JULY 8, 2015

BOARD OF PORT COMMISSIONERS

WORKSHOP ITEM 1

VENTURA HARBOR SHELLFISH PRODUCTION INITIATIVE

VENTURA PORT DISTRICT **WORKSHOP TOPIC**
BOARD COMMUNICATION Meeting Date: July 8, 2015

TO:	Board of Port Commissioners
FROM:	Commissioner Ev Ashworth, Vice-Chair
SUBJECT:	Ventura Harbor Shellfish Production Initiative

RECOMMENDATION:
That the Board of Port Commissioners receive a presentation on the importance to initiate a program for bringing sustainably cultivated shellfish farms to Ventura Harbor and the Ventura Port District's grant application to support the Ventura Shellfish Enterprise.

SUMMARY:
In 2007, the District collaborated in a project with the California Sea Grant Extension Program, University of California Cooperative Extension on a study to evaluate the current and future status of commercial fisheries and associated infrastructure needs and options for the Santa Barbara Channel (SBC) region. This included four harbors – Santa Barbara, Ventura, Channel Islands, and Port Hueneme. An assessment was made on the infrastructure needs for these harbors and an analysis of the diversity of commercial fisheries in the SBC region. While the detail on infrastructure is important, there was clearly a need for the Ventura Harbor to work with the commercial fisherman to identify new sustainable fisheries to off-load in the Ventura Harbor, other than California Market squid.

The District supports the efforts of the Ventura Shellfish Enterprise (VSE) to develop sustainably cultivated shellfish farms as a potential of increasing production of domestic shellfish for sustainable food supply independence. Without reinforcing the viability of the commercial fishing industry in the Ventura Harbor, and improving the diversification of fisheries, the potential federal funding for dredging is potentially at risk in the future.

VSE is a multi-party collaboration to initiate a program for bringing sustainably cultivated shellfish to market in 3-5 years. This project is unique in that it proposes offshore cultivation of bivalve shellfish under an umbrella of pre-permitted leases and best management practices. The Ventura Port District will be the lead stakeholder, and will leverage this project to enhance the value and sustainability of existing commercial infrastructure based in the Ventura Harbor. The project will also provide a successful permit template that can be applied to other areas of the California Coast to realize additional shellfish production in the state.

Collaborators include UC San Diego – Scripps Institution of Oceanography (Dr. Paul Olin), the California Department of Fish & Wildlife (Randy Lovell, State Aquaculture Coordinator), the National Oceanic and Atmospheric Administration (Diane Windham, Aquaculture Coordinator, California), UC Santa Barbara Marine Science Institute/Bren School (Dr. Sarah E. Lester), The Culture Abalone Farm (Doug Bush, General Manager), Coastal Marine Biolabs (Drs. Linda Santschi and Ralph Imondi) and the Ventura Port District. Technical assistance will be provided by scientists that have permitted offshore mussel farms on the East Coast (Scott Lindell), and technical consultants that are assisting in pre-permitting oyster operations for the Humboldt Bay Harbor, Recreation, and Conservation District (Dudek Consultants).

Earlier this year, a grant application was submitted to NOAA through the agency's Sea Grant Program. VSE seeks $300,000 in Sea Grant funding over a two-year period for the permitting phase of this project. This phase has three objectives: (1) preparing a permit strategy for the complex web of federal, state and local permits and authorizations prerequisite to project

launch; (2) preparation of permit application packages for submission to the identified government agencies; and, (3) development of a consumer education and marketing plan for the product shellfish, which will also support the permitting effort.

This grant will allow VSE to contract with qualified consultant(s) to develop a permitting strategy and prepare all necessary permit application components, baseline studies and proposed permitting terms and conditions, including necessary mitigation and monitoring, plus the consumer education program.

Port District staff would like to thank Commissioner Ashworth and the VCE team for collaborating these efforts and in working together to create the grant application and we hope the grant gets approved.

ATTACHMENTS:
Attachment 1 – Project Description
Attachment 2 – Letters of Support

Project Description

VENTURA SHELLFISH ENTERPRISE: STRATEGIC PERMITTING INITIATIVE TO SUBSTANTIALLY INCREASE SHELLFISH FARMING IN SOUTHERN CALIFORNIA

This proposal responds to the 2015 NOAA Sea Grant Aquaculture Extension and Technology Transfer grant opportunity, No. NOAA-OAR-SG-2015-2004399.

Introduction: Increasing the supply of safe, sustainably produced domestic seafood is a priority for NOAA and the Department of Commerce. The Ventura Shellfish Enterprise (VSE) is a multi-stakeholder initiative that seeks to permit and manage a commercial bivalve shellfish aquaculture operation consistent with this objective. Globally, bivalve shellfish culture is technically proven as a method for the production of high value seafood with limited environmental impacts. However, the permitting process in California for such production is uncertain and not adequately developed to attract participation. VSE seeks to address several regulatory and planning challenges that create impediments to the expansion of a domestic marine shellfish culture industry in California.

As a member of VSE, the Ventura Port District (VPD) will hold all entitlements for a group of offshore aquaculture leases that will in turn be subleased to individual producer-fishermen for shellfish farming. These sublease opportunities will be marketed to both existing VPD commercial fishermen, commercial shellfish businesses, and startups who, in the absence of a pre-permitting structure, would be disinclined to embark on the required regulatory pathway. In return, and as a requirement of their tenancy, sub-lessees will agree to operate under robust environmental monitoring guidelines and best management practices adopted from third party certification agencies. The economic value of shellfish landed at existing harbor facilities will both directly and indirectly benefit VPD, and thereby work to invigorate its working waterfront community. This novel approach will bring an economy of scale to not only the regulatory barriers, but to aspects of ongoing environmental monitoring, marketing and distribution, turning traditionally cumbersome aspects of shellfish business management into opportunities for growth. Development of education and research, retail entrepreneurship, and community engagement with comprehensive environmental planning are all realistic ancillary benefits of this initiative.

This project proposes to create a complete set of multi-agency permit applications for the VSE, using the expertise of a wide array of policy, legal, scientific, and industry representatives from both the private and public sector and a groundswell of in-kind participation. This output will help to create a permitting pathway for subsequent projects. Further, a method for compliance with the National Shellfish Safety Program in offshore production grounds will be developed in collaboration with the California Department of Public Health.

Project Goals, Objectives and Activities: The objectives of this project proposal are to develop:

- A technically sound and thorough strategy to successfully obtain all required government entitlements necessary to establish twenty 100-acre aquaculture leases in the state waters of the Santa Barbara Channel;
- Successfully permitted applications for the leases, associated environmental review documents, and completed baseline sampling protocol and data necessary for a California Department of Public Health (CDPH) Shellfish Growing Area Certificate; and,
- A comprehensive outreach strategy aimed at soliciting the support and participation of various stakeholders by educating prospective commercial fishermen, investors/entrepreneurs, shellfish processors, and consumers about the benefits of locally sourced and sustainably raised mussels.

