

**From:** [BrownScott, Jennifer](#)  
**To:** [Ralph Riccio](#)  
**Subject:** Work windows and e-copy of questions  
**Date:** Monday, April 4, 2016 1:13:11 PM  
**Attachments:** [Specific Information Needed to Assess Effects to Refuge Purpose.docx](#)  
**Importance:** High

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Ralph,

What a great meeting! I thought you might want an electronic copy of the additional information that we requested, so it is attached below.

I also wanted to get back with you on your request for work windows. At this point, we can't provide a work window since we do not have a detailed proposal to use in looking at the activities and how they may impact wildlife resources. That said, 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, help set work windows.

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

It seems like reduction of bird disturbance was used to reach the work window that is in the current lease (May 15 - July 30) because it lines up pretty closely with the dates mentioned above. Any non-ground disturbing activities taking place in June and July will most likely have the least impacts to wildlife resources and, therefore, be easier to accommodate.

Again, we are not setting a work window prior to evaluating your proposal. We did want to provide you with the dates that correspond to increased use of the area by wildlife so you could complete your proposal using as much information as possible, and plan activities to avoid sensitive times as much as possible.

Hope you find this information helpful.

-jennifer

## Specific Information Needed to Assess Effects to Refuge Purpose

April 1, 2016

In order to begin the Compatibility Determination process, a proposal must provide enough specificity for assessment of its potential impacts to Refuge wildlife and habitats. The current proposal (as provided in the most recent JARPA document on 3/29/2016) does not provide enough detail to assess compatibility with the purpose of Dungeness National Wildlife Refuge. The following list represents information that is necessary to begin evaluation of potential impacts to habitats and wildlife. As we assess the proposal, additional clarification may be needed

### Oyster Cultivation

For each of the Proposed Cultivation Methods (Spat – Natural production, Seed Oyster Planting, On-bottom Bags, Rack and Bag, Long Line) the following information is needed. Please provide the information separately for each method (e.g., Spat: x acres, x species, etc.; Rack and Bag: x acres, x species, etc).

- # acres
- Species
- Location within lease area
- Size of net and mesh
- Density of nets, lines, cages, bags, etc.
- Is access by land required for setup, maintenance, or harvest?
- Where are totes being stored?
- How are the oysters and nets secured/staked – density, height of stakes, nets and lines above ground. At what tidal elevations are they out of the water.
- A better description of all of the equipment necessary for each method (i.e., describe what I am seeing in the pictures)

	Dates (approx. range mo/yr)	Duration of site visit (#hrs/day/# days)	# People on site/day	Tidal Range for site visit	Chemical treatments of shellfish or habitat? Substance, dose, frequency, etc.)
Set up					
Maintenance					
Harvest					

### Geoduck Cultivation

- Location within the lease area
- Results of previous testing
- Acreage and location of previous testing
- How are the nets secured
- What is the mesh size of the nets
- What is the process for net removal
- How are the geoduck harvested
- It is stated that there is periodic sampling. When, how?

### General

- What is the definition of sensitive area as labeled on the site map?
- How will marine debris be monitored and removed?