

From: [Alfredo Quarto](#)
To: cpl@dnr.wa.gov; Robyn_Thorson@fws.gov
Subject: Please Rescind the Leases at Dungeness Refuge
Date: Tuesday, November 2, 2021 9:50:55 PM

Dear Ms. Franz and Ms. Thorson,

It is in your power to make the decision to rescind the leases that allow development of a portion of our Dungeness Refuge to become an industrial oyster farm. Please do not allow this development to proceed. Please withdraw this lease agreement on the following grounds:

- Your agency agrees that significant harm will be done to the Dungeness National Wildlife Refuge (DNWR), yet has stepped aside to allow a 50-acre concentrated animal feed lot of 20,000 – 80,000 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 EPA disapproved. Even before the US Army Corps of Engineers (USACE) took public comment, it agreed to permit the project. The public must challenge this public slap-in-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 the 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.
- 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 Refute 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, and that the damage will be temporary. Death of birds, salmon and other wildlife is permanent, not temporary.

In Hope That You Will Rescind the Leases,

**Alfredo Quarto
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