



Board of Directors

November 26, 2019

Bridger Mitchell, Ph.D.
President

California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090

Ken Drexler, Esq.
Vice-President

Via electronic delivery to: fgc@fgc.ca.gov

Terence Carroll
Treasurer

Re: Comments on FGC Agenda Item 34
Charles Friend Oyster Company State Water Bottom Lease
No. M-430-04

Cynthia Lloyd, PhD
Secretary

Dear Commissioners,

Sarah Killingsworth, Esq.

Jerry Meral, Ph.D.

Claire Seda

David Weinsoff, Esq.

David Wimpfheimer

The Environmental Action Committee of West Marin (EAC) is based in Point Reyes Station and has been working to protect the unique lands, waters, and biodiversity of West Marin since 1971. Since our inception, we have been committed to the health of West Marin's estuaries, bays, and watersheds including our strong focus on Tomales Bay.

Staff

Morgan Patton
Executive Director

Ashley Eagle-Gibbs, Esq.
Conservation Director

Jessica Reynolds Taylor
Development Director

Patricia Wimpfheimer
Bookkeeper

We submit brief generally supportive comments, which we may supplement, regarding Agenda Item 34, Charles Friend Oyster Company State Water Bottom Lease No. M-430-04. We remind the Fish and Game Commission (Commission) that we have been advocating to the Commission for aquaculture best management practices since 2015. Many of the goals supported by a best management practices rulemaking have been accomplished through the California Coastal Commission's (CCC) coastal development permit (CDP) amendments, in which the CCC is including enforceable permit conditions around marine debris and other environmental considerations. We continue to support the CCC's efforts and your Commission's consistency with these efforts.

November 26, 2019
EAC Comments re. Agenda Item 34

While many improvements have been made on Tomales Bay related to the loss of aquaculture marine debris, the Bay continues to depend on all of the state agencies' close attention to any and all industrial practices on the Bay.

We appreciate the Commission's careful consideration regarding compliance before the extension of a lengthy lease term. That being said, we understand that Charles Friend Oyster Company has made significant progress towards compliance, and we are supportive of the 15-year extension.

We thank Charles Friend Oyster Company for their willingness to come into compliance and work with local stakeholders, as well as the state agencies. In sum, we appreciate your consideration of our comments; and without a chance to review the binder, we are in general support of Agenda Item 34.

Respectfully,



Morgan Patton
Executive Director



Ashley Eagle-Gibbs
Conservation Director

cc: Susan Ashcraft, California Fish and Game Commission
Elizabeth Pope, California Fish and Game Commission
Heidi Gregory, Tomales Bay Oyster Company