



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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March 10, 2026

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HUMBOLDT BAY OYSTER COMPANY SHELLFISH FARM PROJECT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION SCH # 2026020306

Dear Mrs. Blodgett,

The California Department of Fish and Wildlife (Department) received an Initial Study/Mitigated Negative Declaration (IS/MND) from the Humboldt Bay Harbor, Recreation and Conservation District (Harbor District) for the Humboldt Bay Oyster Company Shellfish Farm Project (Project), pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹ Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that the Department, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

DEPARTMENT ROLE

The Department is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the state (Fish & G. Code section 711.7, subd. (a) and section 1802; Pub. Resources Code section 21070; CEQA Guidelines section 15386, subd. (a)). The Department, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., section 1802). The Department is also responsible for marine biodiversity protection under the Marine Life Protection Act in coastal marine waters of California and ensuring fisheries are sustainably managed under the Marine Life Management

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Act. The Department has the additional role of working toward the objectives of state policy declared in Fish & G. Code section 1700, which includes, among others, the development of commercial aquaculture.

PROJECT DESCRIPTION SUMMARY

Proponent: Humboldt Bay Harbor, Recreation and Conservation District (Harbor District)

Objective: Primary Project objective is to receive approval to continue culturing Pacific oysters (*Crassostrea gigas*), Kumamoto oysters (*Magallana sikamea*), and Manila clams (*Venerupis philippinarum*) using the current Floating Upweller System Culture (FLUPSY), raft culture, and rack and bag culture methods in existing culture areas in Humboldt Bay. In addition, expanding rack & bag culture and/or longline culture methods are proposed within 2 expansion areas. Proposed Expansion Area 1 (3.1 acres) and Expansion Area 2 (10.8 acres) would add a total of 13.9 acres of intertidal culture, increasing the total cumulative area to 31.7 acres.

Location: The Project is in Humboldt Bay, at 3 sites: (1) the FLUPSY is located at Woodley Island Marina, (2) the raft culture is in the Mad River Slough, north of the slough bridge in North Arcata Bay, and (3) the rack and bag culture is in the Mad River Slough Channel, south of the slough bridge in North Arcata Bay. The proposed expansion areas are immediately adjacent to the existing rack-and-bag culture in the Mad River Slough Channel.

Timeframe: Not specified

BIOLOGICAL SIGNIFICANCE

Humboldt Bay is California's second largest bay, and the largest estuary on the Pacific coast between San Francisco Bay and Oregon's Coos Bay. Its marine and estuarine habitats provide refuge and nursery habitat for more than 300 fish and invertebrate species, many with important associated commercial and recreational fisheries value. Notably, Humboldt Bay contains approximately 31–37% of the state's mapped eelgrass, highlighting its significance within California's coastal habitats (Merkel & Associates 2017, CDFW Marine Bios). It is also internationally recognized for its importance to overwintering and migratory shorebirds (Colwell 1994; Hickey et al. 2003; Page et al. 2003), supporting up to 100,000 birds seasonally and designated both an Important Bird Area by the Audubon Society and an International Site within the Western Hemisphere Shorebird Reserve Network (Schlosser and Eicher 2012). At least 24 shorebird species utilize the mudflats for feeding, resting, and roosting (Danufsky and Colwell 2003; Dodd and Colwell 1998; Evans and Harris 1994; Long and Ralph 2001), and approximately two-thirds of these species are identified as shorebirds of conservation concern or are included on the U.S. Fish and Wildlife Service's Birds of Conservation Concern list (USFWS 2008; U.S. Shorebird Conservation Plan Partnership 2015).

SPECIAL STATUS SPECIES

Numerous species listed under the California Endangered Species Act (CESA) and/or Federal Endangered Species Act (ESA) and species designated as Sensitive Natural Communities (SNC) or California Species of Special Concern (SSC), occur within or adjacent to the Project area and may be subject to direct and indirect Project impacts. These include:

- Coastal cutthroat trout (*Oncorhynchus clarki clarki*), state SSC;
- Coho salmon (*Oncorhynchus kisutch*), state and federally threatened (Southern Oregon/Northern California Evolutionarily Significant Unit (ESU));
- Green sturgeon (*Acipenser medirostris*), federally threatened (southern DPS), state SSC (northern and southern DPS);
- Longfin smelt (*Spirinchus thaleichthys*), state-threatened;
- Pacific lamprey (*Entosphenus tridentatus*), state SSC;
- Steelhead (*Oncorhynchus mykiss*), federally threatened (Northern California Distinct Population Segment (DPS)), state-endangered candidate (Northern California Summer Steelhead);
- Western river lamprey (*Lampetra ayresii*), state SSC;
- White sturgeon (*Acipenser transmontanus*), state SSC and state-threatened candidate;
- Black brant (*Branta bernicla nigricans*), state SSC;
- Native eelgrass (*Zostera marina*), State-ranked (S3) SNC

In addition, several species with commercial, recreational, and cultural importance also exist within and adjacent to the proposed Project area and could be impacted by Project activities, including:

- Dungeness crab (*Cancer magister*);
- Pacific herring (*Clupea pallasii*);
- Northern anchovy (*Engraulis mordax*);
- Rockfish (*Sebastes* sp.);
- California halibut (*Paralichthys californicus*);
- Bat rays (*Myliobatis californica*); and
- Leopard sharks (*Triakis semifasciata*).

COMMENTS AND RECOMMENDATIONS

The Department offers the comments and recommendations below to assist the Harbor District in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife resources.

Native Eelgrass Beds

General Comments: Native eelgrass (*Z. marina*) plays a vital role in Humboldt Bay and is recognized by state and federal regulations as a highly valuable and sensitive habitat. It contributes to primary production, nutrient cycling, and provides essential spawning, foraging, and nursery habitats for numerous fish and invertebrate species. Protections exist under state and federal “no-net-loss” policies for wetland habitats, emphasizing its conservation priority (California Eelgrass Mitigation Policy (CEMP), NMFS 2014). In California, eelgrass habitats are listed as Sensitive Natural Communities with a vulnerable *State Rank S3*, indicating their limited distribution and susceptibility to environmental impacts, which must be addressed during CEQA reviews (California Sensitive Natural Communities List, 2026). The importance of eelgrass protection and restoration, as well as the ecological benefits of eelgrass, are also identified in the California Public Resources Code (PRC section 35630).

Under the federal Magnuson-Stevens Fishery Conservation and Management Act, eelgrass is designated as Essential Fish Habitat (EFH) for various federally managed species within the Pacific Coast Groundfish and Pacific Coast Salmon Fishery Management Plans. It is also classified by NOAA Fisheries as a Habitat Area of Particular Concern (HAPC) due to its ecological importance. Its designation as EFH and HAPC underscores its critical role in supporting thriving marine ecosystems in Humboldt Bay, providing essential services that sustain both biodiversity and fisheries. Given its ecological value, eelgrass habitat remains a high-priority focus for conservation management in Humboldt Bay.

Eelgrass habitat occurs within the Project site in both proposed expansion areas. The Department is concerned with potential direct and indirect effects to eelgrass due to proposed expansion activities, which will add 13.9 acres of culture area within or near to native eelgrass beds. To ensure no net loss of eelgrass habitat within the Project area, the Department offers the following comments and recommends the following mitigation measures:

Eelgrass Comment 1 - Surveys: The IS/MND (Bio-A4) states that eelgrass surveys will be conducted during the growing season (May through September) prior to the installation of any new gear and does not propose to conduct post-installation eelgrass monitoring or mitigation. Following the CEMP guidelines, pre-installation eelgrass surveys should be completed within 60 days of gear installation and post-installation surveys should be completed within 30 days of completion (NOAA, 2014). Additionally, the IS/MND does not provide any information regarding the proposed methods to conduct eelgrass surveys.

Recommendations: The Department recommends the Final IS/MND include details on pre- and post-installation eelgrass surveys. Surveys should include reference sites that can be used to account for natural fluctuations in eelgrass distribution and should be conducted by a qualified biologist following the standards of the CEMP. If unexpected impacts to eelgrass occur, mitigation should be required for such impacts following the standards of the CEMP.