The specific grant activities planned to achieve these objectives are outlined in the Logic Model at the end of this (below), which includes short-, medium- and long- term project contributions supporting the Strategic Plans of NOAA and the National Sea Grant College Program.

Need for the Project: It is widely recognized that the U.S. needs to boost domestic seafood production. At present, there is only one commercial aquaculture operation producing mussels in California waters (160,000 pounds per year). The current low level of production underscores the existence of significant regulatory and statutory barriers to commercial shellfish production, especially for small businesses. Numerous sources provide extensive lists of permits and entitlements required to initiate commercial shellfish operations (*see e.g.*, ref 1). However, there is widespread recognition that these lists do not adequately prepare stakeholders for the broad and complex array of technical and bureaucratic hurdles inherent to the approval process, *e.g.,* site selection criteria; baseline monitoring program design and execution; selection of optimal gear; and critical paths for securing approvals (ref 2). Given the time and financial burden presently needed to secure approvals which can exceed three to four years and is often cost prohibitive, there is an obvious need to develop a viable and replicable model that facilitates the approval pathway for prospective shellfish growers/producers (ref 3).

The overall VSE objectives are for VPD to obtain entitlements for twenty 100-acre shellfish aquaculture leases in state waters of the Santa Barbara Channel, establish best management practices for commercial fisherman sub-lessees, coordinate comprehensive monitoring and reporting for all the leases, and leverage existing underutilized onshore facilities at Ventura Harbor for processing and shipping the sub-lessees' shellfish product. (*See* letters of support from J. Friedman, R. Bartosh and J. Roggio re Ventura Harbor facilities.) This strategy is modeled after the approach being used by the Humboldt Bay Harbor, Recreation and Conservation District for oyster cultivation in Humboldt Bay; the District has applied for a set of master permits with a plan that individual operators will sub-lease pre-permitted areas from the District.

The tasks outlined in this proposal and in the Logic Model below will contribute significantly toward overcoming the identified barriers to new aquaculture operations, promote additional mussel cultivation through VSE, and will address Sea Grant's priority to significantly advance sustainable domestic aquaculture. Likewise, the project is in alignment with Sea Grant's goal to contribute to "a safe, secure and sustainable supply of seafood to meet public demand."

Extension Work Plan: The project tasks outlined in the Logic Model are described here in further detail.

Task 1: The project team will develop a strategic permitting plan, including a project permitting schedule and critical path analysis. As indicated above, the permitting process for aquaculture in California waters is complex and difficult to navigate. Careful permit pathway planning and early agency consultation will smooth the process and increase the likelihood of success. Beyond identifying relevant permits and approvals, the strategy will involve: coordination of the various entitlements to ensure that the project moves forward as efficiently as possible; early engagement with stakeholders (*e.g.*, recreational and commercial fishing organizations, ENGOs, etc.); identifying and resolving issues in the project descriptions, conditions of approval and mitigation measures to avoid impacts and additional regulatory requirements; and, ensuring that the project complies with all procedural and substantive legal requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). In addition, pre-application coordination and continuous feedback from interested agencies will be critical to successfully identifying the necessary data requirements and recommended permitting mechanisms to efficiently complete the permitting process.

The project team will outline the minimum attributes of the permit strategy. Overall coordination will be provided by Project PI Olin and key to this effort is the expertise of Co-PI Scott Lindell and his experience in securing permits for commercial mussel operations in state and federal waters in Massachusetts. Active participation of California's state and federal aquaculture coordinators, Co-PIs Randy Lovell and Diane Windham respectively, will facilitate inter-agency coordination. The team will solicit qualified technical consultants to fully develop the strategy under direction of the co-principal investigators. Given the complex procedural, legal, and substantive aspects of CEQA, legal counsel will be retained to assure the accuracy of the permitting strategy. The co-principal investigators and outside counsel will review the consultant-prepared draft strategy.

Selection criteria for technical consultants and outside counsel are: experience in California aquaculture permitting efforts; established professional relationships with agency staff; cost-effective staffing and management; and, ability to meet project schedule requirements. The project team will be actively engaged with consultants to ensure all environmental concerns are addressed.

Task 2: This task will involve the preparation and submittal of all necessary permit applications as well as documentation needed for government agency reviews and clearances. This task will also include the preparation of the necessary Environmental Impact Report (EIR)/Environmental Impact Statement (EIS). This parallel processing of permit applications and these environmental review documents has been effective in other contexts to significantly reduce cost and time to secure full project entitlements.

Specifically included in this task are consultant-prepared biological assessments necessary for consultations under state and federal wildlife protection statutes.

The technical and legal consultants for Task 1 will be retained for Task 2.

Certification of VSG Growing Waters: In addition to environmental approvals, there is a need to secure a California Department of Public Health (CDPH) Shellfish Growing Area Certificate for VSE. Project Co-PI's Linda Santschi and Ralph Imondi with Coastal Marine Biolabs (CMB) have already initiated dialog with the CDPH Environmental Management Branch (CDPH/EMB) on this facet of the project and are working collaboratively with CDPH/EMB to:

- Jointly develop and implement a sampling plan specific to the offshore environment that meets CDPH requirements for growing area certification to include at a minimum testing for total and fecal coliform;
- Participate on a cost-sharing basis in a sanitary survey of the growing area required for issuance of the Shellfish Growing Area Certificate; and
- Explore whether the VPD Harbor Patrol can serve as the required law enforcement agency charged with ensuring that shellfish grown by sub-lessees is harvested exclusively within safe and sanitary areas as demonstrated through ongoing monitoring.

Task 2 also includes accrediting CMB as an environmental testing laboratory through the Environmental Laboratory Accreditation Program (ELAP) of the California State Water Resources Control Board (ref 5). Establishing CMB—with its state-of-the-art biosciences laboratory—as a certified laboratory is an important first step toward the broader goal of establishing a centralized pre- and post-harvest monitoring and testing facility for VSE at the Ventura Harbor, which will minimize project costs in the long term and reduce the burden of expertise and resources on individual VSE growers (*See* ref 6,7,8).

Task 3: Success in achieving the overarching project objective of increasing domestic shellfish production relies upon establishing a well-informed community of stakeholders. To this end, our extension plan includes two education and outreach components: (1) launch of an open-access project website and social media initiatives and (2) a series of eight or more educational workshops covering the subjects described below.

Website and Social Media: Key to project outreach is the early launch of a project website and social media portals. These platforms will be maintained throughout the life of the project.

