

# SEPA ENVIRONMENTAL CHECKLIST

## ***Purpose of checklist:***

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

## ***Instructions for applicants:***

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

## ***Instructions for Lead Agencies:***

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

## ***Use of checklist for nonproject proposals:***

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

## ***A. Background*** [\[HELP\]](#)

1. Name of proposed project, if applicable: Western Oyster DNR
2. Name of applicant: Annie Price

3. Address and phone number of applicant and contact person: PO Box 323 Silverdale, WA 98383. Phone: 360-692-3078

4. Date checklist prepared: 3/15/20

5. Agency requesting checklist: WA State DNR

6. Proposed timing or schedule (including phasing, if applicable): ASAP

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No, not at this time.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

AGENCY COMMENT: DNR has prepared a habitat stewardship report in anticipation of executing a lease.

JARPA Application

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

AGENCY COMMENT: Tenant is working with the Army Corps of Engineers to secure an Individual Permit for the proposed activities.

Yes, currently working with the Army Corp of Engineers.

10. List any government approvals or permits that will be needed for your proposal, if known.

Army Corp, WA State DOH, WDFW.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

This project is an existing shellfish farm and has been used for this purpose for several decades. We are utilizing low impact farming methods including shell bags to catch natural oyster set and clam nets. All harvesting and farming is done by hand and "in the dry", when the tide is low. Clams and oysters are harvested and removed from the tideland for sale, either carried off or longlined and picked up by a small boat at high tide.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

Coyle Peninsula, Dabob Bay. Section 28 Township 25N Range 01 West.

AGENCY COMMENT: The property is located entirely within Jefferson County.

## **B. Environmental Elements** [\[HELP\]](#)

### **1. Earth** [\[help\]](#)

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other \_\_\_\_Tidelands\_\_\_\_\_

b. What is the steepest slope on the site (approximate percent slope)?

Exact slope is unknown, gradual slope from top of the tidelands to the -4.5" tidal elevation.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Sand, mud, gravel, cobble and rock with oysters and clams present. No long term commercial significance and no soils will be removed.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Observation small slides from the adjacent upland properties but slides have not significantly negatively impacted the tidelands.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

N/A. No filling, excavation or grading proposed.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

N/A. No clearing or construction will be done.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

N/A, no impervious surfaces will be constructed.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

We will regularly maintain clam nets and oyster bags to prevent from being buried in the tidelands.

### **2. Air** [\[help\]](#)

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Exhaust from truck and small outboard engine. Quantities unknown. All harvesting and farming is done by hand, no exhaust is created from these activities.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No, this is a secluded tideland with no known nearby sources of emissions or odors.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Reduce engine idle time. Properly maintain vehicles/outboard engine to reduce emissions.

### 3. **Water** [\[help\]](#)

- a. Surface Water: [\[help\]](#)

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Yes, a small year round stream. Name unknown. This stream flows into Dabob Bay, a waterway in Hood Canal where tideland lease is located.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

Yes, all existing and proposed work is on the tidelands between mean high and mean low tidal elevations in Dabob Bay.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No fill or dredge material will be placed or removed from surface water or wetlands.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No surface water withdrawals or diversions.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

Unknown.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No waste materials will be discharged.

b. Ground Water: [\[help\]](#)

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

N/A. No groundwater will be withdrawn. No well needed at site.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

N/A. No septic tanks or systems on site.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Storm water from upland properties. Water flows through the stream and into Hood Canal.

- 2) Could waste materials enter ground or surface waters? If so, generally describe.

N/A. We do not use waste materials or chemicals. Grow bags/clam nets are designed for aquaculture use.

- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No, low impact farming and harvesting methods are used that do not effect the naturally occurring drainage patterns.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

No measures needed.

#### 4. **Plants** [\[help\]](#)

a. Check the types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other
- evergreen tree: fir, cedar, pine, other
- shrubs
- grass
- pasture
- crop or grain
- Orchards, vineyards or other permanent crops.
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, **eelgrass**, milfoil, other
- other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

No vegetation will be removed. Harvest/farming activities will take place away from eelgrass beds.

c. List threatened and endangered species known to be on or near the site.

