

**From:** [OHara, Kevin](#)  
**To:** [Pelizza, Sylvia](#)  
**Cc:** [BrownScott, Jennifer](#)  
**Subject:** Re: Aquaculture Response Draft 2  
**Date:** Monday, June 6, 2016 2:58:03 PM  
**Importance:** High

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It reads well. It let's them know we have some real and valid concerns, we need additional information, and we'll work with the permitting agencies as they go through the process. No one should reasonably expect more at this stage of the process. Thanks -Kevin

Kevin O'Hara  
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On Mon, Jun 6, 2016 at 2:48 PM, Pelizza, Sylvia <[sylvia\\_pelizza@fws.gov](mailto:sylvia_pelizza@fws.gov)> wrote:  
See how this reads.

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**Sylvia R. Pelizza**  
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On Mon, Jun 6, 2016 at 1:28 PM, BrownScott, Jennifer <[jennifer\\_brownscott@fws.gov](mailto:jennifer_brownscott@fws.gov)> wrote:

Here is my attempt to let Ralph know that there is more information that will be needed and that the current proposal throws up some red flags, without creating the appearance that any decisions have been made or analysis completed.

Please let me know if you see anything that doesn't make sense or would provide a different impression than what I was going for.

Thanks for all of your help,

Jennifer

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Ralph,

Thank you for providing additional information on your proposed aquaculture activities. It is really hard (if not impossible) for me to tell you what would or would not work at the Refuge without going through an analysis of the proposal. Since a permit from ACE and the County are necessary for DNR to issue the 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.

We will be looking at the proposal to see if it will negatively impact the purpose of the Refuge. We do that through a Compatibility Determination that is backed up by NEPA documentation. We will then let DNR know if there are any negative impacts so they can use that information in developing the lease. We will also provide information for the ACE and County permitting processes as needed.

After a quick look at the proposal, there is some additional clarification that will be necessary at some point (e.g., number of acres in each production stage at any given time, rotational schedule, how much access is required each month and for what, what is the mechanism that is being used for geoduck harvest, etc).

Some proposed activities would 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. However, 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. 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).

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