

Coast Seafoods Expansion Permit FEIR Comments

as of 11:00 AM January 19, 2017

From: Raymond Lyon [<mailto:lyonf6@sbcglobal.net>]
Sent: Saturday, January 14, 2017 7:27 AM
To: jcrider@humboldtby.org
Subject: Proposed expansion of oyster culture in Humbolt Bay

Thank you for the opportunity to comment on the proposed expansion of oyster aquaculture activities in the Humbolt Bay.

I have spent and innumerable days fishing and hunting on the North coast for salmon, steelhead and geese. I have enjoyed the unfettered nature and beauty of the area which has been maintained by those who live and are just as considerate of these rare factors in the face of our ever increasing urban and economic pressure. I am a wildlife professional, hunter and conservationist, and I was frankly taken aback by the specious statements supporting these activities which concluded that hunting has potentially a greater impact than the proposed activities. Hunting is a regulated activity which scientifically and biologically assesses populations and habitats to provide SUSTAINABLE harvest of our natural resources. Of these components HABITAT and mans destruction and manipulation resulting in limited availability is the greatest consideration. Animals must first have a home and the key components of survival which include food, water, shelter and space. The proposed activities as concluded by studies and supported by the credibility of the entire Pacific Flyway Council, will result in the degradation and harm to a severely limited availability of a highly dependent habitat and food resource. If the proposed expansion takes place it certainly will result in allowing this to occur and have negative domino effect of the entire dependent ecosystem.

As a wildlife professional, hunter and conservationist I express my personal and professional objection to this expansion and hope the governing body will give full weight to the grave and proven outcome of the detriments which have already cumulatively affected the extremely sensitive and limited eel grass habitats. The potential ramifications of continuing this destruction and degradation these activities will create is difficult to reverse as restoration has proven difficult. It is a much more prudent and responsible course of action to recognize these effects and take proactive steps to ensure their continued existence with additional consideration to their enhancement.

Thank you for your time and consideration.

Raymond Lyon
3198 Coronado Rd.
Chico, Ca. 95973
(530) 893-8345

From: Don [<mailto:donfurber@humboldt1.com>]
Sent: Friday, January 13, 2017 9:52 AM
To: jcrider@humboldtby.org
Subject: oysters or brant?

Hi; I writing to weigh in on the proposal to expand oyster farming in Humboldt Bay. My bet is this decision will come down to an argument of jobs versus the environment, in most general terms.

While I am not one of the knee-jerk pro environment at any cost type, I do feel that voting with the Black Brant's welfare in mind should take precedence because of the unique needs and somewhat precarious state of the species. Eel grass beds must be preserved. Can oysters production not interfere with this food source for the brant? Thanks for considering my opinion. Don

From: camelg@aol.com [<mailto:camelg@aol.com>]

Sent: Thursday, January 12, 2017 10:38 PM

To: jcrider@humboldtбай.org

Subject: Coast Seafoods Feir
MR CRIDER,

FROM THE BEGINNING THE LEGAL PROCESS FOR COMPLAINTS AGAINST THE EXPANSION OF THE OYSTER BEDS AREA HAS BEEN FLAWED AND BIASED. THE OVERWHELMING POLITICAL SUPPORT FOR GREG DALE'S OYSTER BUSINESS HAS BEEN DECIDED WAY IN ADVANCE BEFORE THE REQUIRED TIMELINE/RECEIPT OF NONSUPPORT SUBMISSIONS AGAINST THE PROJECT.

ITS OBVIOUS MONETARY GAIN AND PROFIT SUPERCEDE ANY "NON PROFIT" RECREATIONAL /SPORT/HUNTING ACTIVITES.

BY IMMENSELY EXPANDING THE NORTH BAY INTO ADDITIONAL HUNDREDS OF ACRES OF SHELLFISH BEDS, THIS BUSINESS GROWTH WILL BE THE DEATH BLOW FOR ANY OTHER TYPE OF USE-RECREATIONAL IN THE FUTURE.

FISHING WILL BE NEAR IMPOSSIBLE IN THE NORTH BAY, DUCK/GOOSE/BRANDT HUNTING WILL BECOME A THING OF THE PAST BECAUSE OF THE PRESENCE OF A "BUSINESS AND ITS WORKERS" FOR MOST OF THE WEEK.