If eelgrass harvest and transplanting is required for mitigation, a Scientific Collecting Permit (SCP) from the Department will be required prior to harvest and transplanting activities. The SCP may include permit conditions such as donor eelgrass surveys, submittal of an eelgrass harvest and transplant plan, limits on number of turions collected, methods for collection and transplanting, notification of activities, and reporting requirements. Please visit the Department SCP webpage for more information: <https://wildlife.ca.gov/Licensing/Scientific-Collecting>

Eelgrass Comment 2 - Buffers: The Project proposes to avoid impacts to eelgrass habitat when installing new gear or moving old gear by incorporating a 5-meter (m) unvegetated perimeter from existing vegetated eelgrass cover (Mitigation Measure 1). A map of current existing eelgrass beds (Figure 14) provided in the IS/MND shows dense eelgrass cover within Expansion Area 1, and patchy eelgrass distribution in Expansion Area 2. The 5-m perimeter recommended in the CEMP is considered an extension of potential eelgrass habitat, allowing for natural interannual fluctuations in spatial distribution, and is not considered a “buffer” from eelgrass habitat. Previous aquaculture projects in Humboldt North Bay have included at least a 10-foot buffer between eelgrass and culture gear in addition to the 5-m perimeter. The Intertidal Pre-Permitting Project proposed to include a 30-foot buffer (5-m unvegetated perimeter plus a 15-foot buffer) to avoid impacts to eelgrass habitat and the Coast Seafoods Expansion Project included a 25-foot buffer between rack-and bag culture and eelgrass beds.

Recommendations: To avoid impacts associated with, but not limited to, trampling, shading, and changes in hydrodynamics and sedimentation, the Department recommends that the Final IS/MND be revised to include a buffer where feasible between eelgrass habitat and aquaculture gear in addition to the 5-m unvegetated perimeter. The Department also recommends detailed maps of eelgrass habitat for each culture site are included, that delineate the unvegetated perimeter and buffer.

Eelgrass Comment 3 - Vessel Operations: The IS/MND states that vessels will access the sites by passing over eelgrass at higher tides. However, it also states that oyster harvesting is performed during low tides. The document does not analyze the potential for vessel transit over eelgrass when tidal elevations are insufficient to provide adequate water depth and clearance. In Humboldt Bay, tidal elevations and seasonal water levels vary substantially, and high tides may not consistently coincide with operational demands. Consequently, vessels operating

“at high tide” and/or during oyster harvesting may transit through shallow areas where submerged components, including propellers could contact eelgrass beds reducing shoot density, altering bed structure, and impairing habitat functions that support spawning, refuge, and foraging for numerous species.

Additionally, the IS/MND proposes the use of a second vessel to support activities in the expansion areas in addition to the vessel currently used for operations. Eelgrass is widely distributed within and adjacent to the proposed expansion areas, including along likely access routes. Available survey data indicate that eelgrass distribution in the Bay is dynamic, and modeling studies project continued shoreward expansion of eelgrass into intertidal areas in response to sea level rise. If not carefully managed, vessel operations may constrain this natural landward migration and reduce the resilience of eelgrass habitat over time.

Recommendations: To reduce the potential for vessel-related eelgrass impacts, the Department recommends the Final IS/MND incorporate the following measures: (1) establish and enforce minimum tidal elevation criteria (e.g., a defined water depth buffer above mapped eelgrass canopy height) for vessel transit across eelgrass areas, and (2) designate and GPS-mark specific access corridors that avoid dense eelgrass beds to the maximum extent feasible, based on the most recent eelgrass mapping

Eelgrass Comment 4 - Longline Culture: Longline culture may adversely affect eelgrass where line spacing and gear density limit light availability or alter near-bottom hydrodynamics. Eelgrass is highly sensitive to light reduction and physical disturbance, which can reduce growth, survival, and reproductive output (Orth et al. 2006; Waycott et al. 2009). Closely spaced long lines and associated gear can alter localized sediment patterns and reduce water circulation (Tallis et al. 2009; Skinner et al. 2014; Coston-Guarini et al. 2017). These changes have been shown to reduce eelgrass shoot density, percent cover, biomass, and recruitment where culture density is high or flushing is limited (McKindsey et al. 2011; Skinner et al. 2014; Coston-Guarini et al. 2017; Merkel & Associates 2023).

