

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON CURRENT HABITAT ISSUES

Members of the Coastal Pelagic Species Advisory Subpanel (CPSAS) and Coastal Pelagic Species Management Team (CPSMT) participated in a webinar on February 24, 2014 and discussed the draft Habitat Committee (HC) letter regarding the KZO Sea Farms project (Agenda Item E.1.a, Attachment 1). The CPSAS appreciates the Council's consideration of the following comments in support of HC recommendations.

By way of background, the KZO project was developed largely in the absence of consultation with commercial fishing interests in Southern California, and the proposed site is situated in the most productive fishing block for Coastal Pelagic Species (CPS) and market squid on the San Pedro shelf. Block 739 also has been shown to be the largest spawning grounds in Southern California for barred sand bass, an important recreational species.

The CPSAS concurs with the concerns raised in the HC letter, and encourages the Council to approve this letter to provide recommendations for a process to guide future aquaculture or other offshore development to avoid potential negative impacts to fisheries and/or fishery habitat.

We are not opposed to aquaculture generally, but do have grave concerns when the project is planned and submitted for approval before consulting with the fisheries stakeholders, as was the case with KZO Sea Farms. The CPSAS supports the recommendations in the HC letter to establish a policy framework for aquaculture (and other offshore development). The main points are:

1. Analysis of potential impacts of project design -- including impacts on habitat and fisheries - should occur prior to project designation. Marine Spatial Planning, including consultation with all stakeholders, should occur as the first step to identify areas suitable for aquaculture (and other offshore development).
2. Baseline information should be gathered over multiple seasons, both at the proposed site(s) and a comparable control site(s) not influenced by the project.
3. An ongoing independent monitoring program during project construction and throughout the duration of the project is mandatory, in both project area and control site.
4. A decommissioning plan should be included in any aquaculture proposal, including a bond or other mechanism for financial security in event of default or bankruptcy.

The draft HC letter provides details on baseline and ongoing monitoring data needs, that could be relevant to numbers 1, 2, and 3 above.

The CPSAS suggests one additional requirement, from a fisheries perspective:

5. An indemnity clause holding fishermen harmless from liability in the event of accidental contact with the project structure and a mitigation plan, i.e. Lost/Damaged Fishing Gear Compensation Program, should be required as a condition of plan approval.

Thank you for your consideration of these comments.

PFMC
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