

**United States Department of the Interior**

FISH AND WILDLIFE SERVICE

WASHINGTON MARITIME NATIONAL WILDLIFE REFUGE COMPLEX

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

In Reply Refer To:

FWS/Rl /NWRS/FF01RWMT00

February x, 2019

Pamela Sanguinetti

P.O. Box 3755

Seattle, WA 98124-3755

Dear Ms.

Sanguinetti:

We appreciate this opportunity to provide comments on the US Army Corps of Engineers (Corps) and WA Department of Ecology (WADOE) permit application NWS-2007-1213 submitted by Jamestown S’Klallam Tribe.

We recognize Jamestown S'Klallam Tribe's efforts to reduce impacts from a proposed commercial aquaculture farm on State owned tidelands within the boundary of Dungeness National Wildlife Refuge (Refuge) through a variety of management practices (e.g., no dredging, pesticides or frosting, and providing a 25’ eelgrass buffer). Even with implementation of the best management practices, the operation of a commercial oyster farm within the area that supports the highest abundance of waterfowl and shorebirds within the Refuge (Complex, Unpublished Data 2010-2018), will cause an unacceptable level of impact. A description of the importance of this area, as well as potential impacts to wildlife and habitats was provided to Clallam County in April of 2018, and is provided as Attachment A.

The number of on-bottom bags requested in this application (80,000) is a reduction in the number requested in the previous application submitted to Clallam County in April of 2018 (SHR 2017-00011), however many of our previously stated concerns regarding the large number of bags and the 50-90 days/yr of site access remain the same. As such, we request that you consider the attached comment in your assessment of the current application. In addition, we ask that the potential for changes to the soil and benthic community caused by 14 acres of on-beach oysters of an unknown density be assessed. It also appears that eelgrass excluded from the site due to past aquaculture practices, has begun to recolonize the lease area. Locations used for on-beach and on-bottom farming activities should be located outside the potential expansion area for future growth to allow this important and limited resource to reach its full extent (Attachment B).

Additional information pertaining to access required for setup, harvest and planting (and any other activities in addition to maintenance); the timing of this access (seasonality); and the periodicity of rotational harvest would add to our understanding of potential impacts to these resources. A more detailed elevation map showing +3, -2, and +5 tidal contours based on recent survey data would increase understanding of where activities will be occurring on the lease site, and whether or not they will impact forage fish resources. Comments pertaining to frosting/graveling and pesticides can be disregarded since it appears that use of these practices are no longer proposed.

We recognize Jamestown S’Klallam Tribe’s continuing efforts to balance growth and development with the health of the environment. Since a commercial aquaculture farm of this size, in this location will impact wildlife and habitats within the Refuge, it may be mutually beneficial to identify an alternate lease area that provides an economically viable commercial aquaculture farm in a culturally acceptable location, outside of this important wildlife area. DNR tideland areas along the southern shore of Dungeness Bay and USFWS owned tidelands within Sequim Bay may be worth assessing for their ability to provide such an opportunity.

We greatly appreciate the opportunity to comment on this application and we are committed to assisting with finding the least impactful approaches to this potential use. Please feel free to contact us with any questions at [jennifer brownscott@fws.gov](mailto:jenniferbrownscott@fws.gov) or (360) 457-8451.

Jennifer Brown-Scott

Project Leader

**Attachments:**

A: USFWS Comments Re: SHR 2017-00011

B: Eelgrass Growth Map

Cc: Jamestown S' Klallam Tribe