THERE ARE THOUSANDS OF RESIDENTS THAT UTILIZE THE NORTH BAY TO FIND PEACE AND TRANQUILITY, PLEASURE AND EXCITEMENT OF THE CATCH OR SHOT, OR UNRESTRICTED TRAVEL MOBILITY IN THE WATERS OWNED BY ALL OF US. DENIAL OF THIS EXPANSION IS THE ONLY HONEST, TRANSPARENT, SINCERE OPTION.

PLEASE VOTE NO-TO PREVENT THIS EXPANSION.

SINCERELY, DEAN GLASER

1546 RONALD AVE.

FORTUNA, CA. 95540

7077253880

From: Dustin and Erin Kuehn [<mailto:peachykuehn@suddenlink.net>]

Sent: Tuesday, January 17, 2017 10:32 AM

To: jcrider@humboldtбай.org

Subject: Oyster Expansion Negatively affects brant population

To Whom It May Concern,

Since I cannot attend and speak at the meeting on January 19th due it being my daughter's birthday, I am sending you my speech:

“Hello. My name is Dustin Kuehn. I am a math teacher at Eureka High School where I teach introductory college statistics (AP Statistics) among other regular high school math classes. I am in my 14th year in the area, have married a local girl, started a family, and have two beautiful daughters. I have always been an avid waterfowl hunter, but it wasn't until moving to Humboldt when I discovered the Black Brant. Let me just say that I greatly look forward to teaching my daughters the ins and outs of the black brant and brant hunting; however, if this project goes through, those dreams are in great jeopardy. The black brant have quite the tremendous story as they migrate from the Arctic circle (Northern Alaska and Russia) all the way to Mexico and then back again. When I first moved here, the populations were so low that there was only a two week hunting season; however, there was a hard core fraternity of brant hunters involved with trying to recover the population to more stable numbers. Over a decade later, with the help of conservation organizations such as California Waterfowl Association, Ducks Unlimited, and biologists at HSU, the black brant population is in upwards of 150,000 brant, and the hunting season is now 5 weeks long. This has been the direct result of good habitat management in the few staging areas of black brant throughout their migration. From what it looks like, it seems that you don't know that Humboldt Bay is one of the main staging areas of black brant. Humboldt Bay's eelgrass beds host approximately 60 percent of the total brant goose population in the Pacific Flyway throughout the year. Scientific studies show over and over again that hunting has a negligible effect on brant populations and that habitat management is the #1 factor in population recovery/stabilization. Ducks Unlimited and California Waterfowl have written you letters, citing the scientific evidence and their opposition to this project. Studies also show that brant change their seasonal use patterns due to habitat disturbance. In Washington State, oyster farming activities were correlated with reductions in eelgrass abundance and in turn, significant decreases in brant use. It seems that all these scientific studies that demonstrate aquaculture negatively affects brant are falling on deaf ears. In a state where pushing some rock off Hwy 299 into the Trinity River will shut down a construction project for months and result in massive fines, how in the world is destroying habitat for a fragile black brant population going to be allowed to happen? My main point is this: ***The resulting loss and degradation of eelgrass habitat and increased disturbance will harm black brant populations - a population that conservation organizations have worked so hard over the last decade to recover! We simply cannot allow this to happen.***”

Thank you,
Dustin Kuehn

From: Stan Brandenburg [<mailto:stan.brandenburg@gmail.com>]

Sent: Friday, January 06, 2017 4:58 AM

To: Scott Frazer <genescottf@gmail.com>; Steve Rosenberg <sjreur@aol.com>; Weinstein, Anna <aweinstein@audubon.org>; Ted Romo <blackbrantsky@yahoo.com>; Roger Cox <rognwo2014@suddenlink.net>; Rich Jensen <grassboat13@yahoo.com>; George A Palmer IV <gapsiv@suddenlink.net>; johnny B <johnnbrandenburg2135@hotmail.com>; Tom Burns

<tjburns7@comcast.net>; jcrider@humboldt看bay.org

Subject: Coast Seafood FEIR

FYI, The following is the text of a message that I submitted this morning to the Harbor Commission's website which said that they received it.

