



BrownScott, Jennifer <jennifer\_brownscoth@fws.gov>

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## Fwd: ACOE / Jamestown S'Klallam Letter - Oyster farming Dungeness NWR

6 messages

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**Stenvall, Charlie** <charlie\_stenvall@fws.gov>  
To: Jennifer BrownScott <jennifer\_brownscoth@fws.gov>

Thu, May 16, 2019 at 1:15 PM

----- Forwarded message -----

From: **Stenvall, Charlie** <charlie\_stenvall@fws.gov>  
Date: Thu, May 16, 2019 at 1:15 PM  
Subject: ACOE / Jamestown S'Klallam Letter - Oyster farming Dungeness NWR  
To: Kevin Foerster <kevin\_foerster@fws.gov>, Mary Abrams <mary\_abrams@fws.gov>

Mary and Kevin

Here's the redo of the comment letter to ACOE. I believe this letter is clear in that we are not providing comments with a regulatory attitude but as input for consideration to the Corps regulatory process. The "unacceptable level of impact" statement which created such consternation is no longer used. We also used the opportunity to provide a synopsis of the literature and associated citations that back up our concerns as there was some question about the validity of previous comments in that regard. Please let me know if Jennifer has permission to forward the revised comments.

Charlie



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**BrownScott, Jennifer** <jennifer\_brownscoth@fws.gov>  
To: "Stenvall, Charlie" <charlie\_stenvall@fws.gov>

Thu, May 16, 2019 at 1:35 PM

Just in case Mary or Robyn bring it up - we do not think that the state would take issue with using the South Bay Parcels (i.e., Cline Tracts) because the operator would be required to follow NMFS regulations regarding forage fish no matter which site is chosen. Both the current and alternate sites have forage fish resources, but the South Bay Parcels would protect the migratory bird resource which should be looked on beneficially by the state. I know we don't mention the South Bay Parcels specifically in this letter, but they were mentioned in the previous comment that is now updated and Robyn seemed concerned that the State would be upset if we offered them for use (because of forage fish resources).

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Jennifer Brown-Scott  
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~~Dungeness NWR~Protection Island NWR~San Juan Islands NWR~~  
~~Copalis NWR~Flattery Rocks NWR~Quillayute Needles NWR~~

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**Stenvall, Charlie** <charlie\_stenvall@fws.gov>

Fri, May 17, 2019 at 8:31 AM

To: Jennifer BrownScott <jennifer\_brownscoott@fws.gov>, Sue Thomas <sue\_thomas@fws.gov>

Mary Abrams comments .... they're good and if we can address most of them, we have an even better letter. Good work both of you!

C

----- Forwarded message -----

From: **Abrams, Mary** <mary\_abrams@fws.gov>

Date: Fri, May 17, 2019 at 8:22 AM

Subject: Re: ACOE / Jamestown S'Klallam Letter - Oyster farming Dungeness NWR

To: Stenvall, Charlie <charlie\_stenvall@fws.gov>

Cc: Kevin Foerster <kevin\_foerster@fws.gov>

Here are my comments - mostly they are around the continuing need for citing evidence to support claims (even when they are obviously true statements from our perspective).

M

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Mary M. Abrams, Ph.D.  
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[Portland, OR 97232](#)

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*"A leader is best when people barely know he exists. When his work is done, his aim fulfilled, they will say: we did it ourselves." Lao Zi*



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**BrownScott, Jennifer** <jennifer\_brownscoott@fws.gov>

Fri, May 17, 2019 at 8:57 AM

To: "Stenvall, Charlie" <charlie\_stenvall@fws.gov>

We are on it. We'll let you know what we come up with.

And, thanks for your excellent suggestions the other day.

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**BrownScott, Jennifer** <jennifer\_brownscoth@fws.gov>  
To: "Stenvall, Charlie" <charlie\_stenvall@fws.gov>

Fri, May 17, 2019 at 5:25 PM

Here's the rewrite with track changes, so you can see how we responded to each of Mary's comments.

In some ways the letter is definitely better. However, it also feels like we had to make some parts a bit too complex, in order to provide a citation for a really obvious statement (simply because we can't find research of the obvious - e.g., 80,000 bags full of oysters are going to negatively impact eelgrass in the area where they are installed)). Wish there was more research specific to on-bottom bags, but it just doesn't seem to exist yet.

Let us know what you think.

-jennifer

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

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**Stenvall, Charlie** <charlie\_stenvall@fws.gov>  
To: Jennifer BrownScott <jennifer\_brownscoth@fws.gov>

Mon, May 20, 2019 at 12:56 PM

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From: **Stenvall, Charlie** <charlie\_stenvall@fws.gov>  
Date: Mon, May 20, 2019 at 10:59 AM  
Subject: Fwd: ACOE / Jamestown S'Klallam Letter - Oyster farming Dungeness NWR  
To: Kevin Foerster <kevin\_foerster@fws.gov>, Mary Abrams <mary\_abrams@fws.gov>

This is ready to go out. I'll give Jennifer the go ahead to sign and send.

Charlie

----- Forwarded message -----

From: **Morris, Kendal** <kendal\_morris@fws.gov>  
Date: Mon, May 20, 2019 at 10:32 AM  
Subject: Re: ACOE / Jamestown S'Klallam Letter - Oyster farming Dungeness NWR  
To: Stenvall, Charlie <charlie\_stenvall@fws.gov>

Had a look through. Only minor edits and corrections to lit cites. I agree that Jennifer has addressed all of Mary Abrams' excellent questions. Here is a clean "changes accepted" version.

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Ken Morris, Conservation Planner  
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