

## Excerpts from JBS Daily e-Notes

### Re: Aquaculture Conversations w/RO.

Thursday, April 04, 2019

#### **Dungeness: Aquaculture: Jamestown Tribe**

Consultation Information: Response to Letter

- Feedback from Charlie
- Send to Nicole McCarthy
- This is a permitting process that is being.
- We have been requested by the Corps and the County to provide comments
- Add dates
- Add info on timing
- specific

Tuesday, April 30, 2019

Aquaculture meeting at DNG with Kevin, Robyn, Mary Abrams, and Jeanne Spaur

Wednesday, May 1, 2019

Jamestown S'Klallam G2G

Kevin, Robyn, Mary, Jeanne, Jennifer, Hansi, Liz, Kelly, Chairman Allen, Tim Cullinan.

Wednesday, May 15, 2019

#### **Dungeness: Aquaculture**

Aquaculture Letter

Completed first draft and emailed to Charlie S.

Received edits from Charlie, reworked and sent new draft to Nicole M.

Received "out of office": Nicole is out until the 24<sup>th</sup>.

Friday, May 17, 2019

#### **Dungeness: Aquaculture**

Aquaculture Letter

Made edits in response to ARD comments and emailed to Charlie.

Monday, June 17, 2019

#### **Dungeness: Aquaculture**

Asked Charlie if we should have the Solicitor's office look at the most recent email and give us their thoughts before I respond? He said that we did not provide a legal determination to begin with, so there

is no reason to get the solicitors involved. It was simply our scientifically-based perspective on potential impacts to Refuge wildlife and habitats.

Tuesday, July 16, 2019

### **Dungeness: Aquaculture**

Aquaculture Pre-Briefing

Aquaculture Briefing

After participating in Government to Government Consultation with Jamestown S'Klallam Tribe, we have a better understanding of their proposed aquaculture operation.

Wednesday, July 24, 2019

Completed new draft of aquaculture letter and sent to Charlie. Received Mary's response at the end of the day.

Thursday, July 25, 2019

Re-worked aquaculture letter. Emailed to Charlie

Friday, July 26, 2019

### **Aquaculture**

Worked with Kevin on aquaculture letter edits. Explained that we had heard the Tribe has pulled their County permit application and received a denial w/o prejudice from Dept of Ecol regarding their application. And that I do not have any of that information in writing.

Prepped for call with Kevin and Mary

There are differences in interpretations of applicable research. We believe that the references provided are the best available science related to disturbance of the habitat and species using this area. The Tribe provided their own scientific analysis that used invalid comparisons (much larger estuaries) and mischaracterizations

We started with references used by Ecological Services in their biological opinion of aquaculture impacts and then included general human disturbance studies since there are no studies specific to the impacts of humans engaged in this specific type of aquaculture. Since ACE are experts in aquaculture and the decision makers on this permit process, they can decide if these references are appropriate and useful.

These are the closest activities that we could find to the uses the tribe is proposing.

We accidentally dropped one citation in the original document which was added to this reference list. We transposed

None of their comments made us believe that our references were invalid.

They are using the same argument that is always used when people propose potentially impactful activities on Refuge lands. They make the argument that we cannot use any science that points to potential impact unless the study was conducted in the exact location, on the exact activity. That type

of science is rarely available. We did our best to use information that we thought was most comparable to the proposed activity. If ACE does not agree, they do not need to use the information.

They mischaracterized our wildlife use data.

I&M Coordinator, Kevin Kilbride: In my opinion, the refuge staff objectively and systematically reviewed and utilized best available science and exercised sound professional judgment in the evaluation of possible effects.

Mary: Likes the letter, likes approach. Good with language in the letter. Scrub references. Focus is on references. Why did we include more references (6). Owens from 1977

Widdle down to 2 pages. Incorporate by Reference Program

Call from Kevin F.

References that may be of assistance: cut down to 2 pages. Birds of north America – remove individual bird info.

Mary:

Prefer this goes somewhere else that is less impactful.

[Thursday, August 1, 2019](#)

Mary is okay with the new letter, just awaiting signature.

[Wednesday, August 28, 2019](#)

**Charlie Notes:**

Aquaculture: Discussion re: marine debris removal plan