The IS/MND proposes spacing long lines approximately 3 feet apart. However, more recent studies indicate that increasing spacing and reducing gear density can measurably improve light penetration, maintain water circulation, and support greater eelgrass persistence beneath and adjacent to culture plots (Skinner et al. 2014; McKindsey et al. 2011; Gagnon et al. 2020). In Humboldt Bay, long-term monitoring following culture removal at 2.5-foot line spacing demonstrated rapid and measurable increases in eelgrass cover and density within 1–3 years, providing clear evidence of the capacity of eelgrass to recover and expand once culture pressure is reduced (Merkel & Associates 2023). This suggests that denser longline configurations can suppress eelgrass, and that increasing spacing or reducing gear density can help promote persistence and recovery. Adoption of wider spacing (5 to

10 feet) is consistent with ecosystem-based and precautionary aquaculture management approaches intended to balance shellfish production with protection of submerged aquatic vegetation (McKindsey et al. 2011; Gagnon et al. 2020).

Recommendations: Given the documented sensitivity of eelgrass to light reduction and gear density, the Department recommends that the Harbor District consider increasing line spacing to at least 5 feet, and preferably up to 10 feet where feasible, and reducing overall gear density. Increasing spacing and minimizing gear footprint would reduce cumulative shading and other effects of longline culture methods, support eelgrass recruitment and lateral expansion, and minimize impacts to eelgrass habitat and associated species.

Black Brant, Waterfowl, and Shorebirds

Comments: Black Brant - Black brant occur in Humboldt Bay as spring and fall migrants and winter visitors. The Bay is the fourth most utilized staging area along the Pacific Flyway and has historically been the most important site in California for this species due to the extent and condition of eelgrass habitat. Because brant rely heavily on eelgrass as a food source and adjacent habitats during migration and wintering, reductions in eelgrass extent, quality, or accessibility may adversely affect their foraging efficiency and energetic condition. The IS/MND states that “The HBOC Project will avoid eelgrass” in its Black Brant analysis; however, Figure 14 clearly shows eelgrass present within both proposed expansion areas. The IS/MND also cites Connolly and Colwell (2005) to suggest that oyster longline plots do not reduce bird use. While birds were observed on longline plots in that study, the gear spacing allowed access between lines, and the study did not evaluate denser or more closely spaced configurations. Therefore, it cannot be relied upon to conclude that all long line arrangements avoid impacts to brant or other birds.

Recent monitoring in Humboldt Bay supports the importance of line spacing and impacts on brant. The Coast Seafoods Humboldt Bay Black Brant Report (2024) found that wider spacing, such as 10-foot intervals for double-hung cultch-on-longlines and alternating 9 and 16-foot spacing for basket-on-longlines, improved water circulation, facilitated accumulations of eelgrass wrack, algae (e.g., *Ulva spp.*), and invertebrates, and enhanced brant foraging access compared to 2.5-foot spacing. Narrower spacing restricted movement corridors and reduced foraging efficiency.

Waterfowl - In addition to brant, Humboldt Bay supports large numbers of overwintering and migrating waterfowl that depend on eelgrass beds, intertidal mudflats, and nearby grit sites for feeding, resting, and roosting. Habitat use is closely tied to tidal cycles and seasonal food availability. Aquaculture structures placed across mudflat–eelgrass transition zones may reduce habitat accessibility, fragment foraging areas, and increase energetic costs associated with avoidance

behavior. Because many waterfowl concentrate in limited areas during migration and winter, even localized habitat modification or repeated disturbance may have disproportionate population-level effects.

Shorebirds - Humboldt Bay is internationally recognized for its importance to migratory shorebirds. Recent surveys estimate that more than one million shorebirds representing 52 species use the Bay annually (Colwell et al. 2020), and approximately two-thirds are identified as species of conservation concern. Shorebirds rely on open intertidal mudflats for foraging and roosting. Extensive or densely configured long line arrays may convert open flats into structurally complex areas that are less accessible to species adapted to unobstructed habitats. Many shorebirds avoid areas with dense aquaculture gear. Of particular concern is the Long-billed Curlew, a territorial species known to forage extensively in mudflat areas adjacent to wet storage sites (Mathis et al. 2006). Impacts to eelgrass and mudflats, combined with operational disturbance, may reduce available foraging habitat and the time birds can effectively use these areas.

