

## Noyo Harbor District – Community Sustainability Plan

TO Noyo Harbor District November 7, 2018  
FROM: The Community Sustainability Plan Team  
SUBJECT: Response to Community Comments 10/11/18

1. CSPs are required (by the Magnusen Stevens Fishery Conservation and Management Act'... 'for communities that wish to remain eligible to participate in programs such as the Individual Transferable Quota that allocates Catch share and instituted in the federal ground fishery in 2011.'

This requirement seems to pertain specifically to trawlers.

Can Fort Bragg Groundfish Association get a CSP specifically designed for the local groundfish community to meet this requirement? And why would their CSP need to include the rest of the harbor that has no involvement with Individual Transferable Quotas?

RESPONSE: One of the key CSP objectives is to support the allocation of groundfish quotas to Noyo Harbor. This will be for the benefit of the Noyo Harbor District (NHD) and the broader Noyo fishing industry complex. In particular, sustaining or increasing commercial groundfish fishing out of Noyo Harbor will sustain or increase “upstream” demand for harbor dredging and marina infrastructure as well as fuel supply, vessel supply and repair, fish receiving and processing, crew employment, and tourism related to working waterfronts. Ultimately this economic activity ripples outward to benefit much of the Noyo-Fort Bragg economy. The economic benefits thus go far beyond the Fort Bragg Groundfish Association (FBGA). Though they can speak for themselves, the NHD Commissioners opted to seek funding to participate in the CSP process specifically for these benefits to the entire harbor-area community. Quantifiable research and outreach necessary to support quota allocation will be part of the CSP and this is expected to be included on a list of CSP recommendations for Noyo Harbor.

The NHD expects the CSP will confirm and validate the economic, cultural, and social values that the commercial fishing industry provides to the overall Fort Bragg community, and the CSP will express their commitment to long-range planning.

2. Consistency with Conservancy's 2013 Strategic Plan Goals/ & Objective. as revised June 25, 2015.'  
Increase accessibility Create more inclusive access opportunities Support commercial and recreational fishing - What exactly does support mean?

A lot of what you read in the 'Coastal Conservancy Staff Recommendation for the Noyo Harbor District CSP' is unclear. So, what exactly is the harbor signing on to?

RESPONSE: The comment refers to a prior Coastal Conservancy Strategic Plan. The current 2018-2022 Strategic Plan contains the following objectives:

3. Revitalize coastal and inland waterfronts that provide significant public benefits and promote sustainable economic development.

3A Develop waterfront revitalization plans that increase accessibility, support fishing, encourage economic revitalization, promote excellence in urban design, enhance cultural resources, and are resilient to a changing climate.

3B Implement waterfront revitalization projects that increase accessibility, support fishing, encourage economic revitalization, promote excellence in urban design, enhance cultural resources, and are resilient to a changing climate

The Noyo Harbor CSP will be an independent document and its consistency with Coastal Conservancy objectives will be expressed in the form of NHD actions in support of commercial fishing and a working waterfront. The CSP is not a regulatory document and is not intended to increase regulations or vulnerability to any PMFC or Coastal Conservancy actions or suggestions.

The specifics of what support looks like for Noyo Harbor's commercial fishing industry is expected to be in the form of support needed for fishermen in terms of infrastructure improvements and upgrades desired for a host of Noyo Harbor District facilities.

3. Consistency with Conservancy's Project Selection Criteria & Guidelines:'

Promotion of the Conservancy's statutory programs and purposes. Consistency with purposes of the funding source. Promote and Implementation of state plans and policies.

California @50 (The Governor's OPR Environmental Goals and Policy Report. 2015)

California Ocean Plan (California State Water Resources Control Board. 2015)

These are both lengthy documents and appear to be plans for increasing environmental protections. Will implementing these state plans and policies actually help or hamper our working harbor?

RESPONSE: The California Ocean Plan (California State Water Resources Control Board 2015) is a plan that details the legislative policy of section 13000 of Division 7 of California Water Code which relates to waste discharge requirements. The California Ocean Plan has been in effect since 1972 and is updated and amended every 3 years. Compliance with its requirements is not optional. It spells out what waste can and cannot be discharged into our oceans. Efforts of the California State Water Resources Control Board are largely behind the reason we have effective wastewater treatment facilities and the raw sewage of 39.4 million Californians doesn't go straight from our toilets to the sea.

