The U.S. Shorebird Conservation Partnership

Building Collaborative Action for Shorebird Conservation

U.S. Army Corps of Engineers Regulatory Branch ATT: Ms. Pamela Sanguinetti PO Box 3755 Seattle, WA 98124-3755

1 March 2019

100

Dear Ms. Sanguinetti:

We recently learned that the U.S. Army Corps of Engineers (USACE) is considering issuing a oyster aquaculture permit in the Dungeness National Wildlife Refuge. The permit will be issued to the Jamestown S'Klallam Tribe for commercial production of oysters. We are concerned because the permit area is the most important section of the National Wildlife Refuge for migratory shorebirds and other wildlife. Single-day counts in this area have exceeded 4,000 individuals, and the total migratory shorebird population using this area may exceed 20,000 shorebirds. This level of use would qualify the area as a site of Regional Importance in the Western Hemisphere Shorebird Reserve Network. We understand that alternative sites for oyster aquaculture exist in Dungeness Bay that would have a smaller impact on shorebirds and other wildlife.

The U. S. Shorebird Conservation Partnership (USSCP) and its Council is a collective of individuals and organizations who are expert in the long-term conservation of the Western Hemisphere's shorebirds. USSCP representatives have extensive experience in shorebird conservation and include federal agencies, state agencies and non-governmental organizations. We work collaboratively to address shorebird conservation issues and propose solutions. Accordingly, we are interested in the fate of Dungeness National Wildlife Refuge because of the important stopover habitat it provides shorebirds during their spring migration, and we ask that USACE consider alternative sites to accommodate the permit request for commerical aquaculture.

Sincerely,

Catherine Hickey

Catherine Hickey, Vice Chair

U.S. Shorebird Conservation Partnership