The website will be created and maintained by CMB's internal media group (*See* refs 9, 10, 11, 12 re CMB expertise). The initial version of the VSE website will include: (1) basic information on shellfish aquaculture, its safety and sustainability, and the health benefits of seafood consumption; (2) a lay description of the proposed project and its objectives; (3) periodic updates on key project milestones; (4) a descriptive calendar of workshop events; (5) online registration for workshop attendees (including a back-end administrative database to capture contact and demographic information); (6) a video archive of past workshop presentations; (7) links to relevant external websites and existing digital outreach materials (*e.g.,* ref 4, 13, 14); and (8) information on key project personnel. The state agencies' joint aquaculture site, AquacultureMatters.ca.gov, will also be engaged to help further disseminate information on the project and extend the project's outreach and education activities.

Project information, updates, and events will also be disseminated via a Facebook page

for the project and a Twitter account managed by the VPD marketing department. All contacts gleaned from the website and social media will be offered the opportunity to sign up for project emails, the distribution list for which will be maintained by the VPD marketing department.

The success of website engagement and social media penetration and effectiveness will be assessed using standard web analytics combined with information collected from workshop attendee questionnaires to evaluate and report the overall impact and efficacy of the project's education and outreach efforts.

Workshops: Workshop events will be announced to the general public by the VPD marketing department (via press releases, social and digital media outlets, etc.) and posted on the project website as well as the state site, AquacultureMatters.ca.gov. Workshops will be recorded by professional volunteers for broadcasting through the Community Access Partners of San Buenaventura public television channel (CAPS-TV) and streaming media center (ref 15), and other media outlets. Workshop participants will be asked to complete survey-style questionnaires before and at the end of each session to assist in evaluating workshop penetration to target groups, workshop effectiveness, and interest in future workshop topics.

The following are prospective workshop topics and their target audiences. Workshops will be presented by Co-PIs, agency staff and recognized experts, many of whom have submitted letters of support.

VSE Production Site Selection The objective of this workshop will be to establish transparency on site selection criteria. The selection of individual production areas is dependent upon a constellation of different factors (e.g. avoidance of maritime traffic, hard bottom and reef structure, Marine Protected Areas, existing sea floor leases, current use patterns, etc.). These issues will be discussed in the context of coastal productivity, proximity to harbor operations, and other key environmental and logistical considerations. *Target audience*: commercial and recreational marine user groups, individuals and groups with concerns about the net environmental effects of the project, and members of the general public.

Mussel Growing Technology and Equipment Choices
Once growing sites are selected, we will host a workshop examining the options for anchoring, longline design, farming materials and associated specialized grading, socking and handling equipment. These issues will be discussed in the context of start-up and scale-up costs and benefits, and the potential for co-operative ownership and management of high-volume automated technologies. *Target audience*: prospective growing site lessees, students, educators, members of the general public, and the regulating agencies.

VSE Environmental Effects and Best Management Practices This workshop will focus on opportunities to minimize the risks of environmental impacts (including cumulative impacts or carrying capacity of the region for the project's planned production) and maximize the benefits of offshore shellfish production through management and design of grower regulations. VSE will require that growing site lessees meet or exceed Environmental Codes of Practice (ECP). ECP will be compiled from one or more seafood stewardship groups (e.g., Monterey Bay

Aquarium Seafood Watch program, the World Wildlife Fund Aquaculture Stewardship Council, the Global Aquaculture Alliance's Best Aquaculture Practices (BAP's), and Pacific Coast Shellfish Growers Environmental Codes of Practice) and will be tailored to local conditions. Data from existing offshore bivalve shellfish operations will also be presented to establish context for attendees. *Target audience*: prospective growing site lessees, commercial and recreational marine user groups, groups with concerns about the net environmental effects of the project, and the regulating agencies.

VSE Economic Projections This workshop will address the anticipated economic benefits of the project. It will present information on market demand and discuss opportunities analysis. Scenarios for economic value of landed product will be covered along with the concomitant implications for the Ventura Port District and the broader Ventura community. Direct and indirect economic effects, as well as opportunities for ancillary economic development (e.g. dockside valuation, distribution, branding and value-added opportunities, retail potential, infrastructure and maintenance commerce, etc.), will be specifically discussed. *Target audience*: state and local government officials, local business leaders, and economic workforce and development groups.

Becoming a VSE Shellfish Producer This informational workshop will address the logistics of becoming a VSE growing site lessee and help them begin to build business plans. Working drafts of tenancy agreements along with projections for startup capitalization and sources of gear, equipment and seed stock will be discussed. Existing commercial shellfish growers will be invited to share their insights and operational experience, and to highlight current opportunities and challenges faced by the commercial shellfish farming industry. *Target audience*: individuals and groups interested in leasing growing sites.

Biology of Bivalve Shellfish As filter feeders that create complex three dimensional habitat bivalve shellfish culture a unique and net-positive enterprise. Led by active researchers and collaborators, this workshop will introduce topics associated with mussel husbandry, genetics, reproductive physiology, feeding behavior, nutrition, and ecological value. Details on the production cycle of bivalve shellfish in the farm setting will also be presented. *Target audience*: prospective growing site lessees, students, educators, and members of the general public.

Shellfish: Local, Sustainable, Delicious and Nutritious Bivalves are a uniquely delicious component of the vast world of seafood and the Ventura region is rich with culinary expertise. This workshop, which we expect will be well attended, will provide cooking demonstrations highlighting the talents of local chefs and the quality of farmed bivalve shellfish, and present the unique nature of the product as a local, sustainable and healthy protein source. *Target audience*: seafood wholesalers, restaurateurs, restaurant associations, food bloggers and the general public.

VSE Shellfish Quality and Safety Assurance Demonstrating food quality and safety assurance of cultured shellfish is a particularly important aspect of the VSE project. This workshop is designed to demonstrate how the project's compliance

with California Department of Public Health requirements and other applicable guidelines and practices ensures product safety, traceability, and quality. The workshop will explain shellfish management, testing and other product monitoring and control practices. *Target audience*: Members of the general public, shellfish producers.

The selection of workshop speakers and the identification of additional focus areas will be coordinated by the project team.

Description of Partnerships: As discussed below, information obtained from two ongoing projects will contribute to successful completion of project aims and objectives.

1. *Maximizing the Value of Offshore Aquaculture Development in the Context of Multiple Ocean Uses* is a large-scale study being jointly undertaken by the Marine Science Institute, University of California Santa Barbara (UCSB), and the Biological Sciences Department, California Polytechnic State University, with Sarah Lester of UCSB as the principal investigator. The goal of this study is to develop a framework to inform marine spatial planning for offshore or open ocean aquaculture using spatial bio-economic models and tradeoff analysis to evaluate aquaculture development in the context of a suite of ocean uses and environmental effects.This research centered on the Southern California Bight, will facilitate the development of offshore aquaculture by providing a robust analytical framework for siting decisions, including those encompassed by the VSE project. (*See* S. Lester letter of support.)
2. *Programmatic EIR for Marine Aquaculture in California* is being prepared under the direction of the State Aquaculture Coordinator, Randy Lovell (a project Co-PI) and the California Department of Fish & Wildlife (CDFW) with project PI Olin as a close collaborator. A draft version of this Programmatic EIR will be released for public comment sometime early in the grant term; relevant information from this document will be used to help prepare project CEQA/NEPA analyses and related studies for the applications.

