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Subject: Operational Plan
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Attachments: [JST OPERATIONAL PLAN.PDF](#)

Attached is the one-page operational plan submitted to the County. There is no date of submission, so I am not sure what acreage or number of bags it is related to.

You will notice that the last sentence refers to bags being retrieved at high tide by mechanized lift. None of their monitoring efforts are planned to assess disturbance during this activity. They will also be unable to detect impacts of gear (e.g., avoidance) during non-low tides.

It is unclear if these visits are overlapping or separate, but could involve 5 - 18 visits per month, for the duration of low tide, with 7-27 people/visit.

-jennifer

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Dungeness Bay Oyster Farm General Operation Plan

	Timing	Site Visit Duration (hrs.)	# Visits per month	# people on site per day	Tidal Range for visit (MLLW)	Activity
*Gear placement /removal	Late Apr. – May & Mid Oct. – Mid Nov.	4 - 6	5 - 6	7 - 15	+1 to -2.5	Set up &/or removal of on-bottom bags
Bag Maintenance	Year Round	4 - 6	2 - 6	~3 - 6	+1 to -2.5	Manually flip bags, remove biofouling
Harvest	Year Round	4 - 6	2 - 6	~4 - 6	+1 to -2.5	Manually harvest beach oysters or oyster bags

The USFWS recommended annual time period where shellfish farm activities would be least sensitive to Refuge wildlife and habit: March 15 – April 15, June, July and October 15 – November 15 (See USFWS April 4, 2018 comment letter). All higher intensity farm activities, such as gear placement and removal, will generally align with these time periods. Year-round shellfish farm activities, which include on-bottom bag maintenance and oyster harvest, involves few workers (~ 3-6 individuals) and infrequent site access. It is anticipated that farm maintenance and harvest activities will require no more than 4-6 site visits per month (an average of 1 site visit per week) during low tides. During spring/summer months (March – September) workable low tides will occur primarily during daylight hours and in fall/winter months (October – February) workable low tides will occur almost exclusively at night. Oyster bags stacked for harvest are retrieved from the site during high tide using a mechanized lift; there is no corresponding onsite activity.