



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

June 17, 2025

Nahcotta Clam Company
Attn: Tony Crete
27000 Sandridge Road
Ocean Park, Washington 98640

Re: Coastal Zone Management Federal Consistency Decision for Nahcotta Clam Company Farm (Corps No. **NWS-2025-133**), Willapa Bay, Nahcotta, Pacific County, Washington

Dear Tony:

On February 13, 2025, the Department of Ecology (Ecology) received a Certification of Consistency with the Washington State Coastal Zone Management Program (CZMP) for the above project. Ecology issued a 21-day public notice on March 28, 2025. Pursuant to Section 307(c)(3) of the Coastal Zone Management Act of 1972 as amended, Ecology concurs with Nahcotta Clam Company's determination that the proposed work is consistent with Washington's CZMP.

The proposed work includes shellfish aquaculture and harvest activities in Willapa Bay. The project proposes the farming of Manila clams (*Ruditapes philippinarum*) on intertidal land for sale for human consumption. The area includes one individual 10.5-acre parcel, where cultivation of Manila clams will occur on 2.44 acres. The Manila clam growing area ranges from 0 feet mean lower low water (MLLW) to +1 feet MLLW. This area also has natural sets of Pacific oysters (*Crassostrea gigas*) in 5.78 acres of the parcel from -1 feet to 0 feet MLLW that are harvested by hand and sold commercially. The remaining acreage (approximately 2.3 acres) is located above +1 feet MLLW and will not be cultivated but will be used for site access.

Planting culture methods: Hatchery-grown clams are seeded by hand directly onto the beach substrate. Natural spawning and setting of clams will also occur. After seeding, predator exclusion nets may be used to cover the clam bed, with edges anchored using rebar or buried in the substrate. Nets would remain in place until harvest, which generally takes 2-3 years.

Frosting (Graveling) methods: Prior to planting, clam beds are prepared by applying a thin layer of washed gravel mixed with shell fragments directly to the substrate (i.e., frosting). This activity will typically occur once every 2 to 4 years when the tide is high enough to float a barge or a skiff carrying the frosting material over the cultivation area. Material will be distributed evenly across the bed to a depth of less than 0.5 inches. Several thin layers of material may be placed over a period of days. A single 0.5-inch layer requires about 70 cubic yards (CY) of washed gravel or shell per acre.

Manila Clam and Pacific Oyster Hand Harvest Methods: Hand harvesters work during low tides using a clam rake for Manila clams or by hand for oysters every 2-3 years. Shovels or other hand operated tools may also be used. Market-size clams and oysters are selectively harvested, placed in buckets, bagged, tagged, and removed. Undersized shellfish are returned to beds for future harvests. Since a given clam bed may contain multiple year classes of clams and oysters, it may be harvested on a regular schedule to harvest individual year classes. Hand-picking disturbs the top 1-2 inches of sediment, and these effects persist for approximately 1 tidal cycle (Suhrbier et al. 2017). Dredging effects are not relevant to this area.

This activity is located in Willapa Bay, Pacific County, Washington, Section 27, Township 12 N., Range 11 E., within Water Resource Inventory Area (WRIA) 24 Willapa Bay.

If you have any questions regarding Ecology's decision, please contact Lydia Albright at Lydia.Albright@ecy.wa.gov or 360-870-2983.

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 by 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.

Address and Location Information

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

Mailing Addresses:

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

E-Mail Address:

ecologyappeals@ecy.wa.gov

Sincerely,



Maria Sandercock, Section Manager
Southwest Region
Shorelands and Environmental Assistance Program

Sent via e-mail: cameronsdaddy@outlook.com

E-cc: Johnathan Smith, U.S. Army Corps of Engineers
Marlene Meaders, Confluence Environmental Company
Erin Hanlon Brown, Ecology
Lydia Albright, Ecology
Zach Meyer, Ecology
fedconsistency@ecy.wa.gov