



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 16, 2021

Allen Shellfish, LLC
Attn: Brian Allen
PO Box 11775
Bainbridge Island, WA 98110

RE: Coastal Zone Consistency for Corps Reference No. **201700781**,
Stretch Island DNR Lease, Mason County, Washington

Dear Brian Allen:

On July 2, 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 a commercial shellfish aquaculture farm that cultivates geoduck clams on approximately 4.6 acres of state-owned tidelands between approximately +1.0ft and - 4.5ft Mean Lower Low Water elevation contours. There is no eelgrass present at this site. The site is maintained through site visits to ensure that gear is in place. All access is via boat; no upland access.

Planting occurs when juvenile geoduck seed are placed in flexible high-density polyethylene (HDPE) mesh sleeves (4 x 13 inches) which are pushed into the substrate to a depth of 6-7 inches (leaving 6-7 inches emergent) by using low-pressure pumped seawater that prepares the substrate for installation. The top of the mesh tube is left open. These mesh sleeves stay in place for the first 24-30 months after planting for predator deterrence and exclusion.

The mesh sleeves are UV-stable; designed and manufactured for marine application. Typically, tubes are installed at a density of one tube per 1-1.3 square feet and planted with 3-4 seed clams in each tube. The mesh sleeves are removed once the geoducks are large enough and they are left to grow unprotected until harvest (2-5 years). Polyvinyl chloride (or PVC) tubes and predator exclusion nets are not used. The farm is developed with multiple crops, on discrete timelines and is planted on a rotational basis.

Geoduck clams are harvested using either dry (i.e., during low tide exposure) or wet (i.e., diving) harvest methods. Dive harvest is the majority harvest activity. Market size clams are harvested individually using a low-pressure water pump. Once harvested, a new crop is planted and the aforementioned process is repeated. Total growing time is approximately 4-7 years.

The project site is located on tidelands within Case Inlet, on DNR parcel number 2237893, near Grapeview, Mason County, Washington; Section 9, Township 21 North, Range 1 West; WRIA 13, Deschutes Watershed.

Pursuant to Section 307(c)(3) of the Coastal Zone Management Act of 1972 as amended, Ecology concurs with Allen 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.

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

Stretch Island DNR Lease
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Sincerely,

Loree' Randall on behalf of Brenden McFarland

A handwritten signature in black ink that reads "Loree' Randall". The signature is written in a cursive, flowing style.

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

e-cc: Aquaculture-Reinforcement-Team@usace.army.mil
Colin Greenan, Corps of Engineers
Laura Hendricks, Coalition To Protect Puget Sound Habitat
Amy van Saun, Center for Food Safety
Teresa Pucylowski, Ecology
Loree Randall, Ecology
ecyrefedpermits@ecy.wa.gov – Aquatics No. 135713