The California Governor's Office of Planning and Research (OPR) is the state agency that oversees long-range planning and research. OPR's report for California at 50 is an environmental goals and policy report. The 50 is in reference to the population of 50 million that California is projected to reach by the year 2050 (roughly 10 million more than are here currently). Policymakers are working to envision and implement, quickly, how to reduce Greenhouse Gas Emissions as the number of residents continues to climb. This document is informational and descriptive, but not prescriptive.

One of the documents cited is an amendment to a plan which has been in place for 46 years. The other is a report which the Coastal Conservancy feels is an important piece of guidance for long range planning for the state of California. To the extent that both documents address environmental issues that could potentially adversely affect our fisheries and Noyo Harbor, implementation of the state plans and policies should help the harbor.

4. 'Support of the public: The Project has received widespread support as evidenced by the support letters in Exhibit 2'

Three letters: One from the Harbor Commission One from the Fort Bragg City Council One from Supervisor Dan Gjerde. Can this honestly be described as widespread support?

There are people who do business in the harbor who either knew very little or nothing at all about any of this.

RESPONSE: The letters of support from the City of Fort Bragg, the County of Mendocino, and the Noyo Harbor District Commission were intended to help secure the grant and were successful in that regard. The community engagement component of the CSP is where participation from Noyo Harbor stakeholders is needed.

5. 'Without Conservancy funds, the Harbor District will be unable to fund plan preparation and consequently be ineligible for future implementation funding to revitalize the harbor. ' Is this true?

Exactly what funding will Harbor District be eligible for by accepting Conservancy Funds?

Exactly what funding would the Harbor District be eligible for without accepting Conservancy Funds?

As they say, "Show me the money!"

RESPONSE: The NHD is using a Conservancy grant and their own funds to pay for the CSP. This is for community benefit and will help provide a blueprint for NHD priority actions in years to come. We believe the cited language in the Conservancy staff report was intended to indicate that the grant was necessary in order for the NHD to undertake a CSP process and that this is a necessary first step in order to receive additional Conservancy grant funds for implementation of priority projects in the future. This document will also be helpful in efforts to secure funds from other agencies and lenders. Granting agencies want to see that agencies have engaged their public and developed a long-term plan that supports projects they are seeking funds for.

6. Sea level rise vulnerability - this project will begin the planning necessary to identity the adaptive management tools necessary to address the effects of sea level rise on the Novo Harbor Basin.

Sea level rise is unsettled science. Contrary to what the media pushes, not all scientists agree. But even if you accept NOAA's predictions, you'll find they estimate an increase of 1/8" per year - less than 1ft over the next 100 years.

Considering how the harbor is situated, does this really sound like a serious problem for the Harbor at this point in time?

RESPONSE: The physical effects of CO<sub>2</sub> and other greenhouse gases in the atmosphere are well documented by authoritative science. According to Dr James Powell in the *Bulletin of Science, Technology, and Society* (2016), only 4 of 69,406 authors of peer-reviewed articles on global warming rejected human-induced climate change linked to human-sourced greenhouse-gas emissions. The consensus on global warming among publishing scientists is thus above 99.99%. The peer-reviewed literature from scientists therefore contains no convincing evidence against global warming. It is notable that Dr Powell was appointed to the U.S. National Science Board by Presidents Reagan and Bush. The scientific method behind our understanding of climate change also brought us the undeniable benefits of modern medicine, among countless other examples. Thus, we cannot credibly "cherry-pick" what science to "believe," as evidence rather than belief is what distinguishes science from religion or politics.

Sea level rise on a global scale occurs due to both melting of terrestrial ice and to thermal expansion of warmer water. A rising sea is not the only concern with human induced climate change, however. Ocean acidification is a process caused by atmospheric carbon dioxide being

absorbed by seawater and reacting with seawater to form carbonic acid, resulting in a lower seawater pH. The oceans absorb about 25% of the CO<sub>2</sub> humans produce annually. A 30% increase in the acidity of the ocean has been observed since the industrial revolution. An increase of that intensity has not been seen in 300 million years (Climate Reality Project, June 2016). Ocean acidification causes a reduction in available carbonate ions that are essential to shell-building across many different groups of marine organisms, including Dungeness crab. Many of these organisms also form the basis of the marine food chain -- the essential foundation for salmon and other many other valuable marine fisheries. More broadly, the combination of acidification and warmer ocean waters have impacted and will increasingly continue to undermine traditional marine fisheries and will ultimately require adaptation to protect the livelihoods of fishing communities such as Noyo Harbor. Furthermore, extreme weather events such as droughts are also increasing as human induced warming has been occurring, which directly affects salmon and other fisheries.

