

**From:** [BrownScott, Jennifer](#)  
**To:** [Thomas, Sue](#)  
**Subject:** Work windows and e-copy of questions  
**Date:** Monday, April 4, 2016 12:59:05 PM  
**Attachments:** [Specific Information Needed to Assess Effects to Refuge Purpose.docx](#)  
**Importance:** High

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Ralph,

What a great meeting! I thought you might want an electronic copy of the additional information that we requested, so it is attached below.

I also wanted to get back with you on your request for work windows. At this point, we are not providing a work window since we have not received a detailed proposal and would need to look at the activities and how they may impact wildlife resources. The following information on high-use seasons for shorebirds and over-wintering birds, as well as information on eelgrass will be used to evaluate impacts of your proposal and, eventually, help set work windows.

We would be concerned about disturbance to migrating shorebirds mid-April through mid-May (spring migration) and August - October (fall migration). Disturbance to over-wintering birds would be a concern November - the end of March. Suspended solids in the water column could negatively impact eelgrass during the growing season (June - September is our best guess without having the chance to talk to experts or research).

It seems like reduction of bird disturbance was used to reach the work window that is in the current lease (May 15 - July 30) because it lines up pretty closely with the dates mentioned above. Any non-ground disturbing activities taking place in June and July will most likely have the least impacts to wildlife resources and, therefore, be easier to accommodate.

Again, we are not setting a work window prior to evaluating your proposal. We did want to provide you with the dates that correspond to increased use of the area by wildlife so you could complete your proposal using as much information as possible, and plan activities to avoid sensitive times as much as possible.

Hope you find this information helpful.

-jennifer

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**Specific Information Needed to Assess Effects to Refuge Purpose**  
**April 1, 2016**

In order to begin the Compatibility Determination process, a proposal must provide enough specificity for assessment of its potential impacts to Refuge wildlife and habitats. The current proposal (as provided in the most recent JARPA document on 3/29/2016) does not provide enough detail to assess compatibility with the purpose of Dungeness National Wildlife Refuge. The following list represents information that is necessary to begin evaluation of potential impacts to habitats and wildlife. As we assess the proposal, additional clarification may be needed

**Oyster Cultivation**

For each of the Proposed Cultivation Methods (Spat – Natural production, Seed Oyster Planting, On-bottom Bags, Rack and Bag, Long Line) the following information is needed. Please provide the information separately for each method (e.g., Spat: x acres, x species, etc.; Rack and Bag: x acres, x species, etc).

- # acres
- Species
- Location within lease area
- Size of net and mesh
- Density of nets, lines, cages, bags, etc.
- Is access by land required for setup, maintenance, or harvest?
- Where are totes being stored?
- How are the oysters and nets secured/staked – density, height of stakes, nets and lines above ground. At what tidal elevations are they out of the water.
- A better description of all of the equipment necessary for each method (i.e., describe what I am seeing in the pictures)

	Dates (approx. range mo/yr)	Duration of site visit (#hrs/day/# days)	# People on site/day	Tidal Range for site visit	Chemical treatments of shellfish or habitat? Substance, dose, frequency, etc.)
Set up					
Maintenance					
Harvest					

**Geoduck Cultivation**

- Location within the lease area
- Results of previous testing
- Acreage and location of previous testing
- How are the nets secured
- What is the mesh size of the nets
- What is the process for net removal
- How are the geoduck harvested
- It is stated that there is periodic sampling. When, how?

**General**

- What is the definition of sensitive area as labeled on the site map?
- How will marine debris be monitored and removed?