Project Schedule

Task	Year 1		Year 2	
	Month 1-6	Month 7-12	Month 13-18	Month 19-24
Task 1: Permit Strategy				
Task 2: Permit applications & growing water certification				
Task 3: Education/Outreach				

The VSE is a collaborative effort among co-PIs and agency staff and timing of specific tasks must retain some flexibility. With that in mind, the permit strategy document will be completed within the first year, and permit applications and supporting CEQA/NEPA documentation will be completed within 24 months. Dialog with CDPH concerning growing area certification has already been initiated and will continue throughout the term of the grant, bearing in mind that after lease locations and boundaries have been

determined a full year of monitoring will be required. CMB will be accredited as an environmental testing laboratory within 24 months. The first of the individual workshops will be initiated in the second month; all eight workshops will be completed within 24 months.

Project Outcomes: The anticipated project outcomes and performance metrics are described in the Logic Model below. The proposed grant work will advance the Ventura Shellfish Enterprise, an innovative, collaborative offshore aquaculture project that will:

- Raise awareness and knowledge of cultured shellfish as a sustainable, commercially viable, healthy, and delicious protein source;
- Leverage existing under-utilized infrastructure at the Ventura Harbor and the expertise of the Ventura Port District in leasing commercial property and securing permits and entitlements;
- Open new opportunities for commercial fisherman and other entrepreneurs to participate in offshore aquaculture through a pre-permitted lease program creating 20 new 100 acre shellfish leases;
- Provide a cultivated mussel yield exceeding 12 million pounds/year at full operation;
- Produce sustainable shellfish with a current market value of $24 million annually;
- Employ 40-60 commercial fishermen and support at least twice as many jobs in product distribution, preparation and consumption;
- Establish a viable shellfish aquaculture framework for replication by other groups in California and the US; and,
- Fully support NOAA and Department of Commerce aquaculture policies, goals and objectives.

PCSGA

PACIFIC COAST SHELLFISH GROWERS ASSOCIATION

April 17, 2015

Mr. Paul G. Olin, Aquaculture Specialist
California Sea Grant
UCSD / Scripps Institution of Oceanography
133 Aviation Blvd., Suite 109
Santa Rosa CA 95403

Dear Mr. Olin,

On behalf of the members of the Pacific Coast Shellfish Growers Association (PCSGA), I am pleased to submit this letter of support for Ventura Shellfish Enterprise's (VSE) proposal to expand shellfish cultivation in California. By pre-permitting 2,000 acres of near-shore waters for shellfish production, this project centralizes the tasks of permitting and environmental analysis and monitoring for a multi-stakeholder platform and reduce barriers to participation in sustainable aquaculture production. The pre-permitting approach is being successfully implemented in Humboldt Bay CA and is being considered in other areas as well. VSE's proposed work will offer insight on future pre-permitting projects within California and throughout the Pacific Coast.

PCSGA represents shellfish growers from Alaska, Washington, Oregon, California and Hawaii. Many of our members represent the third, fourth and even fifth generation farmer and there is significant pride within the industry. Our members are extremely concerned about providing safe and sustainably produced high quality seafood. For nearly 90 years PCSGA has been advocating for shellfish production and providing assistance to shellfish farmers.

West Coast shellfish has soared in popularity over the past few years. Markets for the high quality, locally produced, sustainable protein that shellfish provides are increasing at a time when farmers are not meeting demand. Many shellfish growers would like to expand operations during these healthy markets. Yet questions that arise during permitting processes about ecological carrying capacity and the interaction of shellfish within the ecosystem can be daunting to an applicant, particularly a small or new business owner. The development of a permit template, created through this proposal, could be applied to other near-shoe and estuarine areas. Additionally, it will create a pathway to increase production of California shellfish and move toward sustainable food supply.

I believe the proposal submitted by VSE is consistent with National Oceanic & Atmospheric Administration's (NOAA) National Shellfish Initiative and the agency's goal to increase populations of bivalve shellfish through commercial production and conservation activities. The Initiative "recognizes the broad suite of economic, social, and environmental benefits provided by sustainably increasing shellfish," including meeting the growing demand for seafood, creating new jobs and business opportunities and providing cleaner water and nutrient removal. Similarly, I believe VSE's proposal is consistent with the recently launched California Shellfish Initiative and its collaborative approach to develop sustainable shellfish production. The cost to undertake the environmental and regulatory permitting in California is prohibitive and this approach to pre-permit, and then sub-lease

120 State Ave. NE, #142 • Olympia, WA 98501 • phone: 360-754-2744 • fax: 360-754-2743
www.pcsga.org

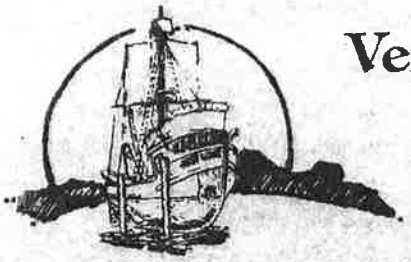
permitted shellfish culture grounds has the potential to dramatically increase the number of shellfish farms in the state.

To demonstrate support of this proposal, PCSGA is pleased to offer in-kind support. PCSGA is available to facilitate communication between our members and project leads, review and provide comment on materials, promote this work at educational events and provide outreach opportunities through our quarterly newsletter *Longlines*, our website, and through list-serves and direct communications. An estimated value of our in-kind support is $7,500.

I hope that NOAA and National Sea Grant recognize the long-term benefit this proposal would provide to current and future shellfish growers. The proposal provides benefits to the domestic seafood supply and our food security, strengthens the economic stability of coastal communities by allowing the shellfish industry to expand and attempts to break current permitting quagmire that is prohibitive to industry expansion. PCSGA encourages support of this unique proposal. I wish you much luck in the process. Please contact me if you have any questions or need additional information.

Sincerely,

Margaret Pilaro Barrette
Executive Director



Ventura Harbor Boatyard, Inc.

VENTURA HARBOR VILLAGE

April 21, 2015

NOAA Sea Grant
Agricultural Program Manager
1315 East-West Highway, R/SG
SSMC3, Room 11876
Silver Spring, MD 20910

Ladies and Gentlemen:

I write on behalf of Ventura Harbor Boatyard, Inc., Ventura Harbor Marine Fuel, Inc. and Ventura Packers, Inc. in support of the proposal by the Ventura Shell Fish Group (VSG) to create a permit application to permit 2,000 acres of near shore waters off the Ventura Coast.

