

Ballard, Greg

From: Theismann, Chad on behalf of zDCDplan
Sent: Friday, April 06, 2018 9:02 AM
To: Ballard, Greg
Subject: FW: Oyster Farming proposal (External Email: USE Caution)

See below comment on oyster farm proposal

*Chad Theismann, Planner
Clallam County Dept. of Community Development
223 East 4th Street, Suite 5
Port Angeles, WA 98362
Phone 360-417-2420 Fax 360-417-2443
ctheismann@co.clallam.wa.us*

CLALLAM COUNTY DCD
EXHIBIT 41
DATE 4-13-18

From: Backe [<mailto:backe@olypen.com>]
Sent: Thursday, April 05, 2018 5:10 PM
To: zDCDplan
Subject: Oyster Farming proposal (External Email: USE Caution)

I'm writing about the proposed oyster farming operation in Dungeness Bay.

Please **don't** approve this application. It is **inside** a Wildlife Refuge. Surely there must be other places that can be used to farm Oysters. Putting this inside Dungeness Bay would adversely affect birds and other wildlife with the necessary increase in boat traffic and motors.

This place is a wildlife **refuge**. Please keep it that way.

Thanks for listening.

Tom Backe
Sequim

Monday



Sun to shine in Peninsula skies today A8



Finale frozen for M's

Last game of series against Twins now in May B1

PENINSULA DAILY NEWS

SOUND PUBLISHING INC.

Port Angeles-Sequim-West End

April 9, 2018 | 75¢

CLALLAM COUNTY DCD
EXHIBIT 42
DATE 4-13-18



URBAN FOREST

ROB OLLIKAINEN/PENINSULA DAILY NEWS

The tree-lined path at Jesse Webster park is shown Saturday. Port Angeles officials hope to reinstate the city in the Tree City USA program.

PA council looks to regain Tree City USA designation

City had been on Arbor Day program list for three years

By ROB OLLIKAINEN
PENINSULA DAILY NEWS

PORT ANGELES — Port Angeles has lost its designation as a tree city and the City Council wants it back. Urban forester Ben Thompson of the state Department of National Resources briefed the council last week on how the city can reclaim its position in the Arbor Day Foundation's Tree

City USA list. "If you designate authority and have a community tree board, if you have an ordinance on the books, if you track your activities and costs, and if you publicly recognize and celebrate trees, then that gets you into the Tree City USA program," Thompson told the council Tuesday.

There are 89 Washington cities on the Tree City USA roster, including 17-year member Port Townsend and second-year member Sequim.

Port Angeles had been on the Tree City USA list for three years when it was recently removed.

"The city joined the Tree City USA program with former employee Scott

Johns [an associate planner] kind of carrying the torch for that," Thompson said.

"Scott's no longer here, and I think that that may be a factor in the city's lapsing in the Tree City USA program.

"That doesn't mean that the existing staff aren't taking the issue seriously," Thompson added.

"I think it just underscores the challenge that especially a small city has to undertake so many things with limited budgets and limited staffing."

The city of Port Angeles has an ordinance that allows the city manager to designate a community forester.

TURN TO TREES/A4

Input on oyster farm is open

Comment period gets extended

By JESSE MAJOR
PENINSULA DAILY NEWS

PORT ANGELES — The Clallam County Hearing Examiner has extended the comment period for the Jamestown S'Klallam Tribe's plans to re-establish an oyster farm within the Dungeness National Wildlife Refuge.

Hearing Examiner Andrew Reeves decided Thursday to allow public comments through April 27. The Jamestown S'Klallam Tribe will have until May 18 to respond to public comments and the county Department of Community Development will provide a staff report by May 31.

The hearing will continue June 7. Reeves said that after the amount of information that was provided at the hearing Thursday, it would be necessary to extend the comment period to allow the public, county and tribe to provide additional comments and for the tribe to respond to concerns.

