



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000

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March 16, 2022

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

Re: Coastal Zone Consistency for Corps Reference No. **200701389**,
Roser Lease, Thurston County, Washington

Dear Brian Allen:

On February 10, 2022, 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 continuation of a commercial shellfish aquaculture farm that cultivates geoduck and oysters on 0.75 acres of privately-owned tidelands. Geoduck are cultivated on 0.54 acres between approximately +1.0ft and -4.0ft Mean Lower Low Water (MLLW) elevation contours, and oysters are cultivated adjacent to the geoduck on 0.17 acres up to the +3.0ft MLLW. There is no eelgrass present at this site. The site is maintained through site visits to ensure that gear is in place. Regular access is via boat; no regular 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, mesh sleeves 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. The mesh sleeves stay in for about 30 months before the removal process begins (or about

1/2 the culture period). Polyvinyl chloride (or PVC) tubes and predator exclusion nets are not used.

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.

Oysters are grown using bag-on-bottom culture. This type of culture includes the placement of hatchery produced juveniles inside flexible HDPE mesh lay-flat grow bags (industry standard), closed with plastic ties, and attached to anchored ground lines. It typically takes two years for oysters to grow to market size. At harvest, the bags and product are removed by hand. Cultivation of oysters is done rotationally, where multiple cohorts are cultured together and grow bags are continuously removed and replaced. Nursery tray (e.g. aqua tray) stacks are used concurrently with oyster production. Three or four Aqua tray stacks (3' x 3' x 3') are anchored to the bottom and are used to cultivate single oyster seed in high volume from 9mm to 15mm shell heights.

The project site is located on tidelands within Dana Passage, on parcel number 12912320500, adjacent to 7931 Zangle Road NE, near Olympia, Thurston County, Washington; Section 12, 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 Allen Shellfish, LLC's determination that the proposed work is consistent with Washington's CZMP.

If you have any questions regarding Ecology's consistency determination, 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

Filing an appeal with the PCHB:

Mailing Address:

Pollution Control Hearings Board
PO Box 40903
Olympia, WA 98504-0903

Street Address:

Pollution Control Hearings Board
1111 Israel RD SW
STE 301
Tumwater, WA 98501

Serving a copy of the appeal on Ecology:

Mailing Address:

Department of Ecology
Attn: Appeals Processing Desk
PO Box 47608
Olympia, WA 98504-7608

Street Address:

Department of Ecology
Attn: Appeals Processing Desk
300 Desmond Drive SE
Lacey, WA 98503

Sincerely,



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

E-cc: Aquaculture-Reinforcement-Team@usace.army.mil
Rory Lee, U.S. Army Corps of Engineers
Teresa Pucylowski, Ecology
Loreé Randall, Ecology
ecyrefedpermits@ecy.wa.gov