"Please forward this to all commissioners, Mr. Jack Crider, and the Planner in charge of Coast Seafood FEIR

In regards to the way the issues in Coast Seafoods FEIR were addressed, HBHRC staff or consultants did not respond appropriately to the state hunting communities concerns about public hunting access, public boating safety or the viability of Pacific Black Brant habitat in Humboldt Bay. As such, the proposed mitigations in the FEIR are inadequate and do not fully address the state hunting communities concerns. Additionally, Broadcast on KIEM Television's public opinion poll dated 05 January 2017, the question was, "Do you support expanded oyster culture in Humboldt Bay?" 26% said yes and 74% said NO! It is readily apparent that the rest of the community thinks this is a bad idea too, not just hunters."

January 18 2017

Sample of 2,461 emails received

-----Original Message-----

From: cafhock@everyactioncustom.com [<mailto:cafhock@everyactioncustom.com>]

Sent: Tuesday, January 17, 2017 10:24 PM

To: clerk@humboldt看bay.org

Subject: Please protect migratory birds in Humboldt Bay

Dear President Patrick Higgins,

As someone who cares deeply about birds and habitat in California, I ask you to please reject Coast Seafood's final Environmental Impact Report and reject the company's proposed expansion of oyster farming in Humboldt Bay.

As you may know, the dense eelgrass beds and mudflats of Humboldt Bay support the highest diversity of shorebirds on the West Coast – huge numbers of Western Sandpiper, Least Sandpiper, Dunlin, Marbled Godwit, and Long-billed Curlew. And up to 60% of all Pacific Black Brant. The Coast Seafood project as described in the final Environmental Impact Report will damage eelgrass beds and drive shorebirds off the mudflats. Please help to support a balance of oyster farms and resource protection in Humboldt Bay.

Again, please reject the Environmental Impact Report and proposed expansion of oyster farming. Thank you for your consideration.

Sincerely,

Dolores Athuil

7973 Beverly Blvd Los Angeles, CA 90048-4510

From: Katy Panebianco [<mailto:katypanebianco@yahoo.com>]

Sent: Tuesday, January 17, 2017 10:37 PM

To: jcrider@humboldt看bay.org

Cc: Cassidy.teufel@coastal.ca.gov; alecia.vanatta@noaa.gov; l.k.sirkin@usace.army.mil;

Brendan.Thompson@waterboards.ca.gov; Rebecca.garwood@wildlife.ca.gov

Subject: Please Move Against Coast Seafood

Good evening,

I am a concerned citizen who is against the motion to increase the amount of usable land for aquaculture from 300 to 500 acres. Such a drastic increase in area would not be sustainable for the local ecosystem. It is not gradual enough to allow the systems in place to adjust and sustain growth and reproduction rates. 300 acres is a perfectly reasonable amount to use and regulate, and any more is for the sake of profits rather than for the wellbeing of the environment. Should the oyster population, for instance, be threatened, then water quality will decrease without the filter feeders cleaning the water of dust and microorganisms that could harm fish, humans, and ultimately profits.

Should Coast Seafood choose to not move forward and make do with the current 300 acres, they will find more profits in the long run by sustaining the replenishing ecosystem. The additional 200 acres, while tempting, would quickly exhaust the land and leave nothing to be replenished. It is in the best interest of the public, the environment, and the company to cap the number of acres under cultivation at 300 acres total.

Thank you, Kate Panebianco

From: Jeffrey M Black [<mailto:jeffrey.black@humboldt.edu>]

Sent: Wednesday, January 18, 2017 1:59 PM

To: jcrider@humboldt-bay.org

Cc: phiggins@humboldt1.com

Subject: concern about FEIR oysters and eelgrass issue

Hello Jack. I meant to cc you on the email below. Please make a note regarding my concerns about assumptions and misuse of our previous work as mention in my letter to Pat Higgins.

Thanks for all that you are doing. Cheers, Jeff ----- Forwarded message -----

From: Jeffrey M Black <jeffrey.black@humboldt.edu>

Date: Wed, Jan 18, 2017 at 10:32 AM

Subject: Re: Can't Meet Tomorrow - Open to Scientific Arguments

To: phiggins@humboldt1.com

Cc: Scott Frazer <genescottf@gmail.com>, "Weinstein, Anna" <aweinstein@audubon.org>

Pat Higgins, Chairman Humboldt Bay Harbor, Recreation, and Conservation Dist.

Hello Pat,

Thank you for cc'ing me on your email of 11 Jan. Sorry it took this long to reply. I've been preparing for the new semester and the next cohort of natural resources management students here at HSU.

I see what you mean now about the FEIR; it is quite lengthy. I have not assessed every point in the document, but can comment on the assumptions in your email.