TURN TO OYSTERS/A4



JESSE MAJOR/PENINSULA DAILY NEWS

The Jamestown S'Klallam Tribe has plans to re-establish an oyster farm in Dungeness Bay.

PA man pleads not guilty to fish poaching



Was sentenced for illegal tree felling

By MICHAEL CARMAN
PENINSULA DAILY NEWS

FORKS — A day removed from receiving a 30-day sentence in federal court for felling and sectioning a big leaf maple tree

or steelhead during a closed season, unlawful recreational fishing in the second degree and avoiding a field inspection (refusing to present fish to a Fish and Wildlife officer). He was arrested

along the Quillayute River.

Richard Welches pleaded guilty March 26 to possessing wild steelhead, avoiding a field inspection and resisting arrest. He was sentenced to a total of 15 days in jail with credit for time served and a \$500 criminal wildlife penalty assessment.

sexual exploitation of a child induces explicit sexual performance, fourth-degree sexual exploitation of a child-possess video, fourth-degree internet exploitation of a child and fourth-degree internet luring of a child.

According to the affidavit for warrant of arrest:

On March 26, Hansel said he meets up with a 15-year old boy one to two times per week. Hansel sent multiple photos of a 15-year-old boy, and a photo of himself during the explicit text correspondence with the Washington state undercover detective.

On March 28, Washington State Patrol continued the text conversation and Hansel sent photos and a video clip of a 14-year-old male.

Hansel texted that he was planning to visit the Seattle area in May or June

son County, but we were communicating with people online, and that means we have different jurisdiction and states involved. We will be following up on all communications, and the investigation continues."

Law enforcement authorities in Clallam, Jefferson and Kitsap counties are continuing to investigate, according to Clallam County Chief Criminal Deputy Brian King on March 30.

He said that detectives were following up on internet contacts that 40-65 more people had with the undercover officers during the four-day operation out of a house that the State Patrol rented in the Port Hadlock area.

Jefferson County Editor/Reporter Jeannie McMacken can be reached at 360-385-2335 or at jmcmacken@peninsuladailynews.com.

that this year because we're just finding out about this but we will find another day as soon as we can," City Councilwoman Cherie Kidd said.

Many cities in Washington celebrate Arbor Day in October or November, Thompson said.

"The Arbor Day legacy is to celebrate in the spring, but here in Washington, our best planting season is really late September even through February," Thompson said.

Thompson outlined the benefits of having an urban forestry program and the "ecosystem services" that trees provide.

Unlike built infrastruc-

Oysters: Farm would be on 34 acres of land

CONTINUED FROM A1

The tribe's oyster farm would be on 50 acres of leased Department of Natural Resources tideland within the Dungeness National Wildlife Refuge, said Ron Allen, tribal chairman. The farm would be in the bay about 4,000 feet north of Cline Spit.

The area has historically been used for oyster farming since before 1953 through a succession of private owners.

The tribe purchased the farm in 1990 and operated it for a few years before it was decertified due to contamination in the bay.

The state Department of Health warned about deteriorating water quality in the bay in 1995 and closed portions of the bay in 1997, 1999 and 2003, mostly because of fecal coliform. The oyster operation was then closed in 2005, according to county records.

The farm itself would be on 34 acres of the leased

The area has historically been used for oyster farming since before 1953 through a succession of private owners.

land, leaving 25 foot buffers for conservation of eelgrass, according to county documents.

For the project to move forward, the tribe must secure a number of permits, including a shoreline conditional use permit and a substantial development permit from Clallam County.

Tribal officials have said they hope the permitting process goes smoothly and the tribe could begin planting oysters in spring of next year.

Reporter Jesse Major can be reached at 360-452-2345, ext. 56250, or at jmajor@peninsula-dailynews.com.

Fish: Sentenced

CONTINUED FROM A1

Wood retrieved from that supplier matched the wood from the felled maple, investigators said.

The value of the timber as music wood was estimated to be \$8,766.

