

CALIFORNIA COASTAL COMMISSION

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November 2, 2018

Oscar Peña
General Manager
Ventura Port District
1603 Anchors Way Drive
Ventura, CA 93001

Re: **Consistency Certification No. CC-0009-18 – Ventura Shellfish Enterprise**

Dear Mr. Peña:

On October 4, 2018, the California Coastal Commission (Commission) staff received a consistency certification from the Ventura Port District for the proposed installation and operation of a 2,000 acre facility in open coastal waters for aquaculture production of Mediterranean mussel (*Mytilus galloprovincialis*). The facility would be located in federal waters within the Santa Barbara Channel, approximately four and a half miles offshore of Solimar and eight miles offshore of Ventura Harbor in Ventura County, California. Mussel cultivation would be carried out using a system of submerged lines, anchors and buoys and is anticipated to result in the production of up to 22 million pounds of mussels per year.

The Commission staff has reviewed your consistency certification and supporting materials and determined that the consistency certification remains incomplete and cannot be filed pursuant to Section 930.58 of the Coastal Zone Management Act (CZMA) until the following additional information is provided.

Project Description

1. *Shellfish Cultivation Equipment*: Please indicate the total number of proposed mussel lines that would be used on the project facility and describe the length, composition, size, and cultivation capacity of these devices.
2. *Floatation Devices*: Please indicate the number, type, size, and capacity of all proposed buoys or floatation devices to be used on the farm structure.
3. *Installation*: Please provide a detailed description of the manner in which the proposed farm structure would be installed/deployed. Please describe (a) all support equipment and devices that would be used during installation of anchoring devices, longlines, cultivation equipment and shellfish product, as well as (b) the proposed timing of the installation (duration and time of year); (c) any project staging that may be required (i.e. the use of a staging barge, support vessels, etc.); (d) the anticipated underwater sound levels (in dB) that would be generated by the proposed anchor installation drills and machinery; (e) the process that would be used to select the specific anchoring points; and (f) any contingency measures or alternative anchoring approaches that would be used if

the substrate at the project site does not allow for the use of the proposed helical sand anchors.

4. *Planting and Harvesting:* Please provide a detailed description of proposed shellfish planting and harvesting activities. Please include a description of (a) the equipment and vessels that would be used during planting and harvesting; (b) the frequency of planting and harvesting activities; (c) the manner in which planting and harvesting would be carried out; (d) the water source and volume of water to be used during onboard shellfish cleaning and packing operations; (e) the equipment that would be used for onboard shellfish cleaning and packing; and (f) the manner in which waste water and material would be captured, contained and disposed.
5. *Inspection and Maintenance Activities.* Please clarify the scope and target of proposed inspection activities (i.e. would all equipment, longlines, buoys, cultivation lines, and anchors be inspected during each effort?) and the manner in which inspections would be confirmed as complete. Please also describe the frequency with which maintenance activities (including material and equipment replacement) would be carried out.
6. *Structural Stability:* Please provide an engineering analysis of the proposed structure and anchoring/mooring system that demonstrates its performance under un-stocked conditions and at maximum shellfish cultivation density under both 20-year and 100-year storm events.
7. *Vessel Transit/Travel Routes.* Please provide a figure showing the transit route that would be used for project vessels traveling between Ventura Harbor and the project site. Please also indicate if project vessels would be required to “home port” in Ventura Harbor and offload all harvested mussels at that location or would be able to use other harbors and ports in the region.
8. *Harbor Infrastructure.* Please clarify if the proposed project would include harbor or shore-side development or construction activities, including the expansion or modification of docks or shellfish offloading, receiving, storage, loading, packing and trucking facilities in Ventura Harbor needed to handle the anticipated 22 million pounds of annual mussel harvest. Please also describe the range and volume of activities that would occur within Ventura Harbor as a result of the proposed operation of the offshore shellfish cultivation facility (including the estimated number of trucks that would enter and leave the harbor each day as part of shellfish packing and transport).
9. *National Shellfish Sanitation Program (NSSP).* Please describe the NSSP-compliant protocols and efforts that would be carried out as part of mussel planting, cultivation and harvest.
10. *Research Activities:* Several references are made in the consistency certification to research activities and projects that would be carried out on the proposed facility by qualified researchers and institutions. Please describe the type of proposed research activities that would be carried out as well as the equipment, machinery and support facilities that would be needed to support this research.
11. *Predator Control.* Please provide a complete list of the equipment, methods and activities that would be used to manage or control predation on the cultured mussels at the proposed facility.
12. *Construction Timeline.* Please indicate the maximum amount of time that would be provided for installation of longlines, individual plots and the full 2,000 acre facility.