Please know that I, for one, do not agree with the assumption that there is no negative impact to eelgrass growth, or to shorebirds, or brant due to current or proposed farming

activities in the bay. No disrespect to those that prepared the document, but I found the rebuttals in favor of mariculture expansion to be quibbling over details. My concerns about misuse of our effort to understand and predict black brant behavior in response to sea level rise (Stillman et al. 2015) remains.

I encourage you to stand firm in your convictions to protect Humboldt Bay's eelgrass community (i.e. the soil, plants, and animals) from further degradation by corporate entities. I would encourage you to not compromise any more than 'we' (meaning the broader community living here) already have in the past.

With regard to the ongoing decline in wetland quality in the Upper Klamath Wildlife Refuge complex, I wholly agree that this is unacceptable. I second your call to Audubon California to make that a very top priority.

Regards, Jeff

January 19, 2017

From: Ted Romo [<mailto:blackbrantsky@yahoo.com>]

Sent: Wednesday, January 18, 2017 6:29 PM

To: Jack Crider <jcrider@humboldtбай.org>

Subject: FEIR Responses

January 18, 2017

Jack Crider

Executive Director Humboldt Bay Harbor, Recreation and Conservation District

601 Startare Drive

Eureka, CA 95501

Fax: (707) 443-0800

Email: jcrider@humboldtбай.org

Dear Mr. Crider:

I have concerns regarding the issues in Coast Seafoods FEIR. The Topical Responses are generically lumped into eight broadly based answers and parts of my letter were not even referred to in the comments. I feel that most of HBHRC's responses to my comments were not completely thorough, not entirely accurate, and were very broadly written.

Sincerely,

Ted Romo

3419 Edgewood Rd.

Eureka, CA 95501

(707) 496-0525

Email: blackbrantsky@yahoo.com

Mr. Pat Higgins, Chairman
Humboldt Bay Harbor, Recreation, and Conservation Dist.
601 Startare Drive
Eureka CA 95502

Jan 16, 2017

Dear Mr. Higgins:

This letter is submitted to call your attention to deficiencies with the Final EIR for the Coast Seafood project that will be considered by your Board of Commissioners on Jan. 19, 2017.

Specifically, responses to several points made in my Sept. 2016 letter of comment were not responded to appropriately, adequately, or in some cases at all. The first example of the absence of a response which would be appropriate for the comment made is on page 3-281 addressing "Comment No. 58-1" which in part states that "deny permits for phase II, and eliminate all oyster production in the East Bay Management Area." The "Response to comment no. 58-1" refers me to Topical Response 5, FEIR Section 4, and informs me that the Harbor District has included an additional alternative, the EBMA Avoidance Alternative, which does not propose any expansion of Coast's operations within the EBMA. None of these responses addresses either of my comments that "permit for phase II" should be denied or that the existing oyster production in the EBMA should not be permitted for renewal or continued operations. Instead the document removes oyster production on the West side of the Arcata channel in mitigation for a portion of the 0.25 acre per acre of new development.

The impacts of Phase II have not yet been determined. Processing and providing a Harbor District permit for Phase II without requiring or knowing what mitigation is necessary is a mistake. Permitting Phase II development at this time without mitigation is not appropriate.

The "Comment No. 58-2" on page 3-281 concludes with a request that "The final EIR should show all math calculations made addressing trampling impacts." These calculations were not provided. Nowhere in the Final EIR on CD that I picked up from the Humboldt Bay Harbor, Recreation and Conservation District office does the document provide the calculations that are the basis for a finding of "no significant effect". The response given may be appropriate to address shading effects, but it does not acknowledge the problem Comment 58-2 was addressing, which is that the narrative description of how Coast Seafoods staff walk on the eelgrass beds is not being accurately measured, projected, or mitigated.

The response to Comments 58-2 and 58-3 is not appropriate to address statements made in the R-DEIR about trampling of eelgrass and the loss of foraging opportunities to brant. No numerical data are being provided to explain or respond to the comment that "spatial overlap between culture areas and habitat is not a quantification of impact..." is a false statement.

