



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

May 11, 2021

Sound Shellfish Company  
Attn: Ian Child  
PO Box 12475  
Olympia, WA 98508

RE: Coastal Zone Consistency for Corps Reference No. **200701367**,  
Miller Tidelands, Thurston County, Washington

Dear Ian Child:

On March 18, 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 continue to cultivate 1.61 acres of geoduck clams on privately owned tidelands within 0.0ft to -3.6ft Mean Lower Low Water (MLLW) and 0.25 acres of Manila clams between +3.0ft and +0.5ft MLLW. Maintenance of the site would include routine inspections during low tide to ensure that equipment remains on site, and to ensure no entanglement of fish and wildlife. Access to the farm site will occur by boat or by upland.

Manila clams are hand-seeded over a 0.9-acre cultivation area. There are no frosting activities as part of this process. The clams are covered with predator exclusion nets (with 6-9mm mesh) secured to the sediment with rebar. The grow-out period can vary, but typically harvest takes place about a year after planting. Netting is removed prior to harvest and all harvest takes place by hand with a rake at low tide by about 3-4 workers.

To protect juvenile geoduck clams from predators, geoduck seed are placed in either PVC or Vexar mesh tubes that are pushed into the substrate (by hand for PVC tubes or using a low-pressure water jet for Vexar mesh tubes) at density not to exceed one tube per square foot. The tubes are all 4" in diameter and 12-16" in length and 3-5" of the tube will remain exposed above the substrate. PVC will be capped with individual mesh netting and secured with specialized rubber bands designed to withstand UV light and saltwater; mesh tubes will be secured using zip-ties or hog rings. Area nets may be placed over the tubes and weighed down with rebar stakes. Tubes and nets are removed after about 1-2 years after planting.

Geoduck are harvested either via dive harvest or beach harvest, although both use a motorized, low pressure water pump mounted on a vessel offshore. Water is delivered to the harvester at 20-

30 gallons per minute, and is similar to a garden hose at full volume. The end of the hose is equipped with a nozzle which is inserted into the substrate, softening the sand adjacent to the geoduck and allowing the clams to be removed by hand. Harvest occurs about 5-7 years after planting.

The project site is located on tidelands within Eld Inlet, on parcel numbers 12909330100 and 12909330200, adjacent to 7825 Urquhart Street NW, near Olympia, Thurston County, Washington; Section 9, Township 19 North, Range 2 West; WRIA 13, Deschutes Watershed.

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

If you have any questions regarding Ecology's consistency decision, please contact Teresa Pucylowski at [teressa.pucylowski@ecy.wa.gov](mailto: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:

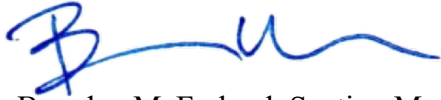
- File your appeal and a copy of this decision with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this decision on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

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

Sincerely,



Brenden McFarland, Section Manager  
Environmental Review and Transportation Section  
Shorelands and Environmental Assistance Program

e-cc: Aquaculture-Reinforcement-Team@usace.army.mil  
Meghan Fullam, Corps of Engineers  
Laura Hendricks, Coalition To Protect Puget Sound Habitat  
Amy van Saun, Center for Food Safety  
Teresa Pucylowski, Ecology  
Loreé Randall, Ecology  
ecyrefedpermits@ecy.wa.gov – Aquatics No. 139095