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April 13, 2020

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California Coastal Commission  
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San Francisco, CA 94105-2219  
*Via Electronic Delivery: Cassidy.Teufel@coastal.ca.gov*

Comments re. Draft Outline on CDP Application Guidance for Aquaculture

Dear Mr. Teufel,

The Environmental Action Committee of West Marin (EAC) is based in Point Reyes Station and has been working to protect the unique lands, waters, and biodiversity of West Marin since 1971. Since our inception, we have been committed to the health of West Marin's estuaries, bays, and watersheds including our strong focus on Tomales Bay.

We submit these brief comments regarding the draft outline on the Coastal Development Permit (CDP) application guidance for aquaculture. We begin with our general support for the effort, followed by a few suggestions and additions.

The outline seems logically ordered and appears that it will serve as a helpful tool for the aquaculture industry, regulators, and environmental advocates. As required by SB 262, it seems critical that these efforts are coordinated with other agencies such as the Department of Fish and Wildlife so that the approach to our state's aquaculture permitting is as consistent as possible. However, if one agency has more stringent requirements, that could be noted and the stricter requirements should control.

We raise the following ten suggested comments and/or additions, which are likely already being considered.

1) It would be helpful if the full draft document includes all defined acronyms and a glossary of terms.

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- 2) It is important to distinguish built-in permit flexibility from changes requiring formal permit amendments and closer agency oversight to avoid any confusion by the aquaculture operators. It also might be worth tracking immaterial amendments so that the cumulative impact of immaterial changes does not become material over time.
- 3) Examples of indicator, foundation, keystone, threatened and endangered species should be included directly or by reference in the draft document. The document should be careful to indicate that any species listed in the document will only serve as an illustration but not the full list, as each application's considerations will be site specific.
- 4) Visuals would be helpful including bar charts, tables, flow charts, etc. For example, a table could help illustrate and distinguish between material versus immaterial amendments, etc.
- 5) The regulatory compliance will be a key reference section for aquaculture operators, as well as citizen watchdog groups. Non-compliance examples may be useful so that they can be avoided in the future. Penalties and fees associated are also relevant to this discussion.
- 6) We look forward to having past commission guidance and decisions on the topics outlined in one place.
- 7) Under project description, it would be helpful to request that any conflicts be addressed in this section, such as conflicts between the proposed project and recreation, species, and/or navigation.
- 8) Project description should also address potential impacts around disease and invasive species.
- 9) A suggested addition to the draft is the reasonably foreseeable impacts associated with climate change including sea level rise and other changing aquatic conditions on coastal resources. It would be helpful to touch on this important topic in the document, as aquaculture operators will be contending with these issues. Climate change impacts will also likely impact other concerns such as species diversity and eelgrass habitat and should be considered alongside other impacts. Climate impacts could be addressed under project description and/or Coastal Act issues.
- 10) As an overall comment, while this guidance will likely be a helpful tool for state aquaculture, there is no one size fits all approach, especially with such a diverse coastline. Each geographic coastal region has unique coastal resources, impacts, and considerations that must be considered for each application or CDP amendment individually.

We thank you for your consideration of our comments and your inclusion of stakeholder input early during this process.

Respectfully,



Morgan Patton  
Executive Director



Ashley Eagle-Gibbs  
Conservation Director