

From: [McReynolds, Ryan](#)
To: [BrownScott, Jennifer](#); [Laura Hoberecht](#)
Cc: [McReynolds, Ryan](#); [Jensen, Martha L](#); [Lund, Perry \(ECY\)](#)
Subject: Re: Jamestown Aquaculture Proposal at DNWR
Date: Friday, March 11, 2016 11:35:50 AM
Importance: High

Hi Jennifer,

I just took a call from Laura H. (NMFS) regarding the Shellfish Interagency Permit (SIP) Team Mtg scheduled for next Weds. 3/16.

Laura and Perry L. (Ecology) are trying to be responsive to the Jamestown S’Klallam Tribe's request for assistance. They and the Governor's Regulatory Assistance Office would like to introduce the Tribe's proposal next week, and gauge the SIP team's interest in hearing and engaging on the specifics of this proposal.

I have indicated that I can attend, and I am willing to participate in what should be a brief, first introduction to the Tribe's proposal. I expect that the Corps will be present and represented. All parties should be focused on constructive engagement directed at supporting the required permit approval procedures.

I understand the reluctance you expressed yesterday about meeting too soon regarding this proposal. I do agree with Laura though, an initial discussion before the SIP Team could be very helpful.

Your thoughts?

- Ryan -

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On Fri, Mar 11, 2016 at 10:28 AM, McReynolds, Ryan <ryan_mcreynolds@fws.gov> wrote:

Hi Jennifer,

I'm glad you contacted me yesterday.

I have heard previously about pending proposals for shellfish farming inside the Dungeness Spit, but haven't had much opportunity to engage or talk with others about the issues proximity to a Refuge may raise.

I have looked at the (draft?) JARPA materials provided to you by the Jamestown S’Klallam Tribe, and the photo "descriptions". All of it is really helpful.

However, I see no figures that meaningfully describe and identify where within the DNR lease boundaries the Tribe/Applicant intends to resume ground culture, bag culture, and suspended culture. Maybe the Tribe/Applicant has provided more detailed figures to the Corps more recently?

I see nothing in the (draft?) JARPA that strikes me as unusual or atypical of intertidal aquaculture operations/methods in this region.

However, the description of ground culture clearly indicates a significant role and presence of cover netting and anti-predator netting. The description of ground culture also mentions what I interpret as the use of drift fences or oyster corrals.

For the Refuge, a proposal to resume active farming inside the Spit probably raises some predictable questions: What kind of interactions can we expect between shorebirds/marine waterfowl and the cultured shellfish? What kind of interactions can we expect with the aquaculture gear which would be placed on or suspended over the tidelands? Would resuming on-site farming activities represent an increase to sound and visual disturbance that might actually have implications for shorebirds or marine waterfowl?

These are complicated questions, with a whole bunch of things to consider. For instance, the literature I've become familiar with suggests that responses vary by taxa, by feeding ecology and habit. The setting, and issues of scale, matter too.

I've attached some suggested reading.

I am interested and motivated to continue discussing these proposals with the Refuge, with the Tribe/Applicant, Corps, and DNR.

I believe there can be constructive dialogue on farming methods and best management practices.

I have cc'd my Supervisor, Martha Jensen; she too is well-familiar with aquaculture methods, and a shorebird enthusiast :)

Let's talk again soon,

- Ryan -

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On Thu, Mar 10, 2016 at 11:09 AM, BrownScott, Jennifer <jennifer_brownscore@fws.gov> wrote:

Ryan,

I greatly appreciate our conversation about aquaculture practices and the Shellfish Interagency Permitting Team. The Tribe's proposed activities are on page 5 and 6 of the attached JARPA. I have also attached some photo's of their proposed operations.

Any initial thoughts you could provide on methods as they relate to potential environmental and wildlife impacts would be greatly appreciated.

Thank you for your thoughts,
Jennifer

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