Ventura Harbor Boatyard, Inc., Ventura Harbor Marine Fuel, Inc. and Ventura Packers, Inc. are all maritime related industries with common ownership. Ventura Harbor Boatyard is the largest commercial shipyard between Los Angeles and San Francisco, California, and regularly services and repairs a variety of commercial fishing vessels. Ventura Harbor Marine Fuel is a commercial fuel facility, supplying petroleum products including EPA red diesel as well as fishing gear to commercial fishing vessels home ported up and down the Pacific Coast. Ventura Packers is a wet fish unloading facility and is responsible for helping Ventura Harbor unload up to one-third of the Pacific Coast catch of pelagic squid.

Pelagic or market squid remains California's largest and most lucrative commercial fishery. The Ventura Harbor is home port for about 50 purse seiners and related light boats. In recent years, commercial fishing in the Ventura Harbor contributed $46 million in economic activity and the equivalent of 378 full-time jobs. The development of a new sustainable fishing stock would be beneficial to both the Port District as well as many individuals in the shellfish industry. This type of project would promote stewardship of marine resources, create sustainable economic development to the Ventura Port District, and offset demand for imported seafood with safe and transparently regulated domestic seafood.

We understand that the current cost to undertake the environmental and regulatory steps to obtaining aquaculture permits in California is cost prohibitive for independent fish companies. An approach to pre-permit and then sublease permitted shellfish culture

1415 Spinnaker Drive • Ventura, California 93001-4339 • (805) 654-1433 • FAX (805) 654-8066
Web Site: www.vhby.com

grounds has the potential to dramatically increase the number of shellfish farms in the State.

The proposal submitted by VSG offers a unique approach to the advancement of bivalve shellfish culture with real and tangible benefits to domestic seafood supply, food security and the strengthening or working waterfronts through product diversification and expanded employment. We encourage NOAA and the National Sea Grant office to support this endeavor.

Please advise if there is anything additionally we can do to support this effort.

Very truly yours,

VENTURA HARBOR BOATYARD, INC.
VENTURA HARBOR MARINE FUEL, INC.
VENTURA PACKERS, INC.

ROBERT A. BARTOSH
President

RAB/dbe

April 19, 2015

NOAA Sea Grant
Aquaculture Program Manager
1315 East-West Highway, R/SG
SSMC3, Rm 11876
Silver Spring, MD 20910

Re: Support for Ventura Shellfish Group Proposal for Offshore Shellfish Culture

To Whom It May Concern:

I am pleased to write in support of the proposal by the Ventura Shellfish Group (VSG) to create a permit application to pre-permit 2,000 acres of nearshore waters for shellfish culture off the coast of Ventura California. This is a very exciting project and well aligned with NOAA's National Shellfish Initiative.

Permitting new sites is the biggest impediment to growing aquaculture in the country. The cost to undertake the environmental and regulatory permitting in California and in most states is prohibitive and a major deterrent to growth and in particular new entrants to the industry. This approach to pre-permit, and then sub-lease permitted shellfish culture grounds has the potential to dramatically increase the number of shellfish farms in the state. A collaborative effort such as is being put forward by VSG to pre-permit acres for offshore shellfish culture is innovative and on a scale that would establish California as a major contributor of cultured seafood products. It aligns well with the primary goal of NOAA and the National Sea Grant Program to have "a safe and sustainable supply of seafood to meet public demand, and will also contribute to having "informed consumers who understand the health benefits of seafood consumption."

Demand for cultured shellfish both domestically and abroad is very strong. Taylor Shellfish is currently investing millions of dollars to expand our shellfish seed production facilities, particularly in Humboldt Bay, to meet the growing demands. Permitted sites to grow out this seed is an on-going challenge. We are excited about the potential of another 2,000 acres of permitted culture opportunity both from a standpoint of being a potential tenant and/or for selling seed to other tenants. As a leading producer of cultured shellfish in the country, should the project be funded we'd be a willing participant in an education workshop.

In addition to the benefits already mentioned the VSG proposal also preserves a valuable working waterfront at the Port of Ventura through product diversification and expanded employment. I encourage NOAA and the National Sea Grant Office to support this endeavor.

Sincerely,

Bill Dewey

Bill Dewey
Director of Public Policy & Communications

ATTACHMENT 2

PACKERS OF:
OCEAN ANGEL

TELEPHONE: (831) 763-3000
FAX: (831) 763-2444

DEL MAR SEAFOODS, INC. 331 Ford Street Watsonville, CA 95076

Processors and Distributors of Monterey Bay Squid

April 16, 2015

NOAA Sea Grant
Aquaculture Program Manager
1315 East-West Highway, R/SG
SSMC3, Rm 11876
Silver Spring, MD 20910

RE: NOAA Sea Grant Aquaculture Extension and Technology Transfer 2015

To Whom This May Concern,

Del Mar Seafood is in support of the proposal by the Shellfish Group to create a permit application to pre-permit 2,000 acres of near shore waters off the Ventura coast.

We have been in operation since 1962.We are a fully integrated company that owns and operates fishing vessels and processing facilities in California and Oregon. We off-load over 30,000 tons of fish a year of which 20,000 tons are unloaded in Ventura.

The Ventura Harbor offers essential off-loading facilities in the region with a commercial fish dock (115'x200'), a commercial fisheries commerce building (7,700 sq.ft.) and other amenities such as a marina, two commercial fuel docks and a boatyard that are essential to the commercial fishing fleet in the harbor.

This type of opportunity in the region would promote stewardship of marine resources and improve the economic viability of this working harbor. The cost to undertake the environmental and regulatory permitting in California is prohibitive and this approval to pre-permit and then sublease permitted shellfish culture grounds has the potential to increase the number of commercial fish companies to take advantage of this opportunity to increase the number of shellfish farms in the state.

I encourage NOAA and the National Sea Grant Office to support this endeavor.

Sincerely,

Joe Roggio
Chief Financial Officer

ATTACHMENT 2

UNIVERSITY OF CALIFORNIA, SANTA BARBARA

BERKELEY • DAVIS • IRVINE • LOS ANGELES • RIVERSIDE • SAN DIEGO • SAN FRANCISCO

SANTA BARBARA • SANTA CRUZ

MARINE SCIENCE INSTITUTE
PHONE: (805) 893-5175
FAX: (805) 893-8062
E-MAIL: lester@msi.ucsb.edu

SANTA BARBARA, CALIFORNIA 93106-9610

April 14, 2015

To whom it may concern:

I wanted to express my support for the Ventura Shellfish Group (VSG)'s proposal to create a permit application to pre-permit 2,000 acres of nearshore waters off the coast of Ventura, California for mussel farming. The proposal is right in line with the primary goal of NOAA and the National Sea Grant Program to have "a safe and sustainable supply of seafood to meet public demand, and will also contribute to having "informed consumers who understand the health benefits of seafood consumption." The proposed project would centralize the tasks of permitting and environmental analysis and monitoring for a multi-stakeholder platform and reduce the barriers to participation in sustainable domestic seafood production. Such a project would promote stewardship of marine resources, create sustainable economic development to the Ventura Port District, and offset demand for imported seafood with safe and transparently regulated domestic seafood. The cost to undertake the environmental and regulatory permitting in California is prohibitive and this approach to pre-permit, and then sub-lease permitted shellfish culture grounds, has the potential to dramatically increase the number of shellfish farms in the state.

