



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

May 20, 2022

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

Re: Coastal Zone Consistency for Corps Reference No. **202100043**,
Allen Shellfish LLC Peavey Geoduck Farm, 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. On December 6, 2021, Ecology and Allen Shellfish agreed to stay the CZM request to allow time for Allen Shellfish to obtain a shoreline permit. The current stay expires on June 2, 2022.

This determination is for the proposal to establish a commercial shellfish aquaculture farm that would cultivate geoduck clams on approximately 2.4 acres of privately-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 would be maintained through site visits to ensure that gear is in place. All access is via boat; no upland access.

Planting will occur 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 a low-pressure pumped seawater that prepares the substrate for installation. The top of the mesh sleeve will be 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, the sleeves will be 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 will be removed once the geoducks are large enough and they will be left to grow unprotected until harvest (2-5 years). Polyvinyl chloride (or PVC) tubes and predator exclusion nets will not be used. The farm will be developed with multiple crops, on discrete timelines which will be planted on a rotational basis.

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

The project site is located on tidelands within Case Inlet, on parcel numbers 12108-41-90061, 12108-41-90060, and 12108-41-90112, adjacent to 393 and 395 E Stretch Island Road, near Grapeview, Mason County, Washington; Section 8, Township 21 North, Range 1 West; WRIA 14, 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
Jacalen Printz, U.S. Army 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