Michael Welches pleaded guilty to the timber theft Oct. 12 and received a 30-day sentence Jan. 19 in U.S. District Court in Tacoma.

Hutto was sentenced to 60 days in prison to be followed by two years probation Feb. 16.

He pleaded guilty in federal court Oct. 6, 2017, to one count of depredation of government property.

Richard Welches was indicted Feb. 2 on one count of depredation of government property and was ordered to appear in federal court to answer to the indictment May 8. He was booked in the Clallam County jail Feb. 8 on a multitude of charges and remains incarcerated.

Hovey's two counts of unlawful recreational fishing were amended to unclassified fishing violations. She must pay two \$150 fines for the violations as well as \$200 in court costs.

"That area of the river is a troublesome poaching area that is notorious for poaching."

A routine drift boat patrol conducted by Fish and Wildlife Police Sgt. Kit Rosenberger and Officer Bryan Davidson near Leyendecker Park uncovered the illegal fishing activity, they said.

"That area of the river can be kind of a troublesome poaching area for us," Rosenberger said. "It's an area that is notorious for poaching activities."

The officers noticed two men and a woman fishing with five rods and made contact with the younger Welches first, obtaining his identification and discovering he lacked a valid fishing license and was fishing an unlawful second rod, they said.

"It appeared they were just there for the day fishing," Rosenberger said. "They had brought in a wheelbarrow with firewood, set up an umbrella and had a lunch ready."

Michael Welches and Hovey also were contacted

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<http://marketplace.peninsuladailynews.com/>
CLASSIFIED OF THE DAY

Papa Murphy's
TAKE 'N' BAKE PIZZA
PORT ANGELES location only!

Ballard, Greg

From: Clark, Donella on behalf of zDCDplan
Sent: Monday, April 09, 2018 10:02 AM
To: Ballard, Greg
Subject: FW: Aquaculture Project at the DNWR (External Email: USE Caution)

From: Stephen G. Norton [<mailto:sgnorton@hotmail.com>]
Sent: Sunday, April 08, 2018 9:32 AM
To: zDCDplan
Subject: Fw: Aquaculture Project at the DNWR (External Email: USE Caution)

Public Comment: SHR2017-00011

CLALLAM COUNTY DCD
EXHIBIT 43
DATE 4-13-18

From: Stephen G. Norton <sgnorton@hotmail.com>
Sent: Sunday, April 8, 2018 12:27 PM
To: dcdplan@co.clallam.wa.us
Subject: Aquaculture Project at the DNWR

I am 100% against this development - there are many other places this venture can utilize. A significant migration of birds fly through this area each year coming north and going south. Giving these birds a peaceful and undisturbed place to rest in route is critical. Allowing this development places this scenario in senseless jeopardy. And to allow one commercial development sets the precedence for another commercial development.

Ballard, Greg

From: Clark, Donella on behalf of zDCDplan
Sent: Monday, April 09, 2018 10:03 AM
To: Ballard, Greg
Subject: FW: In favor of the oyster farm (External Email: USE Caution)

CLATSOP COUNTY DCD
SERIAL 44
DATE 4-13-18

-----Original Message-----

From: Diane Whitmore [<mailto:dwhitmore@exploratorium.edu>]
Sent: Saturday, April 07, 2018 8:21 PM
To: zDCDplan
Subject: In favor of the oyster farm (External Email: USE Caution)

It's an important local, sustainable industry that seems thoughtful in its planning and roll out timeline. It's unfortunate and a bit depressing to imagine unrealistic and alarming opposition. This isn't an Icycle Foods Atlantic salmon farm. It appears to be a smart, small but steadily growing operation with iterations as a risk abatement strategy, all within a treaty agreement that should not be disregarded.

