend checking out as a model of farmland to habitat/public access conversion.

For the buildings and area out of the wetland, I would love to see it be used as a resource for the farming community- farmworker housing, cold storage, dry storage, meat processing, seed cleaning are all high needs for our community which are currently lacking.

In my opinion there is very little farmable land on the property. The little that there is only has a very short reliable dry window and especially with tenants (as opposed to land owners) would be very easy to abuse the land by working or running animals on it in too wet conditions. I absolutely think mining the soil should stop. I don't envision farming continuing on the property in any large scale way.

Thanks for asking for our opinions! I'm happy to talk more if it's helpful for you. Best of luck with your project!

Karyn
360-774-6249

May 11, 2024

Hi Clelie,

Thanks for reaching out to us! I was indeed at a few of the events surrounding Short's Farm. It's exciting to see how the property will evolve.

If it's feasible, I'm in favor of using the building envelopes for farmworker housing. I've been the office manager here at Red Dog Farm for the past five years, and part of my job is to help with hiring new crew. The hardest part about recruiting is finding a place for our crew to live affordably. If we want to keep Chimacum's rural, agricultural character, Chimacum needs to have a place for agricultural workers to live. We compete for experienced farmworkers with many other farms, many of which have on-farm crew housing or are located in an area with more available affordable housing options. Our potential new recruits often ask about the housing market in our area, and the ability to find housing is one of the factors that helps them decide whether to come work for us. If farmworker housing was available on the Short's property, our farm (and other farms in Chimacum) would be able to attract more higher-quality job candidates, which would help our farm be more efficient and effective.

Thank you for your help with this exciting opportunity!

Rachel Covault

She/Her

Office Manager

Red Dog Farm

360-732-0223

From: [Wendy Feltham](#)
To: [Public Comments](#)
Subject: Short Farm
Date: Monday, May 13, 2024 8:54:44 PM

Dear Port Commissioners,

Thank you for asking for public comments about Short Farm. I am delighted to share my experiences there, and my suggestions for its future.

As a birder and member of Admiralty Audubon, I visit the stretch of farmland accessible just off Center Rd. many times every winter to observe the swans. This is a remarkable gathering of over 100 swans, and also hundreds of ducks and geese. It's the largest gathering of these waterfowl in Jefferson County, and very exciting to observe and to photograph.

Just this week I visited another section of Short Farm for the first time-- the wetlands beyond the farmhouse. A birder friend and I drove a short distance past the bridge, and walked back with binoculars, camera, and spotting scope. It was thrilling to watch birds I've rarely seen-- Long-billed Dowitchers, Yellow Warblers, a Cinnamon Teal (duck), and a Solitary Sandpiper, among many others.

This farm is truly a treasure for birds. Birds, especially migratory birds, have a tough life with loss of habitat and climate change. I believe we must do everything we can to protect them. I urge you to maintain the habitat created by this farm, and to continue to provide public access.

Sincerely,
Wendy Feltham
Port Townsend