

February 20, 2018

Fish and Game Commission  
1416 Ninth Street, Room 1320  
Sacramento, CA 95814

Via Electronic mail: [fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)



Re: Marine Resources Committee March 6, 2018 Meeting Agenda Item 8,  
Aquaculture Conducted on State Water Bottom Leases Issued by The Commission

Dear Commissioners:

The River Otter Ecology Project, based in Marin County, is an organization dedicated to supporting watershed conservation and restoration through research, education, and community science. As apex predators who use a variety of terrestrial and aquatic habitat types, river otters are sentinel indicators of watershed health, and understanding their ecology and status is a critical element of ecosystem management. Tomales Bay is a focal area in our long-term field study of recovering populations of river otters in the San Francisco Bay Area.

We are greatly concerned with the slow pace of your Commission's work to adopt best management practices (BMPs) for aquaculture on state water bottom leases. Over three years, only the most preliminary steps in the formal rulemaking process have been undertaken. We strongly urge you to direct Department of Fish and Wildlife staff to complete promptly the preliminary work needed for the issuance of an Initial Statement of Reasons for a regulation change so that the formal rulemaking process can begin. Considering the intensification of use of Tomales Bay's public trust resources, both for recreational and commercial use, along with the intensification of climate change, time is absolutely of the essence.

In regard to specific BMPs, we believe that buffers for avoidance of adverse impacts to wildlife and eelgrass are of prime importance. The methods by which these buffers are maintained should be both measurable and enforceable. Employees of growers should be trained in the importance of maintaining these buffers. We also note that avoidance of impacts to wildlife and eelgrass

necessarily includes an imperative for operational discipline on the part of the growers, and the elimination of single-use materials.

We appreciate your Commission's sustained attention to these important issues. At the same time, we remind you of your fundamental responsibility to protect California's public trust resources.

Thank you for the opportunity to comment.

Respectfully,

A handwritten signature in black ink that reads "Megan Isadore". The signature is written in a cursive, flowing style.

Megan Isadore, Executive Director, River Otter Ecology Project  
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