Ballard, Greg

From: Clark, Donella on behalf of zDCDplan
Sent: Monday, April 09, 2018 10:03 AM
To: Ballard, Greg
Subject: FW: Public Comment SHR 2017-00011 (External Email: USE Caution)

From: warren c mecca [<mailto:meccanator@hotmail.com>]
Sent: Saturday, April 07, 2018 2:39 PM
To: zDCDplan
Subject: Public Comment SHR 2017-00011 (External Email: USE Caution)

CLALLAM COUNTY DOD
EXHIBIT 45
DATE 4-13-18

I hope to see the aquaculture project at the Dungeness Spit severely limited if not completely restricted. The refuge is slowly returning to its natural state free of sewage toxins and other man made intrusions. It is a special place as recognized and dedicated in 1915 and should continue to be protected in the most conservative manner.

Keep the refuge a refuge.

Sent from [Out](#)

**BEFORE THE HEARING EXAMINER
FOR CLALLAM COUNTY**

In the Matter of the Application of)
)
)
Jamestown S'Klallam Tribe)
)
For a Shoreline Substantial Development)
Permit and a Shoreline Conditional)
Use Permit)

No. SHR2017-00011

CLALLAM COUNTY DCD
EXHIBIT 46
DATE 4-13-18

POST-HEARING ORDER

TO: PARTIES OF RECORD

The Hearing Examiner held an open record hearing on April 5, 2018, on the above referenced request for a Shoreline Substantial Development Permit and a Shoreline Conditional Use Permit. At the hearing, a substantial amount of new information was submitted for the record. The Hearing Examiner determined that it would be appropriate to allow for additional time to evaluate the application and newly submitted information and that the hearing should be continued under CCC 29.13.200. With agreement of the Applicant Representative and the County, the open record hearing shall be continued to **1:00 PM, June 7, 2018**.

The Hearing Examiner also determined that additional public comment to the County on the proposal would be allowed until the close of business on **April 27, 2018**; that the Applicant shall provide any response to the County by **May 18, 2018**; and that the County shall provide a supplemental staff report and copies of submitted material to the Hearing Examiner by **May 31, 2018**. In addition, the County indicated that it would provide published notice of the continued hearing and the April 27th deadline for public comments.

SO ORDERED this 6th day of April 2018.



Andrew M. Reeves
Hearing Examiner
Sound Law Center

Ballard, Greg

From: Clark, Donella on behalf of zDCDplan
Sent: Tuesday, April 10, 2018 8:17 AM
To: Gray, Steve; Ballard, Greg
Subject: FW: Public Comment: SHR2017-00011 (External Email: USE Caution)

From: Jess Christiansen [mailto:housedarkmountain@gmail.com]
Sent: Monday, April 09, 2018 11:28 PM
To: zDCDplan
Subject: Public Comment: SHR2017-00011 (External Email: USE Caution)

CLALLAM COUNTY DCD
EXHIBIT 47
DATE 4-13-18

Dear Mr. Gray,

I am a U.S. Fish & Wildlife volunteer, vice-president of the BoD of Friends of Dungeness National Wildlife Refuge, and head of the Environmental Restoration committee there. However, I am writing this letter to you strictly as a private citizen of Clallam County. I have no authority to speak for either the Refuge or the Friends' Board, and have not cleared my remarks with anybody who does. The following are my own personal opinions and observations, no one else's.

I attended the hearing on April 12th. The Jamestown S'Klallam Tribe Corporation's power-point presentation was very slick and professional, but while it avoided telling actual lies, it certainly was nothing close to the truth. The fact that the JST Corporation has been trying to push this permit through as quietly as possible ought to raise some serious red flags just by itself: they KNOW this community does not want an industrial eyesore constructed in the middle of our beloved and unique National Wildlife Refuge.

Make no mistake, it WILL be an eyesore. 150,000 ugly black bags chained in rows across 34 acres of tidelands! We saw from the aerial photographs just how awful it will look, and how far it will be visible - a lot farther than the "<100 yards" claimed. JST Corporation says this huge, unsightly structure will "only" be visible during minus tides - maybe that's true, but there are over a hundred daytime minus tides between April and September every year! Dungeness National Wildlife Refuge receives over 100,000 visitors per year, the vast majority of them during the summer minus tides. People come from all over the world to photograph our unspoiled scenic wilderness. Now JST Corporation is proposing to spoil their view for corporate profit. Why should tourists travel thousands of miles to take pictures of a factory farm? What effect will it have on Clallam County's economy if they don't?