Eelgrass and see below.

AGENCY COMMENT:  
DNR reviewed our own  
database and concurs  
with this statement.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

No landscaping will be done. Eelgrass will be preserved by creating a buffer so no harvesting/farming will take place in those areas.

e. List all noxious weeds and invasive species known to be on or near the site.

Unknown.

#### 5. **Animals** [\[help\]](#)

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include: (See below in **BOLD**)

birds: **hawk, heron, eagle**, songbirds, **other: Seagulls, shore birds, crows**, etc

mammals: deer, bear, elk, beaver, other:

fish: bass, **salmon, trout, herring, shellfish**, other \_\_\_\_\_

b. List any threatened and endangered species known to be on or near the site. **AGENCY COMMENT: DNR reviewed our own database and concurs with this statement.**  
Salmon; chum and chinook. Steelhead, trout, killer whales.

c. Is the site part of a migration route? If so, explain. **AGENCY COMMENT: All of western Washington is located within the Pacific Flyway for migratory birds.**  
Unknown.

d. Proposed measures to preserve or enhance wildlife, if any:

Wildlife will be persevered by complying with DNR Habitat Stewardship regulations. Regular maintenance of clams nets and oyster bags to ensure that they are properly secured to minimize entanglement of wildlife.

**AGENCY COMMENT: DNR has required additional mitigation measures for this proposal. See MDNS document for detailed mitigation measures.**

f. List any invasive animal species known to be on or near the site  
  
Varnish clams.

## **6. Energy and Natural Resources** [\[help\]](#)

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Fuel is used vehicles and boat. No heating used on site. No manufacturing on site.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No, no structures are created.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

Use a passenger vehicle to access tidelands if possible, to reduce amount of fuel used. Make a few of trips to the tideland as possible.

## **7. Environmental Health** [\[help\]](#)

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal?

If so, describe.

Potential of fuel spill from boat. Tank onboard is approximately 5 gallons. No toxic chemicals, flammable or hazardous waste materials are used on site.

- 1) Describe any known or possible contamination at the site from present or past uses.

No known or possible contamination known.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

No underground hazardous liquid or gas transmissions pipelines located on site.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

Small amounts of fuel (10 gallons) are stored on our boat. No other toxic or hazardous chemicals used on site.

- 4) Describe special emergency services that might be required.

Previously submit a spill plan to DNR.

- 5) Proposed measures to reduce or control environmental health hazards, if any:

Reference spill plan to ensure proper clean up.

*b. Noise*

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Engine noise created from vehicles and from a small outboard engine (currently we use a 35 hp engine).

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Operation noises include engine noise from vehicles and outboard engine. Hours of noise vary depending on tide which change seasonally.

- 3) Proposed measures to reduce or control noise impacts, if any:

Reduce engine idle time.

**8. Land and Shoreline Use** [\[help\]](#)

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

Upland properties are most commonly used as vacation properties. Adjacent tidelands used for recreation and are also leased for commercial shellfish harvesting/farming.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

Yes, site has historically been used as working farmlands. The amount of land that is used for farming will remain the same.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No oversized equipment or application of pesticides will be used. No tiling with equipment.. Harvesting of tidelands is all done by hand to minimize environmental impacts.

- b. Describe any structures on the site.

Oyster shell bags and clam cover nets. No other structures exist or are proposed.

- c. Will any structures be demolished? If so, what?

N/A, oyster shell bags and clam cover nets are simply removed when no longer needed.

- d. What is the current zoning classification of the site?

Tidelands.

- e. What is the current comprehensive plan designation of the site?

Unknown.

f. If applicable, what is the current shoreline master program designation of the site?

According to Jefferson County, no shoreline mast program is needed as this parcel is grandfathered in and no changes are proposed to the previous farming methods.

g. Has any part of the site been classified as a critical area by the city or county? If so, specify.

Yes, Dabob Bay is identified as a critical area under Jefferson County GMA.

h. Approximately how many people would reside or work in the completed project?

