



August 9, 2006

Mr. Michael Kain
Thurston County Development Services
2000 Lakeridge Drive SW
Olympia, Washington 98502-6045

Subject: Countywide Geoduck Shorelines Permit Application

Dear Mr. Kain:

Please find enclosed an application for a Programmatic Shoreline Permit for new geoduck operations in Thurston County. It is our understanding that Thurston County is requesting a Shoreline Substantial Development application for those areas in the county that do not have historical aquaculture use or have not been specifically identified (Bush/Callow Act tidelands) and designated as shellfish growing areas. The application submitted herein reflects that understanding.

The JARPA and State Environmental Checklist reference several documents. They include:

- **Geoduck Farming Fact Sheet and Overview**
- **Washington Geoduck Growers Environmental Codes of Practice**
- **Programmatic Biological Evaluation of Potential Impacts of Intertidal Geoduck Culture Facilities to Endangered Species and Essential Fish Habitat, dated October 17, 2004, prepared by Entrix, Inc.**
- **Geoduck Culture in Puget Sound: Environmental Interactions, prepared by the Pacific Shellfish Institute, dated August 7, 2006**
- **Comprehensive Literature Review and Synopsis of Issues Relating to Geoduck (*panopea abrupta*) Ecology and Aquaculture Production, prepared for Department of Natural Resources, dated February 6, 2004**
- **Guidance for Protection and Restoration of Nearshore Ecosystems in Puget Sound, prepared for the Puget Sound Nearshore Partnership**

Additionally, I have enclosed maps indicating the locations of the new farms. Parcel numbers and upland addresses will be provided under separate cover.

As we have discussed in recent meetings, we still question whether our aquaculture activities require a Shoreline Substantial Development permit and are continuing to

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review the legal aspects of that requirement. In the interim, however, we want to ensure compliance with your request of an application.

We will continue to work with you through this process in good faith and want to assure you of our willingness to resolve these issues.

Please contact me or Robin Downey to further discuss the application process.

Sincerely,

A handwritten signature in cursive script that reads "Diane Cooper". The signature is written in black ink and is positioned to the left of the typed name.

Diane Cooper
Taylor Shellfish
Representing Thurston County Geoduck Growers

c: Thurston County Geoduck Growers
Adam Gravley, Buck and Gordon