JST Corporation's presentation very neatly avoided any mention of two very significant species: the black brant and the European green crab. Dungeness National Wildlife Refuge was founded in 1915 specifically to protect the brant, which spend their winters in Dungeness Bay, right in the very place where JST Corporation wants to put their operation. These are wild, migratory birds, so shy that they are disturbed by ANY human activity on the bay side of the Spit. Oysters are harvested in the winter months, when the minus tides take place at night. What will it do to the brants to be disturbed by lights and motorboats night after night - "12 days a month" - in the winter darkness when they can't fly away?

For that matter, what will the hundreds of brants do to the oysters? Fecal coliform levels in the bay may be acceptable right now, but if those mesh oyster bags are right under the flocks, won't they collect bacteria just like a dirty sponge in the bottom of a sink? "Growing food in goose-poop soup" - yuck!

How kind of JST Corporation to say they'll put a 25-foot buffer between their industrial structure and the tufts of eelgrass that were observed during the last survey. The area under discussion has had 12 years to recover from the environmental degradation inflicted on it by earlier human industry - if it's left alone, there will be still more recovery. If it's not left alone, there will be still more degradation. Their attorney's claim that the JST Corporation has been "good stewards of the environment" is not 100% accurate, as their aquaculture operations in the past (including dredging) caused lasting damage to Dungeness Bay's eco-system. Now they are proposing to damage it irreparably - indirectly, perhaps, but hardly unknowingly.

The European green crab is one of the worst invasive species on the planet. Since April 2017 when green crab was found in Dungeness Bay, our volunteers at the Refuge have been out in all weathers every week, to try to contain the invasion. JST Corporation's presentation boasted that their oyster bags would "provide shelter for juvenile Dungeness crab" - no mention of the fact that their proposed farm is right in the 'hot spot' where the European green crab are being trapped. Put those bags out there, and we might just as well surrender to the green crab right now, because once they hide under that junk, there will be NO way to get them out! In ten years, there may be NO Dungeness crab, NO native shellfish, NO eel-grass and NO BRANTS (since they depend on the eel-grass) in Dungeness Bay - nothing but JST Corporation's farmed, non-native Pacific oysters.

The green crabs in Dungeness Bay apparently all came from just one brood-cell (egg cluster.) That's how invasive they are. If they can't be contained in Dungeness Bay, how long will it be before they infest Sequim Bay as well, and destroy the benthic eco-systems there too? Is JST Corporation really ignorant of this serious threat, or are they just choosing to ignore it for the sake of their shareholder profits?

Others at the April 12 hearing spoke cogently on the topic of plastic pollution. JST Corporation claims its equipment wouldn't be a 'major' source of micro-plastics - a highly questionable opinion in light of the research, especially since they admit that they would use zip-ties to close the bags. Plastic degrades in salt water - there's no way to prevent that - and the smaller it breaks down, the deadlier it is in the environment. The Refuge volunteers spend hundreds of hours every month, cleaning up as much plastic as we can on the Spit - now JST Corporation wants to dump a lot more out there. How is this even MARGINALLY legal in the midst of a National Wildlife Refuge, one of the most important sanctuaries for migratory birds in the world?

I could go on, but I'm sure you have many other e-mails to read. Please do the right thing for the citizens of Clallam County and the beautiful wild creatures of Dungeness National Wildlife Refuge, and deny the permit for this highly destructive, short-sighted, profit-motivated proposal.

Again, these are entirely my own words and thoughts as a private citizen - I speak for no one but myself.