The Department is concerned that the Project may result in significant impacts to black brant, waterfowl, and shorebirds due to degradation or loss of foraging habitat, including eelgrass, intertidal mudflats, and nearby grit sites, and increased disturbance associated with installation, maintenance, and harvesting activities, consistent with CEQA Guidelines section 15065(a)(1) and (3).

Recommendations: To reduce potential impacts to less than significant, the Department recommends the Final IS/MND include avoidance, minimization, and mitigation measures, including, but not limited to:

- Seasonal Timing Restrictions: Limit high-disturbance activities (gear installation, removal, and major maintenance) to the seasonal low-use window for brant, waterfowl, and shorebirds, generally mid-May through June in Humboldt Bay.
- Operational Practices: Minimize vessel speeds in high-use areas, consolidate maintenance trips, and conduct operations during mid-tide periods where feasible to avoid peak low tides (shorebird foraging) and peak high tides (brant and waterfowl use of eelgrass beds).
- Longline Configuration: Avoid continuous, densely configured gear arrays that fragment eelgrass or mudflat habitat. Increase spacing between longlines to at least 5 feet, and preferably up to 10 feet where feasible, and reduce overall gear density to maintain open movement corridors and reduce habitat obstruction.

Green Sturgeon

Comments: The IS/MND states that observations by the National Marine Fisheries Service and the U.S. Fish and Wildlife Service during a 2016 field visit confirmed that green sturgeon feeding did not extend into the Mad River Slough area. The Department previously submitted comments to the Harbor District regarding similar

statements in the Hog Island Oyster Company Shellfish Farm in Arcata Bay Recirculated Initial Study/Mitigated Negative Declaration (SCH# 2021020128), dated April 12, 2021. As stated in our prior comment letter, this conclusion is not substantially supported by evidence in the record. Accordingly, the Department reiterates the comment provided in its April 12, 2021, correspondence regarding this issue:

“The IS/MND inaccurately states that observations by the National Marine Fisheries Service and U.S. Fish and Wildlife Service during a field visit in 2016 confirmed green sturgeon feeding did not extend into the Mad River Slough area. However, aside from Sand Island, the Mad River Slough area had the most activity on the acoustic receiver during the 2016 field visit, but due to equipment difficulties, this location was not fully surveyed (Goldsworthy, pers. comm., 2021). The 2016 field visit also confirms that green sturgeon frequents the higher elevation areas of the intertidal zone to feed (Goldsworthy et al. 2016). In 2007-2008, approximately 200 sturgeon detections were recorded near the Mad River Slough area and breaching in this area has been repeatedly observed (Goldsworthy, pers. comm, 2021). Previous intertidal longline operations, including the Coast Seafoods Expansion Project, implemented a 10-foot buffer between culture plots and subtidal channels to minimize risks to sturgeon and other species foraging on intertidal mudflats.”

Recommendations: To reduce impacts on green sturgeon, the Department continues to recommend a buffer distance of at least 10 feet between culture gear and subtidal channels. This buffer would also provide benefits to eelgrass and other fish species, foraging along the subtidal and mudflat interface.

Pacific Herring

Comments: The IS/MND does not address potential impacts to Pacific herring or describe monitoring measures to protect spawning activity within the Project area. Humboldt Bay supports spawning Pacific herring, which deposit eggs on eelgrass and other substrates, including aquaculture gear. Spawning typically occurs between December and March, with peak spawning activity most often occurring in January and February, and may overlap with planting, harvesting, or maintenance activities.

The Department has established a herring egg monitoring and consultation framework for aquaculture operations in Humboldt Bay. This framework provides clear procedures for detecting spawn, coordinating with the Department, and avoiding impacts to eggs during active spawning periods. Similar measures are not described in the IS/MND and should be incorporated to ensure consistency with existing management practices in Humboldt Bay.

