



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

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

February 26, 2024

Goodro Shellfish  
ATTN: Joseph Schrieber  
PO Box 12551  
Olympia, WA 98508

Re: Coastal Zone Management Federal Consistency Decision for Merriman Shellfish Farm  
(Corps No. NWS-2009-0801), Hammersley Inlet, Shelton, Mason County, Washington

Dear Joseph Schreiber:

On November 3, 2023, the Department of Ecology (Ecology) received a Certification of Consistency with the Washington State Coastal Zone Management Program (CZMP) for the above project. Pursuant to Section 307(c)(3) of the Coastal Zone Management Act of 1972 as amended, Ecology concurs with Goodro Shellfish's determination that the proposed work is consistent with Washington's CZMP.

This project proposes to commercially cultivate up to 13 acres of Pacific oysters (*Crassostrea gigas*), Manila clams (*Venerupis philippinarum*), and Geoduck clams (*Panoepa abrupta*) between +7.0 feet (ft.) and -4.0 ft. Mean Lower Low Water (MLLW) tidal elevation on parcels 220302081620 and 22032080620. Access to tidelands is by boat.

Below is the cultivation and harvesting methods for this site location:

Manila Clams:

Juvenile seed will be dispersed onto the intertidal sediment once every couple of years and allowed to grow under clam nets. The clam harvest and seeding area is approximately 50 ft. in width and 900 ft. in length. Within this area, clam nets will be used to protect freshly seeded areas. The clam nets are 50 ft. by 15 ft. and will be placed in two rows that equals to 30 ft. width total where seed are planted. The nets will be secured along the perimeter with rebar hooks that do not protrude the sediment surface. The subsequent adults will be harvested by hand and placed in plastic mesh bags, which are carried by hand to the boat for removal to Goodro Shellfish's upland shop in Shelton, WA.

Naturally occurring manila clams will be harvested by hand using clam forks and placed in plastic mesh bags so they can be carried by hand to the boat for removal to Goodro Shellfish's upland shop in Shelton, WA.

Pacific Oysters (Ground Culture Method):

Juvenile seed will be dispersed onto the intertidal sediment and allowed to grow. The subsequent adults will be harvested by hand and placed in plastic mesh bags, which are then carried by hand to the boat for removal to Goodro Shellfish's upland shop in Shelton, WA.

Pacific Oysters (Pillow Bag Culture Method):

Oyster seed are placed into a black plastic mesh bag offsite. The seeded bags are then transported by boat to the property and are laid flat onto the beach. The bags are then secured by wires to ropes already laid on the beach. Ropes are secured to metal fence posts already on beach. When the oysters are ready to be harvested, the bags are untied from the rope, and oysters are unbagged onto the beach. Oysters are hand counted and loaded onto the boat, along with the used mesh bags. The boat then transports materials to Goodro Shellfish's upland shop in Shelton, WA.

Pacific Oysters (Rope Oyster Bag Culture Method):

Juvenile seed are placed into black plastic mesh pillow bags and are attached to rope by wire. This rope is attached to T posts approximately 1 ½ inches wide by 5 ft. long driven into sediment with 2 feet exposed and approximately 50 feet between posts. When the subsequent adults are ready for harvest, the bags are untied from the rope by hand and oysters are dumped onto the beach and are counted by hand. Product is then bagged and loaded onto the boat, along with the used mesh bags, to Goodro Shellfish's upland shop in Shelton, WA.

Geoduck Clams:

Prior to seeding activities, 4" gray PVC pipe will be depressed into the substrate by foot, approximately 1 pipe per square foot. The end above the substrate is covered with a black plastic mesh secured with a UV resistant band. Seeding activities occur either one of two ways:

- Scenario 1—juvenile geoduck clams are placed into the PVC pipes during high tide by divers, or
- Scenario 2—juvenile geoduck clams are placed into the PVC pipes during low tide by hand.

After juveniles are placed into the sediment, about 1 year later, the secured plastic mesh is removed by hand. PVC pipes are removed approximately 1 to 2 years after seeding, and a sprinkler system is utilized during warm summertime low tide events. Harvesting occurs between 5 to 8 years after seeding, where they are either harvested at low tide by hand or by

diver at high tide. In both scenarios, a stinger (PVC pipe with holes) is attached to a hose and gas-powered pump to loosen the substrate around the clam for harvesting. Clams are then bagged and removed by boat to Goodro Shellfish's upland shop in Shelton, WA.

The project site is located on tidelands within Hammersley Inlet, on parcels 220302081620 and 22032080620, adjacent to 123 SE Earsley Lane, near Shelton, Mason County, Washington; Section 30, Township 20 North, Range 2 West; WRIA 14, Kennedy-Goldsborough Watershed.

If you have any questions regarding Ecology's decision, please contact Teresa Pucylowski at (360) 764-0546.

## Your right to appeal

You have a right to appeal this decision to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt. 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 notice of appeal and a copy of this decision with the PCHB (see filing information below). "Filing" means actual receipt by the PCHB during regular business hours as defined in WAC 371-08-305 and -335. "Notice of appeal" is defined in WAC 371-08-340.
- Serve a copy of your notice of appeal and this decision on the Department of Ecology mail, in person, or by email (see addresses below).

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

## Filing an appeal

### Filing with the PCHB

For the most current information regarding filing with the PCHB, visit: <https://elaho.wa.gov/> or call: 360-664-9160.

### Service on Ecology

#### Street Addresses:

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

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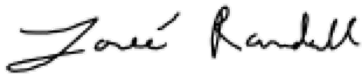
**Mailing Addresses:**

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

**E-Mail Address:**

ecologyappeals@ecy.wa.gov

Sincerely,

A handwritten signature in cursive script that reads "Loree' Randall".

Loree' Randall, Section Manager  
Aquatics Permitting & Protection Section  
Shorelands and Environmental Assistance Program

Sent via e-mail: goodroshellfish@comcast.net

E-cc: Danette Guy, U.S. Army Corps of Engineers  
Teresa Pucylowski, Ecology  
fedconsistency@ecy.wa.gov