Thank you for your kind attention,

C. Jessie Christiansen
910 N. Beverage St.
Sequim, WA 98382

**BEFORE THE HEARING EXAMINER
FOR CLALLAM COUNTY**

In the Matter of the Application of) No. SHR2017-00011
)
)
Jamestown S'Klallam Tribe)
)
For a Shoreline Substantial Development)
Permit and a Shoreline Conditional)
Use Permit) **POST-HEARING ORDER**
(Revised April 11, 2018)

TO: PARTIES OF RECORD

The Hearing Examiner held an open record hearing on April 5, 2018, on the above referenced request for a Shoreline Substantial Development Permit and a Shoreline Conditional Use Permit. On April 6, 2018, the Hearing Examiner issued a post-hearing order on the matter. That order explained:

- With agreement of the Applicant Representative and the County, the open record hearing shall be continued to **1:00 PM, June 7, 2018**.
- Additional public comment to the County on the proposal would be allowed until the close of business on **April 27, 2018**.
- The Applicant shall provide any response to public comment to the County by **May 18, 2018**.
- The County shall provide a supplemental staff report and copies of submitted material to the Hearing Examiner by **May 31, 2018**.¹

The County received a request to clarify the post-hearing order. Specifically, County staff received the following inquiries from the public:

- Whether public comment would be allowed specifically regarding the Applicant's response (due May 18th) and/or the County's supplemental staff report (due May 31st). And if so, when and how would comment(s) be allowed?
- Whether oral and/or written testimony would be allowed at the June 7th hearing?

¹ The County also indicated it would provide published notice of the continued hearing and the April 27, 2018, deadline for additional public comments.

*Post-Hearing Order (Revised April 11, 2018)
Clallam County Hearing Examiner
Jamestown S'Klallam Tribe Shoreline Substantial
Development Permit and Shoreline Conditional Use Permit
No. SHR2017-00011*

In response to the public inquiries, the post-hearing order does not provide for a specific comment period for the public to respond to the Applicant's response to additional public comment or to the supplemental staff report. Although public comment on any proposal is encouraged—and this hearing has been continued precisely to allow the public an additional 21 days to review and comment on the proposal—an additional public comment period to allow public comments specifically regarding the Applicant's response to public comments on the proposal, or to the County's supplemental staff report, is not warranted.

That said, public testimony will be welcome at the continued hearing on June 7, 2018, and any specific comments or concerns that members of the public would like to make known about the Applicant's response to additional public comments or to the supplemental staff report may be made, through oral or written testimony, at the continued hearing.

SO ORDERED this 11th day of April 2018.



Andrew M. Reeves
Hearing Examiner
Sound Law Center

Ballard, Greg

From: Wendy Feltham <wfeltham9@gmail.com>
Sent: Wednesday, April 11, 2018 7:18 AM
To: Ballard, Greg
Subject: Dungeness Spit Oyster Farm Application (External Email: USE Caution)

CLALLAM COUNTY DCD
EXHIBIT 49
DATE 4-13-18

Dear Mr. Ballard,

I am writing to express my concern about the application for the Dungeness Spit Oyster Farm. I am concerned both as a frequent visitor to Dungeness Spit and as a long-time volunteer involved in several citizen science projects in Jefferson County-- Seattle Audubon Seabird Survey, UW/WSG Green Crab project, Port Townsend Marine Science Center's Marine Mammal Stranding Network, and Port Townsend Marine Science Center's Protection Island Aquatic Reserve committee.

I've heard of a letter written to Steve Gray, the Clallam County Deputy Director and Planning Manager, by Jennifer Brown-Scott, the Project Leader for the Department of the Interior, that has raised significant questions about issues concerning the application. I echo these concerns, and encourage you to deny the permit for an oyster aquaculture farm within the Dungeness Spit Wildlife Refuge.

President Woodrow Wilson established the Dungeness National Wildlife Refuge over 100 years ago as a refuge, preserve, and breeding ground for native birds. This is an essential place for migrating shorebirds in spring and fall; a safe place for wintering waterfowl, harbor seals, and their pups; and a critical area with established eelgrass beds for young salmon and steelhead.