Recommendations: The Final IS/MND should include a formal herring monitoring and consultation program to ensure that Project activities avoid take or disturbance of herring spawn and remain consistent with established aquaculture oversight in Humboldt Bay. At a minimum, the following measures should be incorporated:

- Pre-Work Herring Spawn Surveys: During the herring spawning season (December through March), all employees supervising work on tidelands should be trained by a Department biologist to identify herring spawn. Trained personnel should conduct pre-work surveys at each location where planting, harvesting, or maintenance activities are scheduled.
- Work Restrictions if Spawn is Present: If herring eggs are observed on eelgrass, culture materials, or adjacent substrates within or immediately adjacent to the work area, the operator shall: (1) postpone planting, harvesting, or disturbance in the affected area until trained personnel or Department staff confirm that eggs have hatched and spawn is no longer present (typically 2 weeks, but may be longer due to successive spawns), and (2) notify the Department's Eureka Marine Region staff within 24 hours of detection.
- Documentation and Coordination: The operator shall maintain records of spawning observations, notification dates, and Department coordination, and provide these records upon request.

Intertidal Mudflats

Comments: Humboldt Bay's intertidal mudflats provide habitat and foraging opportunities for numerous shorebird and waterfowl species, and fish such as longfin smelt, sturgeon, bat rays and leopard sharks. Several species important to commercial and recreational fisheries also exist within and adjacent to intertidal mudflat habitat in the proposed Project area, and could potentially be impacted by the Project, including Dungeness crab, rockfish spp., Northern anchovy, Pacific herring, and California halibut. Intertidal mudflats are protected under the State's 'no-net-loss' for wetlands policy, and all impacts should be avoided, minimized, and mitigated, with mitigation occurring prior to the implementation of the Project. The IS/MND does not describe the acreage of intertidal mudflat habitat that will be lost from Project development or propose mitigation to offset impacts.

Recommendations: The Department recommends the Final IS/MND include a comprehensive analysis of impacts to intertidal mudflat habitat which includes the following: (1) an evaluation of impacts to mudflat habitat from Project expansion activities, including impacts to adjacent mudflats caused by altered currents, erosion, and depositional processes; (2) an analysis of the reduction in foraging areas for shorebirds, waterfowl and fish species, such as salmonids, bat rays, green and white sturgeon, leopard sharks, and longfin smelt; and (3) a comprehensive mitigation plan to offset loss of intertidal mudflat habitat.

Water Quality

Comments: The IS/MND concludes that the Project would have no impact on water quality (Bio-A4). However, an increase in culture acreage within the Mad River Slough Channel warrants closer monitoring given the hydrodynamic characteristics of that system, and the already existing culture footprint. While NOAA tidal exchange tools show North Bay overall experiences substantial tidal exchange, regional planning and monitoring efforts recognize Mad River Slough as a distinct tidal and hydrologic unit (Humboldt Bay Sea Level Rise Regional Planning Feasibility Study, 2023). Shellfish aquaculture in relatively constrained tidal channels has the potential to increase organic matter deposition, alter circulation, residence time, and flushing rates. These changes have been documented to affect sediment oxygen, nutrient dynamics, turbidity, and water quality parameters such as dissolved oxygen and chlorophyll-a (Newell 2004; McKindsey et al. 2011, Xie et al. 2024). The Department is concerned that the Project's expansion could result in localized or cumulative effects on water quality, benthic habitat conditions, and eelgrass persistence if assimilative capacity is exceeded.

Recommendations: The magnitude and significance of potential water quality effects are highly dependent on site-specific conditions. The Department recommends that the Final IS/MND include a monitoring program with clear performance standards. Monitoring should inform adaptive management measures, such as adjusting stocking density or cultivation acreage, if water quality degradation is observed.

Cumulative Impacts

Comments and Recommendations: Humboldt Bay currently supports approximately 301 acres of intertidal aquaculture. The Project proposes adding 13.9 acres in the Mad River Slough Channel, a relatively constrained tidal channel. The Department recommends the Final IS/MND evaluate cumulative impacts. This evaluation should consider all existing intertidal and subtidal aquaculture leases, as well as other foreseeable projects in Humboldt Bay, such as the Offshore Wind Multipurpose Marine Terminal Project, and their combined effects on protected and sensitive species, habitats, water quality, and recreationally and commercially important species.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, section 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted

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online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by the Department. Payment of the environmental document filing fee is required for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, section 753.5; Fish & G. Code, section 711.4; Pub. Resources Code, section 21089.)

CONCLUSION

The Department appreciates the opportunity to comment on the IS/MND to assist the Harbor District in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination should be directed to Heidi Carpenter, Environmental Scientist at R7CEQA@wildlife.ca.gov.

Sincerely,



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