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May 7, 2021

Geoducks Unlimited LLC Attn: Greg & Anne Reub 5039 78th Ave NW Olympia, WA 98502

RE: Coastal Zone Consistency for Corps Reference No. 201500264,

Dibble Property Geoduck Farm, Thurston County, Washington

Dear Greg & Anne Reub:

On March 29, 2021, the Department of Ecology received a Certification of Consistency with the Washington State Coastal Zone Management Program (CZMP) for the above project.

This determination is for the proposed project to cultivate up to 0.49 acres of geoduck in a 0.67-acre project area in Totten Inlet. The proposed area would be located on intertidal tidelands between -4.5 ft and +2.0 ft mean low low water (MLLW). No work or storage of materials would occur between the ordinary high water mark and +2.0ft MLLW and no permanent construction would be implemented. The proposed action contains the following main activities: (1) planting and grow-out, (2) harvesting, and (3) support & maintenance.

Planting will occur over a 1-year period, and the site will be planted with geoduck seed in 4"-wide PVC culture tubes, with predator exclusion netting over each tube and a cover net over all the tubes. Tubes will be pushed into the substrate by hand or foot. The cover net will be installed to allow fishing nets (e.g. seines or drift nets) to go over the tubes without getting caught. This would involve "tucking" the margins into the substrate and securing without obstruction.

Tubes and nets will be removed after 1-2 years, once the young clams can evade predation. Harvest will occur using a hydraulic wand during low tide or at high tide by divers. The pressure at the nozzle is approximately 40 pounds per square inch and the volume is approximately 20 gallons per minute. Harvested clams will be placed in containers and transported by boat to an upland facility. For planting and harvesting activities Geoducks Unlimited would access the site by upland and by boat, and for maintenance activities Geoducks Unlimited would access the site from the upland habitat.

The project site is located on tidelands within Totten Inlet, on parcel number 39000006000, adjacent to 10221 Steamboat Island Road NW, near Olympia, Thurston County, Washington; Section 33, Township 20 North, Range 2 West; WRIA 14, Kennedy / Goldsborough Watershed.

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Pursuant to Section 307(c)(3) of the Coastal Zone Management Act of 1972 as amended, Ecology concurs with Geoducks Unlimited determination that the proposed work is consistent with Washington's CZMP.

If you have any questions regarding Ecology's consistency decision, please contact Teressa Pucylowski at teressa.pucylowski@ecy.wa.gov.

YOUR RIGHT TO APPEAL

You have a right to appeal this decision to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this decision. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do all of the following within 30 days of the date of receipt of this decision:

- File your appeal and a copy of this decision with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this decision on Ecology in paper form by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel RD SW STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

Sincerely,

Brenden McFarland, Section Manager

Environmental Review and Transportation Section Shorelands and Environmental Assistance Program Dibble Property Geoduck Farm Corps No. 201500264, Aquatics No. 138654 May 7, 2021 Page 3 of 3

e-cc: Aquaculture-Reinforcement-Team@usace.army.mil

Benjamin Sherman, Corps of Engineers

Laura Hendricks, Coalition To Protect Puget Sound Habitat

Amy van Saun, Center for Food Safety

Marty Beagle

Teressa Pucylowski, Ecology Loreé Randall, Ecology

ecyrefedpermits@ecy.wa.gov - Aquatics No. 138654