I would greatly appreciate it if you would confirm receipt of my email. I also would greatly appreciate it if you would please keep me informed about this issue.

Sincerely,
Wendy Feltham
Port Townsend

Ballard, Greg

From: Clark, Donella on behalf of zDCDplan
Sent: Wednesday, April 11, 2018 8:17 AM
To: Ballard, Greg
Subject: FW: Public Comment: SHR2017-00011

CLALLAM COUNTY DCD
EXHIBIT 50
DATE 4-13-18

-----Original Message-----

From: Russ Mellon [<mailto:russ@olympen.com>]
Sent: Tuesday, April 10, 2018 6:43 PM
To: zDCDplan
Subject: Public Comment: SHR2017-00011

To: dcdplan@co.clallam.wa.us (Clallam County Community Development Case # SHR2017-00011)

This message was sent via the Clallam Website Email Form 04-10-2018.

Case ID: SHR2017-00011

Russ Mellon
russ@olympen.com
512 Clark Road
Sequim WA 98382

In regards to SHR2017-00011 I'm not opposed to the Jamestown S'Klallam Tribe raising oysters on the DNR leased land as long as the oysters raised there are sold for consumption inside the State of Washington. Non-tribal members pay for our State licenses for the right to harvest up to 18 oysters per person from various locations within the State. The tribes should have to pay a license and then sell the oysters within the jurisdiction of the agency issuing the permit. The water inside Dungeness Bay has become clean enough through the effort of several groups of stakeholders. The Tribe should not benefit from profits made by harvesting locally grown oysters, unless they are sold locally (within the State).

Russ Mellon
512 Clark Road
Sequim, WA 98382

360-460-2862

Ballard, Greg

From: Dixtun Baby Angel <dixtunbabyangel@gmail.com>
Sent: Wednesday, April 11, 2018 1:19 PM
To: Ballard, Greg
Subject: Comments for Oyster Farm Application (External Email: USE Caution)

I am a local resident of Puget Sound in Seattle. The mayyer of oyster farms has come to my attention. All artificial farms are a bad idea. This should not be supported. We've seen the negative effects of fish farms; oyster farms would be the same way. Such artificial setups are bad for the environment, the animals involved, and their wild counterparts, by letting sickness and disease from farmed beings seep into the wild. This should not be done; this area is supposed to be a wildlife refuge.

Signed,
A. Dunne

CLALLAM COUNTY BOB
EXHIBIT 51
DATE 4-13-18

Ballard, Greg

From: Clark, Donella on behalf of zDCDplan
Sent: Wednesday, April 11, 2018 2:23 PM
To: Ballard, Greg
Subject: FW: Public Comment: SHR2017-00011 (External Email: USE Caution)

From: Grant Rollins [<mailto:bahtahpicasa@gmail.com>]
Sent: Wednesday, April 11, 2018 12:34 PM
To: zDCDplan
Subject: Public Comment: SHR2017-00011 (External Email: USE Caution)

CLALLAM COUNTY DCD
EXHIBIT 52
DATE 4-13-18

To whom it may concern;

Now that the Dungeness Bay is returning to acceptable water quality levels, we should not be introducing activities that will not only effect water quality but wildlife on a National Wildlife Refuge.

The Bottom Culture Method of farming may be attractive for reasons other than environmental, such as lower operating cost however there are disadvantages that I did not see mentioned in any of the available material I read. Oysters are filtration feeders which means a reduction in plankton and algae for other species. There will also be an increase in siltation which means water clarity will be reduced. I see a proposal for a large number of bags which translates to a huge environmental effect on a very sensitive eco system that is just now in the stages of recovery. In addition to the natural increase in siltation from the oysters, it was mentioned that the oysters would be spread on the bottom, out of the bags once they reach maturity. How are the oysters harvested off the bottom without spreading sediment into the existing eel grass areas outside the leased boundaries?