Additionally, Topical Response #2 relies on a discussion of Impact Bio- 25 which includes and relies on use of Mitigation Measure Bio-1 (which is the measure to change spacing on 100 acres of existing oyster culture). Since the Final EIR proposes new and different Mitigation measures how is this reference in Topical Response #2 still appropriate? The multiple changes and lack of clear or concise responses to Public comments is confusing and leads to a failure of the Final EIR to accurately or adequately respond to public comments. Comment 58-3 and 58-4 raises the issue that brant avoid foraging within the oyster plantings. Black brant avoid oyster culture areas during the majority of each low tide cycle. The period of low tide is the time that brant are able to forage most efficiently and the most nutritious portions of eelgrass are available to brant.

The justification for not fully addressing the adverse impacts to eelgrass and loss of foraging opportunities by Pacific black brant on eelgrass is not contained in the response to Comment 58-3. Further the Final EIR does not even plan to monitor the loss of foraging opportunities to black brant or address Comment 58-4. The monitoring only proposes to monitor the presence and density of eelgrass inside of the oyster developments. This means that your staff, the EIR authors and possibly your Commissioners have failed to recognize and address impacts that oyster development has on brant. The mitigation ratio contained in Section 4 of 0.25 acre of oyster development removed for each 1 acre of expanded oyster development is based on the approach that the Response to Comment 58-3 presents. However, this mitigation is not appropriate or adequate. The mitigation offered is considered inadequate as addressed in Comment 58-7 and further the comment asks for Phase II to be processed as a separate project at a later date. The deletion of Phase II is not considered or addressed in the response to Comment 58-7

The response to Comment 58-7 restates the use of Mitigation Measure Bio-1 to "fully mitigate for the projects impact to eelgrass." The Final EIR indicates that changing spacing on 100 acres of existing oyster culture is no longer the method of mitigation proposed; rather removing existing oyster culture areas is the newest proposed mitigation measure. This seems to make the Response to Comment No. 58-7 references to the R-DEIR use of Mitigation Measure BIO-1 an error or editorial mistake? An explanation of the Response to Comment 58-7 regarding changes made to Mitigation Measure Bio-1 is needed or the result is a flawed approach to project mitigation.

Computer modeling based on a paper by Stillman et al. is used as a justification for findings of No Significance; yet two co-authors of the Stillman research, Dr. Jeff Black and David Ward have informed you in a letter of comment submitted in review of the Recirculated Draft EIR that the research has been misapplied. This along with more recent comments by Dr. Rumrill about how his research is used "out of context" should give you pause and needs to be addressed BEFORE you consider issuing permits based on a flawed final EIR.

Comment 58-8 addresses Cumulative impacts. The Response to Comment 58-8 fails to address the seasonal shortages of adequate forage resources needed by American Widgeon which are described in the study quoted in Comment 58-8. Simply stating that "while eelgrass is an important source of widgeon diet, there are other sources of vegetation available for widgeon foraging." does not accurately; appropriately or adequately respond to the comment.

The R-DEIR states on page 7-2 that the Pre-Permitting project for additional oyster expansion has been reduced in size to "no more than 177 acres". This number conflicts with statements made by HBHRCD Executive Director, Mr. Jack Crider on Jan. 6, 2016, who informed me that the current efforts under "Pre-Permitting" were reduced to 200 acres. Because the correct numbers of acres that will be affected by two additional oyster production proposals promoted by HBHRCD are not addressed accurately in the Final EIR, the Cumulative Impacts analysis is flawed and inadequate.

For all of the reasons listed above, I request that you should seek answers to the questions and comments submitted during the public comment period for the R-DEIR. Additionally, I request that no permits be issued to Coast Seafoods, based on this document.

Sincerely,

Scott Frazer

P.O. Box 203 Blue Lake, CA 95525

Humboldt Bay Harbor District
Startare Drive
Eureka, California 95501
January 14, 2017

Re: Public Comment Coast Seafood FEIR

I find the final environmental impact report for Coast Seafood's proposed expansion inadequate and incomplete.