No one will reside in this area. Amont of workers per harvest tide will vary depending on the scope of the harvesting/farming. Average of 1-4 people per tide.

i. Approximately how many people would the completed project displace?

Zero.

j. Proposed measures to avoid or reduce displacement impacts, if any:

N/A, no one will be displaced by this project.

L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

N/A, this is an existing shellfish farm that is compatible with existing land use.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

N/A, this proposal will not impact forest land. Aquaculture is beneficial to water quality.

## 9. **Housing** [\[help\]](#)

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

N/A no units will be constructed.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

N/A no units will be eliminated.

c. Proposed measures to reduce or control housing impacts, if any:

N/A, this project will no create any housing impacts.

## **10. Aesthetics** [\[help\]](#)

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No structures are proposed. Clam nets will be flat against the tidelands and staked down with rebar. Oyster shell bags are approx.. 6" tall.

b. What views in the immediate vicinity would be altered or obstructed?

Clam nets and oyster bags will covered by the water and not visible at high tide. No views will be obstructed.

b. Proposed measures to reduce or control aesthetic impacts, if any:

Ensure that clam nets and oyster bags are secured properly and tidy.

## **11. Light and Glare** [\[help\]](#)

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

Headlamps are used when harvesting or farming during night time tides. These tidelands mostly occur during the fall and winter.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

No known safety hazards or interence with views.

c. What existing off-site sources of light or glare may affect your proposal?

Off-site sources of light are from the adjacent upland houses. These lights do not impact our proposal.

d. Proposed measures to reduce or control light and glare impacts, if any:

We use headlamps to illuminate our immediate work space. No known impacts.

## 12. Recreation [\[help\]](#)

- a. What designated and informal recreational opportunities are in the immediate vicinity?

Recreational shellfish harvesting, boating and beach access for private property owners.

- c. Would the proposed project displace any existing recreational uses? If so, describe.

No, recreational use will not be displaced.

- d. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

N/A, there will be areas of tidelands that are not under cultivation that will be accessible for recreation.

## 13. Historic and cultural preservation [\[help\]](#)

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

No.

AGENCY COMMENT:  
DNR has prepared  
supplemental answers to  
Question 13.

- c. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

No landmarks, features, material evidence, artifacts have been discovered.

- d. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

No known impact to cultural or historic resources.

- e. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

No known impact to cultural or historic resources.

#### 14. Transportation [\[help\]](#)

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

Access via Coyle (public road) and Payne Road (private road).

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

Unknown, we do not use public transportation to access tidelands.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

No parking spaces will be completed or eliminated.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

No improvements needed.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

One trip per day, arriving a few hours before the low tide. We currently use a passenger vehicle if we are not removing product/do not need to transport equipment. If we do need a truck, we use currently use a Ford F350. Or we access with a small boat/outboard engine. Tidelands are accessed year round.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No, we park out of the way when accessing the tidelands.

- h. Proposed measures to reduce or control transportation impacts, if any:

Park in a way to allow traffic to get by on private road.

**15. Public Services** [\[help\]](#)

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

No increased need for public services.

- b. Proposed measures to reduce or control direct impacts on public services, if any.

N/A, no direct impacts to public services.

**16. Utilities** [\[help\]](#)

- a. Circle utilities currently available at the site:  
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,  
other \_\_\_\_\_

No utilities available at site.

- e. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

No utilities are proposed. No construction activities planned.

**C. Signature** [\[HELP\]](#)

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: \_\_\_\_\_ *Annie M Price* \_\_\_\_\_

Name of signee \_\_\_\_\_ Annie Price \_\_\_\_\_

Position and Agency/Organization: Owner/member of A&K Shellfish DBA Dabob Bay Oyster Co

Date Submitted: \_\_\_ 3/15/20 \_\_\_\_\_

## DNR's supplemental answers

### 13. Historic and cultural preservation

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

**The Department of Archaeology and Historic Preservation (DAHP) Washington Information System for Architectural and Archaeological Records Data (WISAARD) database indicates no recorded archaeological sites within or immediately adjacent to the Western Oyster Properties leasehold (20-C09307). The DAHP WISAARD database indicates no buildings or structures listed on the National Register of Historic Places, nor does it indicate buildings or structures eligible for listing or buildings and structures with an eligibility status as not determined, within or immediately adjacent to the Western Oyster Properties leasehold (20-C09307).**