I am the Principal Investigator on a Sea Grant funded project, concluding at the end of this month, entitled *Maximizing the Value of Offshore Aquaculture Development in the Context of Multiple Ocean Uses*. I and my project team are committed to participating in a workshop for the education and outreach component of the VSG project, and to providing technical guidance for the siting aspect of VSG's strategic plan. The technical guidance will be based on our results for the modeling we did for the entire Southern California Bight (described below), although we can also do additional model runs for the Ventura region with parameter adjustments if time and funding allow.

The goal of our project was to develop a framework to inform marine spatial planning for offshore or open ocean aquaculture such that the value and success of aquaculture development is optimized in the context of a suite of ocean uses and environmental impacts. Specifically, we have assessed the range of potential conflicts and environmental impacts associated with the development of open ocean aquaculture for the Southern California Bight and have developed spatial bioeconomic models and tradeoff analysis to examine aquaculture development and other ocean uses and benefits. We identified spatial constraints to aquaculture development (e.g., shipping lanes, certain habitat types, depth constraints), compiling the best available data layers to represent these constraints and then determining what areas are potentially suitable for aquaculture development. We then simulated different types of open ocean aquaculture development (shellfish, kelp, and finfish), while also modeling key existing uses that may conflict with aquaculture (e.g., fisheries) and impacts from aquaculture (e.g., altered viewshed,

environmental impacts, disease risk). We then conducted a tradeoff analysis to quantitatively examine interactions among the three types of offshore aquaculture development and other existing uses, benefits and impacts (e.g., commercial and recreational fisheries, attractive viewshed, environmental impacts, disease risk). We used dynamic optimization to help identify siting plans that minimize tradeoffs, balance diverse objectives, and reduce potential environmental impacts.

We hope that our research will facilitate the development of offshore aquaculture in California, and are excited to have the opportunity to apply our project results to such a concrete development project. The Ventura Shellfish Group's proposal is a unique approach to the advancement of bivalve shellfish culture and I encourage NOAA and the National Sea Grant Office to support this endeavor.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Sarah E. Lester, PhD
Researcher and Program Manager
Sustainable Fisheries Group
Marine Science Institute / Bren School of Environmental Science & Management

ATTACHMENT 2

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
650 Capitol Mall, Suite 5-100
Sacramento, CA 95814-4700

April 17, 2015

National Sea Grant Office
Program Director for Aquaculture
NOAA, U.S. Department of Commerce
1315 East-West Highway, R/SG
SSMC3, Rm 11805
Silver Spring, MD 20910

Dear Program Director:

I am writing this letter in support of the proposal submitted by Paul Olin entitled ***Ventura Shellfish Enterprise – Strategic Permitting Initiative to Significantly Increase Shellfish Farming in Southern California***. This proposal works to build environmental and regulatory confidence towards developing an expanded shellfish aquaculture industry in southern California. The work proposed supports the goals of the NOAA Fisheries Office of Aquaculture and also meets identified needs regarding development of shellfish and offshore aquaculture in the West Coast Region and more specifically, in southern California. The proposed project is responsive to NOAA's National Shellfish Initiative as well. The proposed project aligns well with other shellfish aquaculture permitting strategies in WA, OR and northern California in terms of a regionally-specific collective permitting approach. This proposal will make a significant contribution to innovative shellfish permitting approaches that can serve as a model for other geographic areas. It also contributes to the goals and objectives of the California Shellfish Initiative, which I am actively engaged in, along with my CA State Department of Fish and Wildlife counterpart, State Aquaculture Coordinator Randy Lovell. Together, we strive to achieve federal, state, and local regulatory agency coordination regarding permitting shellfish aquaculture in California.

This proposal also aligns with my responsibilities as NOAA's West Coast Regional Aquaculture Coordinator for California and I am pleased to be a Co-Principle Investigator for the project, and work closely with Paul Olin and the co-PIs – I therefore offer my support for this project. Specifically, I will provide support for organizing and executing meetings, data mining to assist with environmental review, assisting in translating the best available science for policy and management decision-making, bring additional science assets to contribute to understanding and utilizing the science, and contributing to, and reviewing written documents related to this project. My assistance with the day to day planning and management of meeting content, arranging meeting venues, conducting various types of outreach throughout the project execution including social media, newsletters, emails and meeting notes, as well as contributing to populating various webpages including NOAA Fisheries Office of Aquaculture's

homepage and the West Coast Region's aquaculture webpage will be a significant contribution to this work. This project will serve a critical case study not just for California, but also as a necessary step in the effort to advance our nation's pursuit of a sustainable shellfish aquaculture industry.

Please feel free to contact me with any questions at (916) 930-3619.

Sincerely,

Diane Windham
Regional Aquaculture Coordinator - California
NOAA Fisheries
West Coast Region

ATTACHMENT 2

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Aquaculture Program
830 S Street
Sacramento, CA 95814
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

16 April 2015

NOAA Sea Grant
Aquaculture Program Director
1315 East-West Highway, R/SG
SSMC3, Rm 11876
Silver Spring MD 20910

Subject: Support for proposed SeaGrant Extenstion/Tech Transfer project, "Ventura Shellfish Enterprise – Strategic Permitting Initiative to Significantly Increase Shellfish Farming in Southern California"

To Whom It May Concern,

I am writing to express support for and encourage funding of the 2015 National Sea Grant Extension and Technology Transfer proposal submitted by Dr. Paul Olin and the Ventura Shellfish Group focused on an innovative and strategic approach to permitting shellfish leases in Southern California. I am pleased to be included as a Co-Principal Investigator on this proposal, and consider it central to my duties as State Aquaculture Coordinator (FGCode §15100*) to assist in this innovative, collective-permitting approach.

California faces a severe shortfall of local shellfish production compared to demand, and efforts are underway through the California Shellfish Initiative to recognize and extend leases on additional shellfish growing grounds, and work toward improving the regulatory and permitting efficiency associated with expanding shellfish culture.

In partnership with my federal counterpart, Diane Windham, and Dr.Olin, we will, together, coordinate the many local, state, and federal agencies having regulatory oversight for such projects to provide a more collaborative and simultaneous process of environmental review. This proposal will address a long-standing need for aquaculture development policy discussions and improvements in process with regard to project applicants and reviewers. Given the substantial and unique challenges of that effort in California, I believe that the approach being taken by this group is to be applauded.

Please consider this proposal positively, and fund its important work.

