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| DOI Logo | United States Department of the Interior  FISH AND WILDLIFE SERVICE  911 NE 11th Avenue  Portland, Oregon 97232-4181 | | FWS Logo |
| In Reply Refer to:  FWS/R1/ | |  |  |

Colonel Mark A. Geraldi

District Engineer

U.S. Army Corps of Engineers

P.O. Box 3755

Seattle, WA 98124-3755

Attn: Ms. Pamela Sanguinetti

Dear Colonel Geraldi:

By this letter, we are rescinding the U.S. Fish and Wildlife Service comment letters dated February 27, 2019, and May 22, 2019, regarding the Jamestown S’Klallam Tribe’s application for a commercial oyster operation within Dungeness National Wildlife Refuge (Refuge). After participating in Government-to-Government Consultation with the Jamestown S’Klallam Tribe, we have a better understanding of their proposed aquaculture operation. We respectfully request that the previous two letters (referenced above) be removed from the record and that this letter replace them as the official comments from the U.S. Fish and Wildlife Service.

We recognize there is little site-specific research available on impacts of commercial, on-bottom bag aquaculture to bird species found on the Refuge and note that different parties can derive divergent conclusions from the same studies. Nevertheless, we are concerned about potential impacts to Refuge wildlife and habitat based on the proposed location for this activity. We recommend operations and monitoring activities occur outside of the migration and wintering periods for shorebirds and waterfowl, should a permit be provided. The attached reference list may be of assistance in understanding Refuge habitat, management and wildlife use and assessing potential impacts from human disturbance and in-water structure.

We are committed to assisting with finding the least resource disturbing approaches to this potential use. Thank you for accepting these comments in lieu of the aforementioned letters. If you have any questions regarding these comments, please contact Jennifer Brown-Scott at (360) 457-845.

Sincerely,

Robyn Thorson

Regional Director

Attachment: Reference List

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U.S. Fish and Wildlife Service. 2013. Dungeness National Wildlife Refuge Comprehensive Conservation Plan.

U.S. Fish and Wildlife Service. 2016. Biological Opinion - Programmatic Consultation for Shellfish Activities in Washington State Inland Marine Waters - Clallam, Grays Harbor, Island, Jefferson, King, Kitsap, Mason, Pacific, Pierce, San Juan, Skagit, Snohomish, Thurston, and Whatcom Counties, Washington (Ref. No. OlEWFW00-2016-F-0121).  Prepared by the Western Washington Fish and Wildlife Office, Lacey, Washington. August 2016.Wilson, U. W. and J. B. Atkinson. 1995. Black brant winter and spring-staging use at two Washington coastal areas in relation to eelgrass abundance.  Condor 97: 91-98.

\* Unpublished refuge-specific wildlife data is available upon request