



## United States Department of the Interior

FISH AND WILDLIFE SERVICE  
WASHINGTON MARITIME NATIONAL WILDLIFE REFUGE COMPLEX  
715 Holgerson Road  
Sequim, WA 98382  
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San Juan Islands NWR - Flattery Rocks NWR - Copalis NWR - Quillayute Needles  
NWR Dungeness NWR - Protection Island NWR

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In Reply Refer To:  
FWS/R1/NWRS/FF01RWMT00

March 5, 2019

Greg Ballard  
223 East 4<sup>th</sup> Street, Suite 5  
Port Angeles, Washington 98362

Dear Mr. Ballard:

We appreciate this opportunity to provide comments on the Jamestown S'Klallam Tribe's updated application for Shoreline Conditional Use and Substantial Use Development Permits SHR 2017-00011, as part of SEPA process SEP 2017-00027

We recognize Jamestown S'Klallam Tribe's efforts to reduce impacts from a proposed commercial aquaculture farm on State owned tidelands within the boundary of Dungeness National Wildlife Refuge (Refuge) through a variety of management practices (e.g., no dredging, pesticides or frosting, and providing a 25' eelgrass buffer). Even with implementation of the best management practices, the operation of a commercial oyster farm within the area that supports the highest abundance of waterfowl and shorebirds within the Refuge (Complex, Unpublished Data 2010-2018), will cause an unacceptable level of impact. A description of the importance of this area, as well as potential impacts to wildlife and habitats was provided to Clallam County in April of 2018.

The number of on-bottom bags requested in this application (80,000) is a reduction in the number requested in the previous application submitted to Clallam County. However many of our previously stated concerns regarding the location of the operation; the large number of bags; the number of people and amount of access necessary for setup, planting, transplanting, maintenance and harvest activities; and anticipated disturbance of refuge wildlife and habitat remain the same. As such, we request that you consider our previously stated concerns (letter submitted April 4, 2018) in your assessment of the current application in addition to the amendments described below.

Attachment C of our previously submitted letter provided recommended Refuge specific conservation measures to reduce impacts to wildlife, habitats, and the public. After further assessment of impacts from human disturbance to migrating and wintering waterfowl and shorebirds, we have further refined the dates provided in Recommendation #3. In

accordance with Exhibit B of the lease agreement signed in 2007 (20-AI3012), which is currently in holdover status and outlines shellfish activities that are primarily experimental in nature, the recommendation should read: "Human activity in the area should be limited to May 15 – July 30, when cultivation activities are least disruptive to waterfowl and shorebirds." Please disregard the access periods provided in the original recommendation.

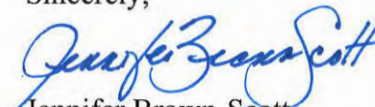
In addition to unacceptable levels of human disturbance, Refuge wildlife (e.g. brant), would also be negatively impacted by limiting eelgrass regrowth within the site. Eelgrass excluded from the site due to past aquaculture practices, has started to recolonize the lease area. Even though activities will occur outside of the larger patches of eelgrass, additional plants have been identified within the area of farming activity. On-bottom and on-beach oysters will eliminate these individual plants and prevent the thickening and expansion of eelgrass further into the lease site (Attachment A). On-bottom and on-beach oysters could also change substrate composition and the associated benthic communities (e.g., reduction in diversity). Cascading impacts from these habitat changes would negatively impact forage fish, Threatened salmonids, seabirds and other Federal Trust species.

Comments pertaining to frosting/graveling and pesticides can be disregarded since it appears that use of these practices is not proposed.

We recognize Jamestown S'Klallam Tribe's continuing efforts to balance growth and development with the health of the environment. Since a commercial aquaculture farm of this size, in this location will impact wildlife and habitats within the Refuge, it may be mutually beneficial to identify an alternate lease area that provides an economically viable commercial aquaculture farm in a culturally acceptable location, outside of this important wildlife area. Department of Natural Resources tideland areas along the southern shore of Dungeness Bay and USFWS owned tidelands within Sequim Bay could be assessed for their ability to provide such an opportunity.

We greatly appreciate the opportunity to comment on this application and we are committed to assisting with finding the least impactful approaches to this potential use. Please feel free to contact us with any questions at [jennifer.brownsconfig@fws.gov](mailto:jennifer.brownsconfig@fws.gov) or (360) 457-8451.

