



JAMESTOWN S'KLALLAM TRIBE

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February 24, 2022

Greg Ballard
Sensor Planner
Clallam County Department of Community Development
223 E 4th St. #5
Port Angeles, WA 98362

RE: WEST Inc. Review and Addendum to Dungeness Bay Oyster Farm Avian Monitoring Plan

Dear Mr. Ballard,

On January 7, 2022, environmental and statistical consultants, WEST Inc., submitted a review of the *Avian Monitoring Plan for the Jamestown's Dungeness Bay Oyster Farm* prepared for and approved by the U.S. Army Corps of Engineers as part of the Terms and Conditions of the Individual Standard Permit issued to the Tribe on July 27, 2021. WEST Inc. staff provided 3rd party expert review of the Monitoring Plan, as well as comments provided by USFWS and Olympic Audubon Society per request by the County, as stipulated in the Hearing Examiner's February 2020 Decision. The overall comments submitted by WEST Inc. were generally positive, recognizing that the Monitoring Plan provides an "adequate approach" to meeting the stated goals and objectives, and "reasonable study design" for answering the questions specific to bird use within the lease area and bird-farm work interactions. WEST Inc. also provided several specific constructive recommendations intended to "increase the likelihood of accomplishing the stated objectives." The Tribe has carefully considered each of WEST Inc.'s specific comments and has incorporated the majority of their recommendations in the enclosed addendum to the Avian Monitoring Plan.

Not identified in the WEST Inc. review but communicated to the Tribe by Clallam County DCD staff was the recommendation to acquire and consider baseline data. The Tribe has already acquired existing baseline observations, spanning 2010 – 2018, that encompasses the farm lease area during the fallow period (i.e., no farm activity) from surveys conducted by USFWS and Olympic Audubon Society. The Tribe has compiled this observational data to understand spatial distributions and habitat use by target species groups in a prepared June 24, 2019 technical memorandum. If any additional baseline or companion monitoring occurs from these programs, the Tribe would welcome these datasets and will commit resources to incorporate

those observation into the analysis. Photo records to supplement on-site observations will also be taken per Section 4(b)(iii) of the Plan.

Please let us know if you have any questions regarding the addendum to the Avian Monitoring Plan.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Tobin".

Elizabeth Tobin
Shellfish Program Manager/Project Agent
Jamestown S'Klallam Tribe