- *Baseline Data* -- It appears that the drafters of this EIR have used Coast Seafood's (CS) current (2007) permit "foot print" as the baseline for evaluating possible future environmental concerns or impacts due to increased mariculture activity in North Humboldt Bay. This is absurd. This would be like defining a forest as an "area with trees, half of which have been cut down by loggers". The proper baseline for any and all evaluations of mariculture impacts is North Humboldt Bay with no mariculture activities. This EIR is not valid based on the faulty premise of applying Coast Seafood's last permit "foot print" as the current baseline.
- *Proposed Mitigation Rate* – Coast Seafood is proposing a 4:1 ratio for mitigation of their proposed impacts to critical habitat in North Humboldt Bay. Again – the metaphor of the forest. The loggers, after cutting half of the trees down are now proposing to cut more and agree to plant one new tree for every 4 they cut. This not only ignores the first half of the forest they have taken, but also ignores the blatant fact that Coast Seafood cannot replace intertidal habitat. It is a documented fact that eelgrass meadow density declines significantly within longline oyster culture. While scientific papers refer to shading of eelgrass, my concerns for eelgrass damage via trampling by walking on these beds and damage by mechanical harvesting are far more significant and are inadequately addressed by this EIR.
- *Night Operations* – The Coast Seafood EIR inadequately addresses the current changes in Coast Seafood's night operations in North Humboldt Bay. Within the last 2 years, CS has radically increased the intensity and distance of illumination during their nighttime operations. Now, nearly all of their vessels and scows are equipped with very high-intensity LED light bars. My direct experience both on the bay and on the ocean (while commercial fishing), is that these highly intense directional lights can have a blinding affect even when viewed as far away as three nautical miles. The EIR inadequately addresses the impact to waterfowl and migrating fish by intense night time illumination. Coast Seafood is the only oyster grower with major nighttime activities ongoing throughout the year.
- *Required Reporting by Coast Seafood* – As a condition of their expired mariculture permit, Coast Seafood was required to report any event of spawning Pacific Herring, and cease all mariculture operations in the area of the reported spawning activity. Coast Seafood has never reported a herring spawn ever! They have not reported a spawn even as the herring fishery was taking place week after week next to the Coast Seafood East Bay and Gunther Island oyster beds. They have not reported a spawn when the entire East Bay Management Area was covered for two weeks with feeding migratory water birds. They have not

reported a spawn when their employees observed herring swimming at their feet nor when herring came up on the harvester conveyor belt. This EIR makes no mention of Coast Seafood's violation of previous permit conditions and so this EIR is incomplete in the evaluation of Coast Seafood's operational impact. This EIR also makes no provision for long term monitoring of impacts to waterfowl feeding behavior and is inadequate.

- *Cumulative Impact* – The Coast Seafood EIR minimizes the long term cumulative impact of all mariculture in North Humboldt Bay. At present, there is over 400 acres of active mariculture in North Humboldt Bay. Coast Seafood's EIR proposes additional acreage while not truthfully evaluating the massive impacts of the Harbor District's Expansion Project, Coast Seafood's current operations and that of existing small community oyster operations. Also not mentioned under cumulative impacts are the areas (both tidal and submerged) negatively impacted by abandoned sites, some dating as far back as 1896. This EIR is incomplete in evaluation of long term cumulative impacts to the north Humboldt Bay environment.
- *Plastic Mariculture Debris* – Coast Seafood EIR makes no mention of the massive amounts of plastic mariculture debris introduced in the last ten years in North Humboldt Bay, primarily by Coast Seafood. Coast Seafood is responsible for "installing" over 40 miles of ¾" PVC pipe cut into 18" long stakes. These stakes are topped with at least 80 miles of ¼" yellow polypropylene rope strung with oyster clutch. Coast Seafood's newest contribution, black ABS cages (6" X 24") with half of a 6" diameter PVC crab buoy attached with nylon tie-straps and sealed with multi-colored plastic name tags are now becoming a common item in Humboldt Bay Marshes and even on outside ocean beaches. Black, red, and blue plastic vexar bags, 24" X 24" mariculture trays and various lengths of 2" PVC pipe are also common marsh debris. The Coast Seafood EIR does not adequately address current and future impacts of the massive introduction of plastic into this marine environment nor does it address requests for a two million dollar performance bond from Coast Seafood for their mariculture debris clean-up. It is a federal offense and violation of international law to introduce any plastic material into bays, estuaries or the ocean. Coast Seafood is in violation of these laws.

The Coast Seafood EIR is incomplete and inadequate in its responses to public concerns for the long term health of Humboldt Bay. Humboldt Bay is a small bay, which most likely reached its natural ecological carrying capacity millennia before the mariculture invasion. Mariculture should be held at current levels with no expansion for Coast Seafood.

Based on the timed release of this EIR during the Christmas and New Year holiday season and the fact that the Harbor District plans to approve this EIR on January 19, 2017, I have absolutely no faith that the comments contained herein will be adequately considered in this request in support of the "public interest" for the health of Humboldt Bay.

Ken Bates, Linda Hildebrand