

**From:** [BrownScott, Jennifer](#)  
**To:** [PermitsR1MB, FW1](#)  
**Subject:** Incidental Take Permit for Aquaculture?  
**Date:** Thursday, August 20, 2020 8:57:38 AM

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A 34 acre aquaculture operation is in the permit process for Dungeness Bay within the highest used area of Dungeness NWR for migrating shorebirds and wintering waterfowl. The operation proposes to use 20,000 PVC oyster bags on 5 acres. Loose oyster bags, cables, etc will likely wash up on adjacent refuge shorelines where they will not be retrieved until after the migration and wintering periods. There is potential for entanglement or other migratory bird impacts from the gear.

I am discussing the compatibility determination process with the applicant on Friday and would like to let them know if there are any other USFWS permits that are needed. Would this type of project require an incidental take permit? If so, what is the process?

Thanks for your assistance.

-jennifer

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