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Redwood Region Audubon Society (RRAS) position on aquaculture expansion in North Humboldt (Arcata) Bay in general and Coast Seafoods (Coast) proposed expansion in particular.

Mariculture expansion in general is not opposed by the committee. Aquaculture has economic and environmental benefits. We also recognize that there is a limit to the extent of mariculture in Arcata Bay where negative environmental impacts will be unacceptable regardless of the possible short-term economic benefits. The committee advocates incremental expansion with small in situ proof of concept testing before moderate permanent expansion. Such expansion ideally would provide all growers an equal opportunity to expand their operations under permit.

More Specifically

1. The proposed Coast Seafoods expansion is too large: The proposed phase I expansion of 256 acres presents an unrealistic size, in our opinion, for effective monitoring and adaptive management. Size, extent of structures in the aquaculture areas, including removal in the course of adaptive management could in themselves have a significant negative environmental impact. Evidence exists showing that Coast Seafoods has failed to remove debris from a much smaller abandoned aquaculture in violation of California Department of Fish and Wildlife regulations. Coast has recently been cited by the Coastal Commission for failure to remove debris.
  - a. Reduce Phase I to no more than fifty acres in total.
  - b. Aquaculture carrying capacity should take into account all areas available for use by current and future aquaculture operators.
  - c. All abandoned structure related to aquaculture and adaptive management thereof should be removed according to California Department of Fish and Wildlife regulations as a condition of permanent expansion.
2. The environmental review documentation for the current proposed expansion, while extensive, contained many references that were not fully contextual or incomplete. This resulted in difficulty in review by anyone not participating in writing the draft and final EIRs.
  - a. Research on the viability of expansion and its environmental effects should be presented in the form of a publicly available, peer reviewed document.
  - b. The peer reviewed document should be the basis for an EIR for permanent expansion, if appropriate.
3. The expansion of mariculture in Arcata Bay is a long term project on the order of multiple decades. Over this time period global climate change is accelerating at a rate that has not occurred in the holocene period. As a consequence, sea level rise and acidification is occurring at similar rates. This combined with regional seismic activity leads to a high degree of unpredictability for conditions in Humboldt Bay.
  - a. Proposals for aquaculture expansion should take into account how climate, sea level and seismic changes will be accommodated to minimize environmental impact.
4. The context of the EIR implies that monitoring and adaptive management of Phase I will compensate for negative environmental impacts. Compensation for negative environmental impacts is called "mitigation". Monitoring and adaptive management is not mitigation and cannot be legally be used in lieu of mitigation.
  - a. Negative impacts determined through initial studies must be fully mitigated in any subsequent aquaculture expansion.

- b. Negative impacts resulting from the initial studies must be fully mitigated before approval of subsequent aquaculture expansion.