Sincerely,

  
Jennifer Brown-Scott  
Project Leader

**Attachments:**

A: Eelgrass Growth Map

Cc: Jamestown S'Klallam Tribe

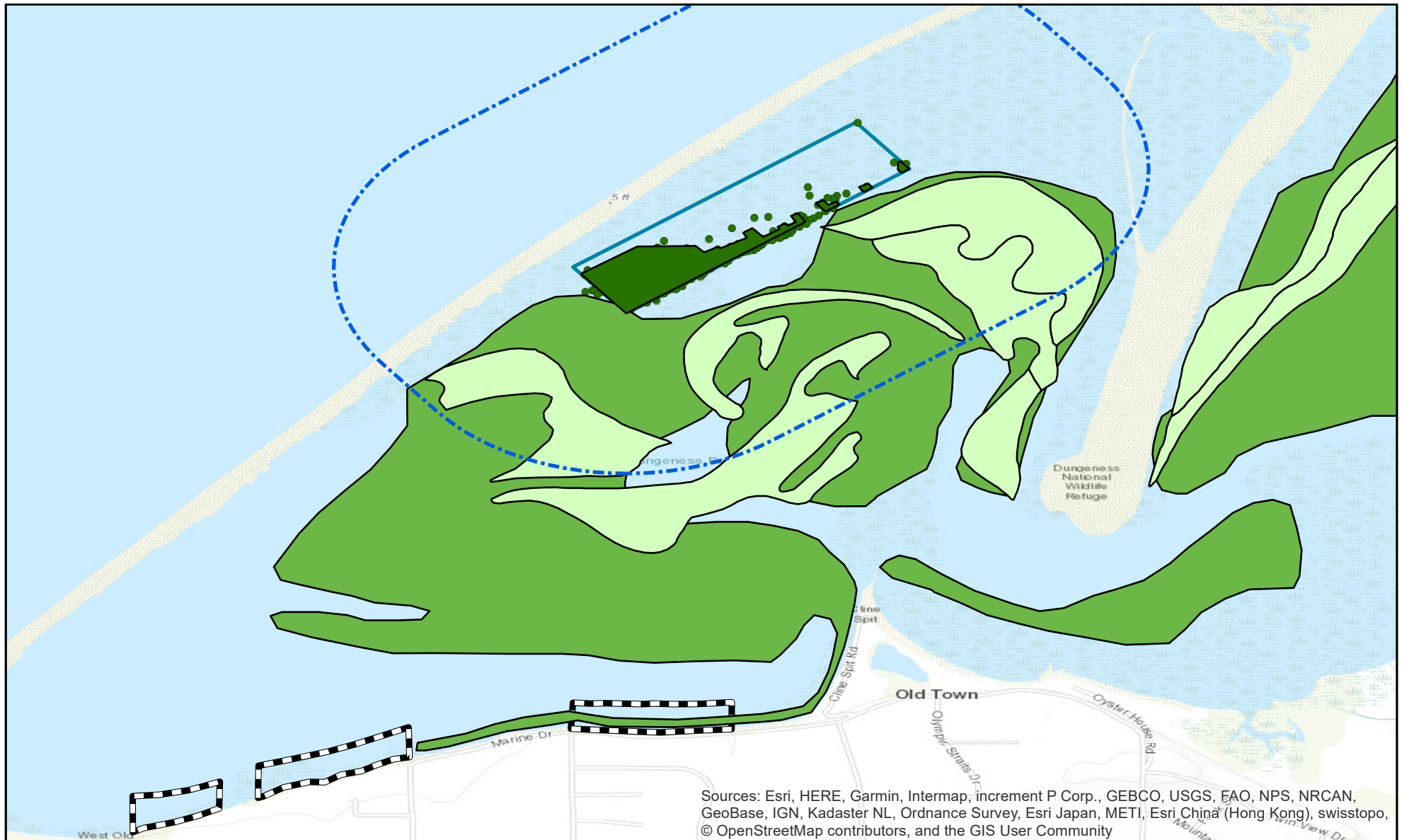


U.S. Fish & Wildlife Service

# Dungeness National Wildlife Refuge

Sequim, Washington

*Distribution of Eelgrass 1993-2016*



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, © OpenStreetMap contributors, and the GIS User Community

PRODUCED: DNWR Sequim, WA  
LAND STATUS CURRENT TO: 2/11/19  
MAP DATE: 2/11/19  
BASEMAP: ESRI World Topo Map  
FILE: 2019\_AC\_Eelgrass

## Eelgrass

2016

2009

1993

• Additional 2016 Eelgrass

Lease Area

2000 ft Action Area

Alternate Sites

0 0.25 0.5 1 Miles