Another concern is the effects of natural predators (Crabs, Starfish, and Seabirds) and the location the proposed oyster farm. I am concerned that protected Seabirds may be killed when they go after the oysters in exposed bags on minus tides. The Dungeness Spit provides protection of the Tide flats that are nutrient-rich for nesting and migrating birds. Those protections need to continue without the threat of commercial use. There are several other natural predators that may require chemicals to control, are any chemicals proposed for predator control at the proposed site? The Green Crab is already an issue in Washington and are actively trapped by USFWS on the Dungeness Spit. While they eat clams they also eat oysters. Is the introduction of oyster seed to Dungeness Bay going to cause an increase in the Green Crab problem?

I have seen the plastic bags that are used for Oyster farming on the local shore. Some bags will go adrift and land on Dungeness Spit, damaging the eel grass in the process. The State of Washington is trying to increase the amount of eel grass and quantify its benefits. The fact that eel grass has entered the lease area would suggest that the eel grass is trying to expand along the shore. Placing plastic bags on the bottom can only reduce that effort. Bags will be exposed during minus tides when birds like to feed, exposing them to increased danger of injury.

Maybe some type of Lease swap to another State Controlled location would be better for all concerned.

Thank You,

Grant Rollins

Ballard, Greg

From: Clark, Donella on behalf of zDCDplan
Sent: Thursday, April 12, 2018 9:51 AM
To: Gray, Steve; Ballard, Greg
Subject: FW: Public comment SHR2017-00011 (External Email: USE Caution)

From: Carl Siver [<mailto:cgsiver@outlook.com>]
Sent: Thursday, April 12, 2018 9:47 AM
To: zDCDplan
Subject: Public comment SHR2017-00011 (External Email: USE Caution)

CLALLAM COUNTY DCD
EXHIBIT 53
DATE 4-13-18

Mr. Steve Gray,

I would like it noted that I am strongly opposed to application of any aquaculture activity or any other commercial enterprise by tribal or non-tribal organization within the Dungeness Wild Life Refuge. My objection is based on the premise that the Dungeness Wild Life Refuge is just that, a refuge for wild life (both marine and land based). If a commercial operation can not be sustained or economically justified without the usurping of federal land or designated refuge protectorate then the enterprise should not operate or should look to sites that do not impact on a refuge.

Thank you for noting my above comment.

Carl Siver

Ballard, Greg

From: Katherine Jensen <kathjensen@gmail.com>
Sent: Thursday, April 12, 2018 5:05 PM
To: Ballard, Greg
Subject: Re: Dungeness Spit Wildlife Refuge and Oyster Aquaculture (External Email: USE Caution)

CLALLAM COUNTY DCD
EXHIBIT 54
DATE 4-13-18

(Sorry about two emails - my errant finger slipped.)

My objection to this enterprise is based on many factors, but I'll just mention two in order not to take up too much of your time. Issuing permission for the Oyster Aquaculture enterprise directly violates the meaning of the word "**refuge**". Surely in this wide, wide world, there are other sites this business could have selected. There is only one Dungeness Spit National Wildlife Refuge. In view of the recent disastrous maintenance failings of salmon farms in Puget Sound, it seems obvious that similar damage is threatened by such an operation. Frankly, I trust the Jamestown S'Klallam tribe to serve as stewards, but not a corporation with a profit motive.

Clearly many endangered species would be further endangered by this permit. It's a question of moral values - what's more important in this day and age, a business making money, or protection of a rapidly diminishing wildlife population? The answer seems pretty obvious to me, so I hope you will vote against issuing this permit.

Thank you for reading this.

Sincerely,

Katherine Jensen

On Thu, Apr 12, 2018 at 4:36 PM, Katherine Jensen <kathjensen@gmail.com> wrote:
Dear Mr. Ballard,

This email is to express a strong "NO" to the prospect of an oyster aquaculture in that area.

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Katherine Jensen

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Katherine Jensen