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December 19, 2022

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Fish and Game Commission Marine Resources Committee
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Re. Aquaculture leasing in California – public interest determination

Dear Mr. Lovell, Department staff, and Commissioners,

Thank you for the thoughtful discussion at the November Marine Resources Committee (MRC) meeting regarding the aquaculture public interest criteria. With the holidays fast approaching, we wanted to send a brief letter to present some high-level follow-up comments and request a meeting in the new year. Our high-priority concerns related to the criteria include the following:

- 1) Exclusion of marine finfish from the criteria as a constraint,
- 2) Add language that any aquaculture proposal contains measures to prevent wildlife entanglements, and
- 3) Strengthen language regarding avoidance of eelgrass habitat (e.g., aquaculture operations shall not be sited in areas containing eelgrass).

We believe that we are close to resolving the first two points. Comments were made by Commissioners Murray and Sklar supporting the exclusion of marine

finfish from the criteria at the MRC consistent with the California Ocean Protection Council's forthcoming Aquaculture Action Plan. In addition, regarding entanglements, I understand Mr. Lovell spoke with Mr. Shester of Oceana regarding some proposed entanglement language at the November MRC meeting. We look forward to reviewing the revised language on these two points. Regarding eelgrass, we would like to discuss how we can strengthen the draft language to best protect this important habitat area from future development.

As an additional point, we also support President Murray's request at the MRC to strike the following language: "one specific Consideration cannot by itself force a specific decision...."

We are pleased that the criteria process is moving forward, and we look forward to engaging more on criteria revisions in the new year in advance of the March MRC meeting. We would be happy to help with revised language, etc. Thank you in advance for the consideration of our comments and your willingness to work on refining this language. We hope the criteria will be a first step in the process to ensure our state's aquaculture is sustainable and properly sited.

Sincerely,



Ashley Eagle-Gibbs, Esq., Legal and Policy Director
Environmental Action Committee of West Marin

cc: Susan Ashcraft, Senior Environmental Scientist and Marine Advisor, California Fish and Game Commission
Sara Briley, Environmental Scientist, California Department of Fish and Wildlife
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