Sincerely,

Randy Lovell
State Aquaculture Coordinator
CA Department of Fish and Wildlife

*Fish & Game Code §15100 - **Duties of Aquaculture Coordinator**
There is within the department an aquaculture coordinator who shall perform all of the following duties:
(a) Promote understanding of aquaculture among public agencies and the general public.
(b) Propose methods of reducing the negative impact of public regulation at all levels of government on the aquaculture industry.
(c) Provide information on all aspects of regulatory compliance to the various sectors of the aquaculture industry.
(d) Provide such advice to aquaculturists on project siting and facility design that may be needed to comply with regulatory requirements.

ATTACHMENT 2

Bernard Friedman
Santa Barbara Mariculture Co.
4365 Cuna Dr.
Santa Barbara, CA 93110

NOAA Sea Grant
Aquaculture Program Manager
1315 East-West Highway, R/SG
SSMC3, Rm 11876
Silver Spring, MD 20910

April 15, 2015

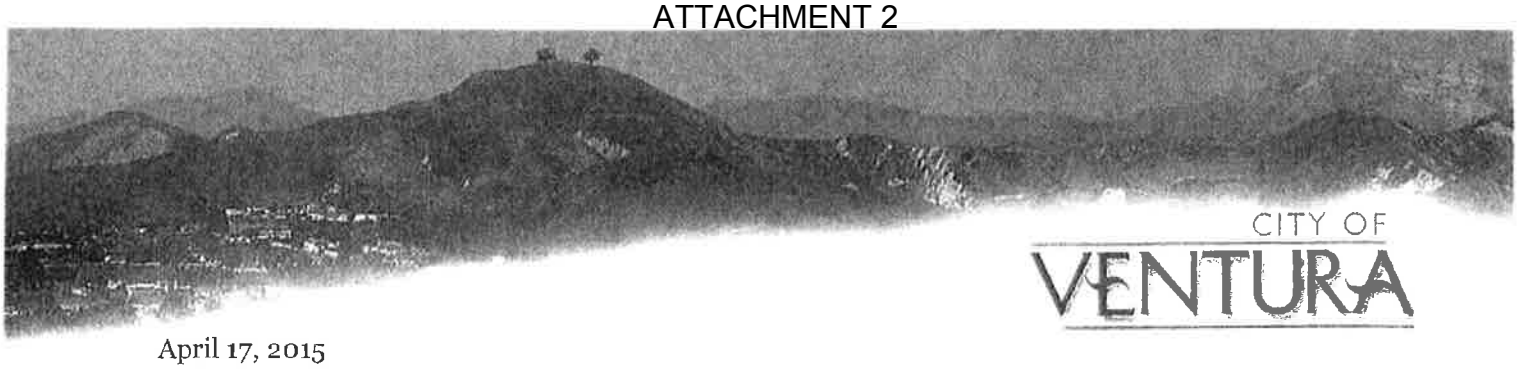
The proposal by the Ventura Shellfish Group (VSG) to create a permit application to pre-permit 2,000 acres of nearshore waters off the coast of Ventura California for mussel farming is right in line with the primary goal of NOAA and the National Sea Grant Program to have "a safe and sustainable supply of seafood to meet public demand, and will also contribute to having "informed consumers who understand the health benefits of seafood consumption." The proposed project would centralize the tasks of permitting and environmental analysis and monitoring for a multi-stakeholder platform and reduce the barriers to participation in sustainable domestic seafood production. Such a project would promote stewardship of marine resources, create sustainable economic development to the Ventura Port District, and offset demand for imported seafood with safe and transparently regulated domestic seafood. The cost to undertake the environmental and regulatory permitting in California is prohibitive and this approach to pre-permit, and then sub-lease permitted shellfish culture grounds has the potential to dramatically increase the number of shellfish farms in the state.

The Ventura Shellfish Group's proposal is a unique approach to the advancement of bivalve shellfish culture with real and tangible benefits to domestic seafood supply, food security, and the strengthening or working waterfronts through product diversification and expanded employment. I encourage NOAA and the National Sea Grant Office to support this endeavor.

Sincerely,

Bernard Friedman
President
Santa Barbara Mariculture Co.

ATTACHMENT 2



CITY OF VENTURA

April 17, 2015

NOAA Sea Grant
Aquaculture Program Manager
1315 East-West Highway, R/SG
SSMC3, Rm 11876
Silver Spring, MD 20910

Dear Sir or Madam:

I write on behalf of the City of San Buenaventura in support of the proposal by the Ventura Shellfish Group (VSG) to create the permit applications necessary to pre-permit 2,000 acres of nearshore waters off our coast for shellfish cultivation. Our city is proud of our harbor, which is home to a commercial fishing fleet that is mandated by the California Coastal Commission as the priority land use in the southwest Harbor Area. Based on the most recent economic analyses, commercial fishing in Ventura Harbor contributes $46 million in economic activity and the equivalent of 378 full-time jobs to the local economy (*The Economic Impact of Ventura Harbor on the Ventura County and National Economies,* The California Economic Forecast, Final Report, July 2012). In the last several years, the annual catch landed at the harbor has declined as squid stocks have migrated north seeking cooler waters. It is therefore vital for our Port District to identify new fishing stocks. A sustainable commercial mussel operation is right in line with the primary goal of NOAA and the National Sea Grant Program to have "a safe and sustainable supply of seafood to meet public demand," and will also contribute to having "informed consumers who understand the health benefits of seafood consumption."

The City of San Buenaventura and our county take pride in being home to sustainable farming operations, innovative businesses, and vibrant commercial centers. Our city and business community face increasing challenges---a sustained drought, loss of agriculture land, reduced commercial fishing stocks, just to name a few. The VSG proposal provides a unique approach to address all three of these major challenges. The VSG shellfish aquaculture project will allow us to expand our agricultural footprint, provide high quality food with a minimal commitment of fresh water, and continue to support a vital economic element of our city--our commercial fishing operations.

We recognize that this commercial enterprise must be sustainable and address all of the appropriate concerns identified through the environmental permitting process. Our Port District has a solid track record of properly securing all environmental entitlements for its major commercial undertakings, which include attracting sustainable projects to the harbor. Given their track record, our City sees great promise in this commercial shellfish project. The VSG

proposal offers a unique approach to the advancement of bivalve shellfish culture with real and tangible benefits to domestic seafood supply, food security, and the strengthening of working waterfronts through product diversification and expanded employment. I strongly encourage NOAA and the National Sea Grant Office to support this endeavor.

Sincerely,

Cheryl Heitmann
Mayor

ATTACHMENT 2

HOG
SLAND
YSTER
CO.
APA
ARSHALL
AN FRANCISCO

NOAA Sea Grant
Aquaculture Program Manager
1315 East-West Highway, R/SG
SSMC3, Rm 11876
Silver Spring, MD 20910

April 23, 2015

To Whom it may concern:

The proposal by the Ventura Shellfish Group (VSG) to create a permit application to pre-permit 2,000 acres of nearshore waters off the coast of Ventura California for mussel farming is right in line with the primary goal of NOAA and the National Sea Grant Program to have "a safe and sustainable supply of seafood to meet public demand, and will also contribute to having "informed consumers who understand the health benefits of seafood consumption." The proposed project would centralize the tasks of permitting and environmental analysis and monitoring for a multi-stakeholder platform and reduce the barriers to participation in sustainable domestic seafood production. Such a project would promote stewardship of marine resources, create sustainable economic development to the Ventura Port District, and offset demand for imported seafood with safe and transparently regulated domestic seafood. The cost to undertake the environmental and regulatory permitting in California is prohibitive and this approach to pre-permit, and then sub-lease permitted shellfish culture grounds has the potential to dramatically increase the number of shellfish farms in the state.

