



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 27, 2021

Pacific Shellfish, Nahcotta LLC  
Attn: Tim Morris  
1200 Robert Bush Drive  
South Bend, WA 98586

RE: Coastal Zone Consistency for Corps Reference No. **200701438**,  
Middle Sands, Pacific County, Washington

Dear Tim Morris:

On September 22, 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 proposed project to continue existing operations of 84.73 acres between +3.0 foot (ft.) and - 1.0 ft. Mean Lower Low Water (MLLW) tidal elevations. Access to tidelands is by boat from nearest public boat launch.

The company is currently growing Pacific Oysters (*Crassostrea gigas*) in two (2) ways at this location and Manila Clams (*Venerupis philippinarum*) and natural oyster recruitment.

(1) Oysters are grown on the ground using standard industry practices. The seed oysters are dispersed by boat at high tide and are harvested at high tide by boat or at low tide into tubs which are pulled at high tide by boat.

Bed Prep: Oysters are harvested or transplanted from the bed using harvest methods outlined below. No more than 1" of shell or gravel will be placed annually, as needed, if the substrate is enhanced for the purpose of oyster cultivation. Onsite inspections by farm management will be performed prior for any bed cleanup prior to planting.

Planting: The oysters are planted via a boat or scow at high tide.

Maintenance: Beds are harrowed periodically depending on the substrate conditions that are most often influenced by sediment deposition or burrowing shrimp densities.

Harvest: Oysters are harvested by hand at low tide or using mechanical harvest method (not hydraulic harvester). The crop cycle is 2-3 years depending on site specific conditions. Harvest will occur year-round.

(2) Oysters are grown off-bottom in the project area are on longlines or in rack and or bags.

Bed Prep: PVC pipes are pushed into the substrate to serve as a structure to hold the oysters above the substrate. In the case of longlines, notches are put into the pipe to hold the line(s). Bed prep activities are conducted on a low tide. Rack and or Bag, a larger diameter pipe is used and a mainline is strung to support the bags or baskets that are suspended from it. Bed prep activities are conducted on a low tide. Rebar or aluminum racks are used by the company as well to hold the bags or baskets off-bottom.

Planting: Using the longline method, seeded cultch strung into lines is suspended above the substrate on pipes that are driven on low tides. Hanging of the lines occurs at low tide rack and or bag, baskets or bags are collected onto a boat or skiff. Single oysters are put into a basket or bag at a specified density depending on their size. Baskets and or bags are hung on lines or put into the racks at the appropriate tide.

Maintenance: Beds are inspected at low tide to check the condition of oysters and gear. Any gear needing maintenance is fixed. Minimal crop maintenance occurs with longlines. Single oysters may need to be graded or have their densities split. Oftentimes the bag or basket has a float that is attached that tumbles the oysters, pruning the shell and keeping uniform growth. Baskets or bags may need to be cleaned of fouling. They typically get dried, and scraped or pressure washed depending on the location and time of year.

Harvest: Harvest can be done at low tide into tubs or at high tide by pulling them onto a boat using a machine. Harvest cycle is typically 2-3 years depending on growth and market demands. Rack and or Bag the baskets or bag are collected onto a vessel and then emptied into a tub or something similar. Empty bags or baskets are collected and stored appropriately. Harvest will occur year-round.

(3) Clams are grown on the ground in the project area are usually between 1 to 4 inches below the surface.

Bed Prep: Clams are harvested from the bed using harvest methods outlined below. No more than 1" of shell or gravel will be placed annually, as needed, if the substrate is enhanced for the purpose of oyster cultivation. Onsite inspections by farm management will be performed prior to any bed planting.

Planting: Clams are planted by hand and spread out over a bed during low water as the tide enters the bay. Anti-predation netting is placed over clams for the first year to assist survival.

Harvest: Clams are harvested by hand at low tide by diggers working by hand. The crop cycle is 2-3 years depending on site specific conditions. Harvest will occur year-round.

(1) Oysters Natural Catch: Oysters are grown on the ground using standard industry practices. The cleaned oyster shell is placed on an oyster bed by boat at high tide before the spawning

season and are harvested at high tide by boat or at low tide into tubs which are pulled at high tide by boat.

**Bed Prep:** Oysters are harvested or transplanted from the bed using harvest methods outlined below. Onsite inspections by farm management will be performed prior for any bed cleanup prior to planting.

**Planting:** The oysters shell is placed on an area by boat or scow at high tide prior to spawning season.

**Maintenance:** Beds are inspected by the farm managers for the substrate conditions that are most often influenced by sediment deposition or burrowing shrimp densities. No maintenance is performed.

**Harvest:** Oysters are harvested by hand at low tide or using mechanical harvest method (not hydraulic harvester). The crop cycle is 2-3 years depending on site specific conditions. Harvest will occur year-round.

The project site is located on tidelands within Willapa Bay, on parcel numbers 79004000098, 12113455393, 12113455318, 79004000100, and 79004000095 near Ocean Park, Pacific County, Washington; Section 27 and 34, Township 12 North, Range 11 West; WRIA 24, Willapa Watershed.

Pursuant to Section 307(c)(3) of the Coastal Zone Management Act of 1972 as amended, Ecology concurs with Pacific Shellfish, Nahcotta LLC's determination that the proposed work is consistent with Washington's CZMP.

If you have any questions regarding Ecology's consistency decision, please contact Marco Pinchot at [marco.pinchot@ecy.wa.gov](mailto:marco.pinchot@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**

<b>Street Addresses</b>	<b>Mailing Addresses</b>
<b>Department of Ecology</b> Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	<b>Department of Ecology</b> Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
<b>Pollution Control Hearings Board</b> 1111 Israel RD SW, STE 301 Tumwater, WA 98501	<b>Pollution Control Hearings Board</b> PO Box 40903 Olympia, WA 98504-0903

Sincerely,



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

e-cc: Aquaculture-Reinforcement-Team@usace.army.mil  
Christina Schroeder, Corps of Engineers  
Laura Hendricks, Coalition to Protect Puget Sound Habitat  
Amy van Saun, Center for Food Safety  
Marco Pinchot, Ecology  
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