13. *Monitoring and Installation.* Please clarify the point at which the proposed monitoring activities would be initiated. For example, would monitoring begin after installation of the first longline, after installation of the first 100-acre plot, or upon complete installation of all 20 plots? How would the proposed monitoring activities be affected by delayed or partial installation of longlines or plots?
14. *Decommissioning and Removal.* Please provide a decommissioning plan that describes who would be responsible for decommissioning and removal and the manner in which removal of the cultivation facilities, anchors, and associated infrastructure would be carried out. Please also describe the financial assurance mechanism that would be used to help ensure that adequate funding for removal is available and the process that would be used to determine the initial funding amount and the frequency with which this funding amount would be reassessed or updated.
15. *Lease/Sub-permit/Operator Contract.* Please provide a copy of the sub-permit or contract that would be used for growers/operators. Please clarify if the size of grower/operator sub-permitted operations would be limited to the 24 proposed longlines within a single 100-acre plot or could include a different number of longlines and plots.

Sediment Quality Monitoring Plan

16. Please provide a complete copy of the Sediment Quality Monitoring Plan that would be implemented as part of the proposed project – including the sampling methodology (frequency, type, number and distribution of samples) that would be used; the analysis methodology that would be used; the reporting structure for results; the personnel that would be used to carry out the sampling and analysis; the action thresholds that would be established for the monitoring results; and the actions that would be triggered by exceedances of these thresholds.

Marine Wildlife Entanglement Plan

17. Please provide a complete copy of the Marine Wildlife Entanglement Plan that would be implemented as part of the proposed project – including the inspection, analysis and reporting methodology that would be used; the personnel and equipment that would be used to carry out inspections; the action thresholds that would be established for the inspection results; and the actions that would be triggered by exceedances of these thresholds.

Spill Prevention and Response Plan

18. Please provide a completed copy of the Spill Prevention and Response Plan that is proposed to be implemented on vessels and work barges used during facility installation and operation.

Aquaculture Gear Monitoring and Escapement Plan

19. Please provide a completed copy of the Aquaculture Gear Monitoring and Escapement Plan that is proposed to be implemented during facility installation and operation.

Marine Debris Management Plan

20. Please provide a completed copy of the Marine Debris Management Plan that is proposed to be implemented during facility installation and operation.

Substrate Survey Results

21. Please provide the results of site specific substrate surveys of the proposed anchoring/mooring device installation sites and adjacent areas. This survey should document the substrate type(s) and biological resources present at the proposed anchoring/mooring locations and adjacent areas.

Compliance

22. The project description notes that the Port District would obtain all necessary permits and authorizations for commercial aquaculture activities within the 2,000 acre project site and would then lease or sub-permit smaller areas within this site to commercial enterprises. The project description also notes that the Port District would oversee activities on the leased or sub-permitted areas to ensure compliance with all applicable permits and authorizations. Please describe how this compliance program would be designed and implemented and how potential issues of non-compliance would be resolved.

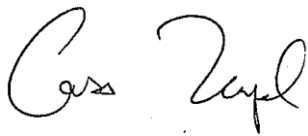
Filing Fees

To date, you have not yet submitted a consistency certification filing fee to the Commission for the proposed project.

23. Please submit the appropriate filing fee based on total project development costs and the Filing Fee Schedule available as Appendix E of the Application Form available online at: https://documents.coastal.ca.gov/assets/cdp/CDP_Application_Form_Energy.pdf. A calculation of total development costs should include all expenditures, including the cost for planning, engineering, architectural, and other services, made or to be made for the designing of the project plus the estimated cost of construction and implementation of all aspects of the project.

Pursuant to 15 CFR §930.60(a), the 6-month time period for review of this submittal has not begun and will not begin until the Commission staff receives all of the information discussed in this letter. If you need any further assistance or have any additional questions, please contact me at (805) 585-1825.

Sincerely,



CASSIDY TEUFEL
Senior Environmental Scientist
Energy, Ocean Resources and Federal Consistency Division

cc: Melis Okter, Dudek