

June 5, 2006

The Honorable Mike Chrisman, Chair
California Ocean Protection Council
1416 Ninth Street, Room 1311
Sacramento, CA 95814

Re: Agenda Item 11D: Funding for the coastal aquaculture PEIR – SUPPORT

Dear Secretary Chrisman and Members of the Council:

The Ocean Conservancy, Bluewater Network/Friends of the Earth, and Defenders of Wildlife are writing in support of the authorization of up to \$300,000 in funding by the Ocean Protection Council for the planning and implementation of a Programmatic Environmental Impact Report (PEIR) for marine aquaculture.

Two national ocean commissions have expressed concerns recently about the risks to the marine environment from marine finfish aquaculture.¹ These risks include the spread of disease and parasites; threats to wild fish stocks from escaped fish; the discharge of wastes, chemicals and antibiotics; conflicts with commercial and recreational fishing and other ocean uses; adverse interactions with marine mammals and wildlife; and adverse ecosystem effects from using fish products for feed.

The cultivation of salmon, transgenic and non-native finfish species was banned in California ocean waters in 2003 because of potential adverse impacts.² On May 26, 2006, the Governor took another significant step by signing into law SB 201 to provide fair and reasonable standards to manage marine aquaculture operations that farm native fish species.³ SB 201 requires that leases issued by the Fish and Game Commission ensure that operations: do not adversely affect wildlife, marine habitats, fishing and other uses; prevent the discharge of pollutants; minimize the use of drugs and chemicals; restore any damage to the marine environment; monitor and inspect facilities; minimize the use of fish meal and fish oils; pay appropriate fees to administer the leasing program; and prevent and report escape of farmed fish.

¹ *An Ocean Blueprint for the 21st Century*, Final Report of the U.S. Commission on Ocean Policy, Washington, D.C. 2004; *American's Living Ocean*, 2003 Report of the Pew Oceans Commission, pp.73-79.

² SB 245. Fish and Game Code §15007.

³ SB 201, Chapter 36, Statutes of 2006. An act to amend Sections 15400, 5405, 15406, 15406.5, and 15409 of, and to add Sections 54.5 and 15008 to, the Fish and Game Code, and to amend Section 30411 of the Public Resources Code, relating to aquaculture. SB 201 was supported by The Ocean Conservancy (sponsor), Bluewater Network, California Coastkeeper Alliance, California Coastal Protection Network, California League of Conservation Voters, CalTrout, Coastside Fishing Club, Center for Food Safety, Defenders of Wildlife, Environment California, Environmental Center of San Luis Obispo, Environmental Defense, Environmental Defense Center, Environmental Entrepreneurs, Institute of Marine Sciences – US Santa Cruz, Monterey Bay Aquarium – Center for the Future of the Oceans, Natural Resources Defense Council, Oceana, O'Neil Sea Odyssey, Orange County Coastkeeper, Pacific Coast Federation of Fishermen's Associations, Planning and Conservation League, Santa Barbara Channelkeeper, San Diego Baykeeper, San Luis Obispo Coastkeeper, Santa Monica Baykeeper, Save Our Shores, Seaflow, Sierra Club California, The Nature Conservancy, University of California Marine Council.

SB 201 also requires that a Programmatic Environmental Impact Report for ocean fish farming evaluate critical issues such as selecting appropriate sites to avoid conflicts with existing uses and sensitive habitats; the effects of leasing on fish and wildlife; the effects of wastes, chemicals and biological pollutants on the marine environment; the effects of the use of fish meal and oils on ocean ecosystems; and the appropriate design of aquaculture facilities to prevent escapes.

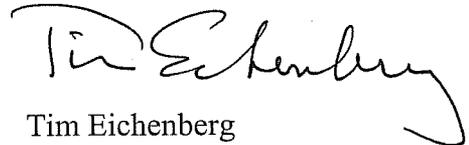
To prevent the further decline of commercial fisheries in California,⁴ we need to ensure that if fish farms are permitted, they will be done in a sustainable and precautionary manner that does not exacerbate declining ocean health. We commend the Governor and Secretary Chrisman for their foresight in enacting SB 201 before the proliferation of commercial marine fish farm operations impact California's ocean waters. Funding the PEIR is an important first step to allow California to get ahead of the curve and answer critical questions about the efficacy of marine finfish aquaculture operations before they become a problem. Individual aquaculture lease applications will also undergo environmental review under the California Environmental Quality Act, and will have to meet strict environmental standards of SB 201.

Thank you for your attention to this important issue.

Sincerely,



Teri Shore
Bluewater Network/Friends of the Earth



Tim Eichenberg
The Ocean Conservancy



Jim Curland
Defenders of Wildlife

⁴ Revenues have declined nearly 400% in the past 20 years. California's Living Marine Resources: A Status Report, California Department of Fish and Game, 2001.