



May 31, 2023

Via Email: Luke.Viscusi@masonco.wa.gov

Mr. Luke Viscusi
Mason County
Planning Division of Community Development
615 W Alder St, Bldg 8
Shelton, WA 98584

RE: Shoreline Substantial Development and Shoreline Conditional Use Permit No.
SHR2023-00003

Dear Mr. Viscusi,

Thank you for your time and attention reviewing Taylor Shellfish Farms' proposal to cultivate oysters in a floating bag system under application number SHR2023-00003. As stated in the project's application materials, the proposal will be located within a 50-acre site in Oakland Bay, but the footprint of the project's cultivation gear will only occupy 9.1 acres (inclusive of the cultivation gear and the area of water in between the rows of gear). The project site is at least 1,000 feet from the shoreline, outside of normal navigation channels, and will include marine navigational markers to facilitate safe navigation around the project.

As also stated in the application materials, the project's cultivation gear could be temporarily removed from the site for a few weeks during any given year upon request by the Squaxin Island Tribe in order to facilitate fishing access. If this occurs, the gear will be temporarily located to a parcel owned by Taylor United (parcel no. 32015-10-80160) within Chapman Cove. This parcel is the site of an existing shellfish farm operated by Taylor Shellfish. Taylor's Chapman Cove shellfish farm pre-dates the Shoreline Management Act ("SMA") and the Mason County Shoreline Master Program ("SMP"). It has been farmed since at least 1875, and by Taylor Shellfish since it was purchased in 1969. Taylor currently farms oysters on this parcel using oyster bags, similar to what is proposed for the Oakland Bay farm.

Section 17.50.210(b)(1)(D) of the Mason County Code addresses existing aquaculture activities, such as those occurring on Taylor's Chapman Cove farm. It states that existing or permitted aquaculture operations are not subject to Section 17.50.120. It further states that maintenance, harvest, replanting, restocking, or changing culture technique or species cultivated for any existing or permitted aquaculture activity shall not require shoreline review or a new permit, unless or until (1) the operation changes the scope and intent of the original permit as defined in 17.50.400, or (2) the facility proposes to cultivate non-native species not previously cultivated in the State of Washington. Neither of these triggers for shoreline review or permitting would be met for placing the Oakland Bay floating bags at Taylor's Chapman Cove farm. The first trigger is not met because Taylor's Chapman Cove farm is an existing farm that did not require a SMA/SMP permit, and the second trigger is not met because the oysters that will



be cultivated in the system (namely, Pacific oysters) have previously been cultivated in Washington State.

If you have any questions related to this issue, please contact me at erine@taylorshellfish.com, or (360) 432-3348.

Sincerely,

A handwritten signature in blue ink, appearing to read "Erin Ewald". The signature is fluid and cursive, written in a professional style.

Erin Ewald
Taylor Shellfish
Shelton, WA 98584