

From: [BrownScott, Jennifer](#)
To: [Ralph Riccio](#)
Bcc: [Sylvia Pelizza](#); [OHara, Kevin](#); [Dexter, Nathan L](#)
Subject: Re: Project Proposal
Date: Thursday, June 9, 2016 3:48:01 PM

Ralph,

Thank you for providing the updated information on the Tribe's proposed aquaculture activities. This proposal gives us a better understanding of the activities and it will assist us as we conduct a thorough analysis of the proposal to determine if the proposed activities are compatible and do not negatively impact the refuge purposes. However, since a permit from ACOE and the County are necessary for DNR to issue a lease, it makes sense for us to begin our Compatibility Determination process after those permits have been granted (so we know the coarse scale project description will not change). We may also be able to use some of their SEPA and NEPA documentation to inform our process and reduce some of the overlap of efforts.

Upon a cursory review of the proposal, we found that we will need additional information including clarification on number of acres in each production stage at any given time, rotational schedule, how much access is required each month for each type of aquaculture activity and for what purpose, what is the mechanism that is being used for geoduck harvest, etc.

In addition, some proposed activities appear to have greater potential for impacts to wildlife and habitats than others (e.g., large scale netting, large numbers of people in the site, need to access the site multiple times per month throughout the year, activity during sensitive times, and activities that could have large impacts to the health of the mudflat substrate). Until these and other activities are assessed, we are unable to determine their compatibility.

It is important to note that the more impactful a practice is (e.g., causes wildlife mortality, increased disturbance, major or long-term changes to important habitat, or entrapment), the less likely it will be compatible with the purpose of the refuge.

Also, as we mentioned previously, we cannot provide a work window until compatibility is assessed. However, we will use the following information on high-use seasons for shorebirds and wintering waterfowl, as well as key periods for eelgrass to evaluate impacts of the proposal and, eventually, set work windows:

- Migrating shorebirds - mid-April through mid-May (spring migration) and August - October (fall migration).

- Over-wintering waterfowl and shorebirds - November through March.
- Suspended solids in the water column could negatively impact eelgrass during the growing season June - September (our best guess but will confirm with species experts).

We will be working directly with DNR, ACOE, and the County as NEPA and permits/leases are prepared.

Thanks again for working with us to find a way to meet your needs while maintaining compatibility with the purpose of Dungeness NWR.

Jennifer

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*~~Dungeness NWR~Protection Island NWR~San Juan Islands NWR~~
~~Copalis NWR~Flattery Rocks NWR~Quillayute Needles NWR~~*

On Wed, Jun 1, 2016 at 3:40 PM, Ralph Riccio <rriccio@jamestowntribe.org> wrote:

Thanks for the quick reply. Yes, this is the same one that will be submitted to the ACE and County. But first I would like for you to have an initial look at the proposal and let us know if there are any portions of it that will definitely not work for the Refuge. I would really like to adapt this document to something that will have the best chance for moving forward before submitting to other agencies. I am available to meet with you to discuss in person or by phone.

Great to hear that an eelgrass survey is scheduled! At least myself if not more folks would love to join you and volunteers to do a survey on July 1st. How many people would be helpful? When you have a chance, please send me the methods for conducting the survey so I can be familiar with them. Also, any progress on the cultural survey?

Please let me know if I can be of assistance.

Thanks again.

Ralph

From: BrownScott, Jennifer [mailto:jennifer_brownscott@fws.gov]

Sent: Wednesday, June 01, 2016 12:03 PM

To: Ralph Riccio

Subject: Re: Project Proposal

Ralph,

Sorry I missed your call earlier. Is this the same project description that will be submitted to ACE and the County for their permitting?

Battelle wanted to charge \$22,000 for a complete survey of the area, so we are now planning to do a presence absence survey with staff and volunteers and then go from there. We are trying to schedule July 1st as our survey day. There is a super low tide very early that morning. Let us know if you or anyone else would like to join us.

-jennifer

Jennifer Brown-Scott

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~~Copalis NWR~Flattery Rocks NWR~Quillayute Needles NWR~~

On Wed, Jun 1, 2016 at 11:41 AM, Ralph Riccio <rriccio@jamestowntribe.org> wrote:

Hello Jennifer,

Here is the project details form you asked for in April. Please let me know if you have any questions. I look forward to getting your feedback and finding a path that works well for both parties.

Thank you.

Ralph

Ralph Riccio

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