Our company was founded over 32 years ago. We raise oysters, clams and mussels, and also have two shellfish centric restaurants. In the entire history of our company, we have never met demand, and regularly import additional shellfish from other states. We are very interested in pursuing additional growing areas within the state. In addition to growing shellfish in Tomales Bay, we also have a robust retail, educational and visitor serving business at the site of our processing facility. We believe that the Ventura Shellfish Group proposal is well situated to take advantage of the same synergies.

The Ventura Shellfish Group's proposal is a unique approach to the advancement of bivalve shellfish culture with real and tangible benefits to domestic seafood supply, food security, and the strengthening or working waterfronts through product diversification and expanded employment. I encourage NOAA and the National Sea Grant Office to support this endeavor.

Sincerely,

20215 SHORELINE HWY PO BOX 829 MARSHALL, CA 94940 PHONE 415 663 9218 FAX 415 663 9246

ANDRIA'S SEAFOOD
est. 1982
RESTAURANT & MARKET

April 20, 2015

NOAA Sea Grant
Aquaculture Program Manager
1315 East-West Highway, R/SG
SSMC3, Rm 11876
Silver Spring, MD 20910

RE: NOAA Sea Grant Aquaculture Extension and Technology Transfer 2015

To Whom This May Concern,

I have been advised by the Ventura Port District that an effort is being made by the Ventura Shellfish Group to create a permit application to pre-permit 2000 acres of nearshore waters off the coast of Ventura for mussel farming. I am in support of this proposal.

Andria's Seafood has been in the fish business since 1974, as a seafood processor and retailer, and since 1982 as a restaurant and retailer in Ventura Harbor. As a processor in the 1980's, I was involved with the California Seafood Council when they studied customer preferences toward local products. The study proved conclusively that customers prefer local products, even with higher price points, as local meant fresher.

This proposal offers a unique approach to the advancement of bivalve shellfish culture with real and tangible benefits to seafood operators like Andria's Seafood. The Ventura Harbor has a strong heritage of commercial fishing in the region and this would strengthen our commercial fisheries through diversification and expanded employment. I encourage NOAA and the National Sea Grant Office to support this endeavor.

Sincerely,

Michael J. Wagner

Michael Wagner
Andria's Seafood Restaurant and Market
1449 Spinnaker Drive, Ste. A
Ventura, CA 93001

ATTACHMENT 2

April 21, 2015

NOAA Sea Grant
Aquaculture Program Manager
1315 East-West Highway, R/SG
SSMC3, Rm 11876
Silver Spring, MD 20910

Dear Sir or Madam:

I am writing to express the Ventura Port District's support of the Ventura Shellfish Enterprise, a collaborative effort among seasoned regulatory, commercial and technical experts to define how best to secure environmental entitlements - and prepare the requisite permit applications and CEQA review - for a sustainable commercial mussel operation in state waters of the Santa Barbara Channel. The Ventura Port District is a special district formed under the California Harbors and Navigation Code and is responsible for operating a 274-acre commercial fishing and recreational harbor. We provide 130 commercial fishing slips, 200 linear feet of commercial dock space and a 7,700-square foot multi-use commercial fishing warehouse. Our facilities include a high speed transfer and storage facility, a dedicated commercial fuel dock with high speed fuel pumping capacity and two commercial boat yards that service fishing fleets which come to us for professional refits from home ports as far away as Alaska – a testament to the expertise of our local professional boatwrights. These commercial fishing operations are in our southwest harbor, as mandated by entitlements issued to the Ventura Port District by the California Coastal Commission. When operational, we are expecting to produce 12 million pounds of high-grade commercial product with generated by 40-60 commercial fishermen, and twice that many jobs associated with processing and logistics. This project at completion will increase commercial mussel production in California by a factor of 75.

The proposed commercial mussel operation – twenty 100-acre parcels to be located proximate to the harbor in areas deemed suitable by the appropriate regulatory agencies – would be pre-permitted and managed by the Port District. This approach, which is consistent with that being pursued by Humboldt Bay Harbor, Recreation and Conservation District, enables smaller commercial fisherman to enter the market—operators who ordinarily would be shut out by the substantial costs and complexity of permitting and monitoring offshore mariculture. It will also enable these operators to tap into a pool of expertise and realize economies of scale in all aspects of bringing the product to market, from seed stock development to product quality assurance. We are expert in leasing property to commercial

Ventura Port District
1603 Anchors Way Drive, Ventura, CA 93001-4229
805/642-8538 • FAX 805/658-2249
www.venturaharbor.com

fishing companies, as we have done this for over 50 years using both short-term and long-term leases with our tenants.

Based on recent economic analyses, commercial fishing in Ventura harbor contributes $46 million in economic activity and the equivalent of 378 full time jobs to the local economy (*The Economic Impact of Ventura Harbor on the Ventura County and National Economies,* The California Economic Forecast, Final Report, July 2012). In the last several years the annual catch landed at the harbor has declined as squid stocks have migrated north seeking cooler waters. Simply put: our commercial operations are under-utilized. We look to a commercial mussel operation to use this additional capacity, and note that a sustainable commercial mussel operation is right in line with the primary goal of NOAA and the National Sea Grant Program to have "a safe and sustainable supply of seafood to meet public demand," and will also contribute to having "informed consumers who understand the health benefits of seafood consumption."

We recognize that this commercial enterprise must be sustainable and address all of the appropriate concerns identified through the environmental permitting process. The Ventura Port District has a solid track record of properly securing all environmental entitlements for our major commercial undertakings, which include attracting sustainable projects to the harbor. We fully comply with all of our requisite permits and monitoring conditions. We enjoy professional relationships with the US Army Corps of Engineers, California Coastal Commission, Regional Water Quality Control Board, California Department of Fish & Wildlife, and are home to the Channel Islands National Park. Given our superior infrastructure for commercial fishing, our performance securing environmental entitlements for large projects, and unique relationships with federal and state agencies, we see great promise in this commercial shellfish project. The Ventura Shellfish Enterprise offers a unique approach to the advancement of bivalve shellfish culture with real and tangible benefits to domestic seafood supply, food security, and the strengthening of working waterfronts through product diversification and expanded employment. I strongly encourage NOAA and the National Sea Grant Office to support this endeavor.

Sincerely,

Jim Friedman, Chair
Board of Port Commissioners
Ventura Port District