

**From:** [Ronportergood](#)  
**To:** [Robyn\\_Thorson@fws.gov](mailto:Robyn_Thorson@fws.gov)  
**Subject:** Rescind leases for Oyster beds in Dungeness National Wildlife Refuge  
**Date:** Tuesday, November 2, 2021 1:53:29 PM

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Ms. Robyn Thorson  
US Fish & Wildlife Service

RE: Rescind Dungeness National Wildlife Refuge Oyster Bed Leases

Hello Ms. Thorson,

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.

The oyster project permits from the DNWR should be withdrawn.

Permitting agencies have already admitted the incompatibility of shellfish farming with the purpose of the DNWR. The Public Lands' staff has not denied this incompatibility.

This project will result in many adverse environmental impacts:

- 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, and that the damage will be temporary. Death of birds, salmon and other wildlife is permanent, not temporary.

I look forward to hearing from you.

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