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

**A literature review was conducted. The DAHP WISAARD database indicates no archaeological site inventories and cultural resource surveys that have been conducted within or immediately adjacent to the Western Oyster Properties leasehold (20-C09307). Furthermore, the DAHP WISAARD database indicates no cultural resource survey reports that cover the geographic area of the Western Oyster Properties leasehold (20-C09307). Elmendorf and Kroeber (1992) describe a Twana Culture geographic place name located south of the Western Oyster Properties leasehold (20-C09307). This site is named, *sta'a'ltx'qs*, which means, "inside the point" and Elmendorf and Kroeber describe this site as, "Zelatched Point, a cove to its north, and a creek debouching into the latter... a camping site." Based on this description the camping site would be somewhere southerly, upland of and outside of the leasehold. However, the DAHP WISAARD database does not indicate that this potential archaeological site has ever been located and recorded. Lastly, a 2019 orthophoto indicates no structures within the Western Oyster Properties leasehold (20-C09307).**

**The result of this literature review: there is no recorded evidence of archaeological or cultural resources, including any evidence of Native American or historical use or occupation, nor any known evidence of human burials within or immediately adjacent to the Western Oyster Properties leasehold (20-C09307). While Elmendorf and Kroeber (1992) do describe a Twana culture camping site in the vicinity of the Western Oyster Properties leasehold (20-C09307), it is unlikely the camping site would have existed in the location of the leasehold due to the geographic location of the leasehold existing on the lower half of a stretch of tideland and furthermore, based on the camping site location description the leasehold is not immediately adjacent to the camping site's described location.**

#### References:

**Elmendorf W. W. and Kroeber A. L. (1992) *The Structure of the Twana Culture*, Washington State University Press: Pullman.**

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

**A cultural resource specialist for the Washington State Department of Natural Resources accessed the DHAP WISAARD database and reviewed archaeological site inventory reports and cultural resources reports related to the geographic area of the Western Oyster Properties leasehold (20-C09307) and determined that there are no recorded archaeological sites at the leasehold location.**

**Furthermore, the only General Land Office cadastral survey plat available for this area is from 1860 and it indicates no cultural or historic resources at or in the vicinity of the leasehold. LiDAR imagery was examined for significant archaeological features in the area of the leasehold but none were observed. Additionally, a 1937-62k and 1947-50k USGS topographic quadrangle map for the area of the leasehold were examined, both indicate no cultural or historic resources at or in the immediate vicinity of the leasehold. Despite the DAHP Washington Statewide Archaeology Predictive Model indicating a, “Survey Highly Advised: Very High Risk” status for the leasehold location, no archaeological field survey was conducted by DNR for the Western Oyster Properties leasehold (20-C09307), based on three reasons. Firstly, shellfish aquaculture has taken place at this location going back to at least 1959 (approximately 61 years, as indicated on DNR Aquatic Resources Index plate TS16-023) and there is no expansion of the footprint of this use. The second reason is based on the depth of disturbance. The clam nets are secured with rebar stakes to a relatively shallow depth of up to 12 inches and the oyster bags are secured with rope to cinder blocks that sit on the surface of the substrate. This level of disturbance is unlikely to have a significant effect on unknown cultural or historic resources. Lastly, the literature review and “desk” survey did not indicate the presence of recorded cultural or historic resources and examination of available historical records produced negative results.**

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

**There are no recorded cultural or historic resources for this leasehold location and this is an approximately 61 year old use with no planned expansion of the use footprint. Impacts to unknown cultural or historic resources are unlikely. No protection measures are currently planned. If a presently-unknown cultural resource is discovered during project operations, DNR will ensure the proponent is in compliance with the March 2010 Cultural Resources Inadvertent Discovery Guidance.**