

From: [Michael Gerardi](#)
To: cpl@dnr.wa.gov; Robyn_Thorson@fws.gov
Subject: Dungeness National Wildlife Refuge / Dungeness Spit
Date: Friday, October 22, 2021 10:17:32 PM

Hello and thank you for your time. I am writing to express my deep concern about the changes proposed for the Dungeness National Wildlife Refuge / Spit. I was extremely disappointed to hear that oyster farming and all of the negative side effects are to be allowed at the refuge. The Refuge should be preserved in its natural state, not littered with plastic and waste. Please do not let this happen to our protected natural area, it would be an absolute shame, and a great loss.

-- Plastic bags are being completely outlawed in many other areas of modern society due to the havoc they wreak on the environment. It makes absolutely no sense to purposefully install them in nature; into an existing Refuge no less.

-- Your agency agrees that significant harm will be done to the DNWF, yet has stepped aside to allow a 50 acre concentrated animal feed lot for 20-80 thousand plastic bags of oysters to endanger the Refuge and starve the birds.

-- Citizens of the United States overwhelmingly opposed this oyster project and were ignored. The US EPS disapproved. Even before the US Army of Engineers took public comment, it agree to permit the project. The public must challenge this public slap to the face.

-- Your agency is mandated to protect our natural resources, not commercialize them for short-term corporate gain. We pay with our tax dollars to have you operate and maintain these lands for the good of wildlife protection. We demand that you withdraw the oyster project permits from DNWR.

-- Permitting agencies, including the USACE, admitted the incompatibility of shellfish farming with the purpose of the DNWR. The Public Lands' staff has not denied this incompatibility.

-- The project would result in a 50% reduction in bird primary feeding grounds.

-- Plastic oyster bags will exclude the probing shorebird flocks from feeding deeply into the substrate.

-- Plastic bags entrap fish and birds.

-- Plastic bags will fray, adding macro and micro plastic bits to the sediment throughout the Refuge.

-- The thousands of oyster bags, flush on the substrate, will shift the benthic community composition.

-- The ecological benefits provided by eelgrass to threatened fish and birds, such as nourishment and cover from predators, will be diminished.

-- The operation's release of nutrients in the water and the warming weather will increase algal

blooms that will leave a graveyard of dead oysters.

-- Pathogenic oyster Denman Island Disease, oyster drills, and invasive green crabs will increase.

-- The applicant already has permits at 4 other sites for shellfish production, and there is plenty of acreage for this project in the shellfish area at their corporate headquarters.

-- These detrimental effects to our National Refuge are NOT minimal. The proposed shellfish operation would significantly harm our National Refuge. Decision makers cannot conclude that the financial benefits to the corporation outweigh the long term and cumulative impacts to the Refuge. The damage will not be temporary. The death of birds, salmon, and other wildlife will have a permanent negative impact on the land.

Please rescind the leases.

Thank you again for your time.

Respectfully,

Michael Gerardi of Sequim, WA