

# REDWOOD REGION AUDUBON SOCIETY

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September 14, 2016



Jack Crider, Director  
Humboldt Bay Harbor, Conservation & Recreation District  
601 Startare Drive  
Eureka, CA 95501

Redwood Region Audubon Society Comments on Coast Seafoods (Coast) R-DEIR

Dear Mr Crider:

Redwood Region Audubon Society (RRAS) has reviewed the Coast Seafoods Company Humboldt Bay Shellfish Aquaculture Permit Renewal and Expansion Project, SCH #2015082051. We are opposed to the proposed expansion of Shellfish culture in Humboldt Bay. Our comments are as follows:

1. The first bullet item of project states one objective is *“To expand Coast’s shellfish farm to increase future oyster production, meet Coast and Pacific Seafood’s increasing customer demand for raw and shucked oysters, and regain access to markets and customers lost after production decreases associated with the 2006 transition to sustainable, off-bottom culture practices on a reduced footprint.”* According to 5.2.1, the Eelgrass Avoidance Alternative was screened out because it would fail to meet the project objectives. Neither the project objectives nor production under the Eelgrass Avoidance Alternatives are quantified in the R-DEIR. Therefore, rejection of this alternative as “infeasible” is not valid.
2. The East Bay Avoidance Alternative was screened out based on Phase II mitigation of impacts. We believe the Phase II impact evaluations are flawed and the proposed mitigation, consisting monitoring is not appropriate. (Black & Ward comments, Sept. 8, 2016)
3. Conservation BIO-12 states: *Coast will not intentionally approach or harass migratory birds that are actively feeding or resting within the project area.* This fails to take into account the temporal aspects of migratory birds that are prevented from feeding or resting when cultural activities are taking place in the project area. This item needs to be addressed in more detail.
4. Section 4.5.3, first sentence of last paragraph states: *The Project will also contribute significantly to the local economy. Coast’s lessors, including the Harbor District and City of Eureka, will benefit from increased lease payments tied to production.* Because the District is the lessor and potential beneficiary of Coasts expansion of operations, it must distance itself from influencing the outcome of the approval process.
5. Section III, 3.3.3 of the Humboldt Bay Management Plan (HMP) executive Summary States: *“An ecosystem-based management approach requires a balancing of priorities and policies outlined in this Humboldt Bay Management Plan. It should be noted that the 104 policies specified in the Plan have not been prioritized. Instead, no one policy is considered to be more important than another policy, rather they are equals.”* The R-DEIR does not appear to give equal weight to each of the Harbor, Recreation, and Conservation aspects. It

is important that this project be considered in light of all 104 priorities and policies, according to Section III, 3.3.3.

6. HMP Section III, 3.3.3 also indicates an ecosystem based management plan. The R-DEIR should address this more wholistic ecosystem approach.

In considering the aforementioned items and many other details that time does not allow us to enumerate, it is the opinion of Redwood Region Audubon Society that a modified version of the phase I expansion, such as Audubon California's marine spatial planning approach, is more appropriate than the version proposed in the DEIR. Eelgrass avoidance, leaving the east portion of Arcata Bay free of cultural activities, and concentrating cultural activities to areas already impacted in the west portion of the bay meet the objectives of bird conservation, eelgrass protection and recreational access while providing reasonable expansion of shellfish culture.

We also believe that phase II should be abandoned since findings of no significant impact are speculative, poorly evaluated, and unmitigated. Monitoring does not qualify as mitigation. If and when the equivalent of a phase II expansion is proposed, it should be as a separate project and based on the results of studies of the phase I project.

Audubon would support efforts at off-bottom culture where all shellfish harvest would be done from boats so there would be no "boots on the ground" damaging the eelgrass in the culture areas and establishment of an Eelgrass Preserve in the eastern portion of the Arcata Bay.



Sincerely,

Jim Clark, Conservation Committee Co-Chair  
Redwood Region Audubon Society