In response to the comment, for Noyo Harbor specifically, climate change is very much a concern.

7. 'The Noyo Harbor commercial fishing industries urgently need a course of action to develop more financially and environmentally sustainable fishing practices and visitor serving facilities to remain viable.' Is this statement really true?

My husband is a commercial fisherman and he's never once said, "What I really need is a course of action. We've got to develop more financially and environmentally sustainable fishing practices. And we'll never remain viable without visitor serving facilities!" not once.

RESPONSE: This statement is reflective of the Coastal Conservancy's and the NHD's awareness that commercial fisheries are struggling in Noyo Harbor and California, generally. It is also in reference to the highly variable degree of stocks available for harvest due to environmental conditions as well as the overfishing that occurred in the past before fisheries regulators understood the impact by bottom trawlers and the derby style fisheries. These were not sustainable practice and actions taken by the PFMC in an effort to rebuild the habitats on the ocean floor and improve the stocks of the depleting species. The results of these actions have been favorable with many bottom fish stocks being rebuilt. The language of this statement might not seem practical to some but the intent behind it is merely highlighting the tough hits commercial fishing has taken as an economic sector in the last several decades. While the word "sustainable" is very general and is used in regard to anything one may want to uphold and support, when it is applied to commercial fisheries it relates to there being BOTH abundant stocks of fish in the future, and a vibrant community of fishermen targeting those stocks.

8. 'The proposed project would help resolve multiple issues related to the transition of the commercial fishing industry and visitor serving facilities at the harbor to more financially and environmentally sustainable practices including finding the balance between regulatory, economic and environmental conditions.'

What exactly does this mean? What kind of transition are they talking about? There seems to be no end to even more environmentally sustainable practices.

RESPONSE: There are a number of issues related to commercial fishing industry and visitor serving facilities transition to be addressed in the CSP. One is the size of boats using the mooring

basin, and how the dock and float replacement plan will accommodate the larger vessels. Others include ice and cold storage facilities, a fuel dock; and safe pedestrian access that does not limit working waterfront operations. These are all being addressed in a coordinated approach in the CSP. A key objective will be to demonstrate how regulatory processes (dredging, coastal program and land use consistency) and economic (job generation, seafood harvest allocations) can be accommodated in an environmentally sustainable manner.

9. 'Communities like Eureka and Shelter Cove have reacted to the challenges by developing long-term, community-driven strategic planning in the form of CSPs

Shelter Cove boating access is managed by the Humboldt Bay Harbor Recreation & Conservation District (HBHRCD) so I think we're really talking about one entity (HBHRCD) - not two. But regardless, Shelter Cove is primarily a recreational harbor.

What specifically have other working harbors accomplished with grant money? Which harbors? What projects? How funded? Did these projects require a CSP? And would these projects work in our harbor?

RESPONSE: The commenter is correct that a CSP is being prepared for Shelter Cove and Eureka. Their CSP is funded by a NOAA Saltonstall-Kennedy Grant (\$271,225) and a CSU Agricultural Research Institute Grant (\$50,000), and is administered through Humboldt State University. The HBHRCD has been very successful in securing grants that support commercial fishing and aquaculture. This includes a Headwaters grant for mariculture pre-permitting for the benefit of commercial aquaculture, both subtidal and intertidal and a \$200,000 Ocean Protection Grant to improve commercial fishing infrastructure at Shelter Cove. Shelter Cove has a long tradition of commercial fishing (notably the "mosquito fleet") and a keen interest in sustaining that activity in the face of many challenges. There have also been CSPs prepared for Monterey and Morro Bay. The focus is always on the unique challenges and opportunities for each harbor, and the NHD CSP will be consistent with that focus.

10. If we want to see improvements in the infrastructure of the Harbor is this really the way to go? Can we at least pause long enough to understand exactly what is being offered and what is being agreed to by accepting money from the Coastal Conservancy and paying for a CSP?

If you can stand it, read the Coastal Conservancy Staff Recommendation for the Noyo Harbor Community Sustainability Plan (plus all sections referenced), California @50 and the Coastal Ocean Plan.

You'll find a lot to question and a lot to be concerned about - particularly as much of it pertains to additional environmental conservation, rules & regulations and land acquisition by the state.

If you look at the Coastal Conservancy Website, you'll get a pretty good sense of their priorities.

RESPONSE: Coastal Conservancy objectives include "revitalizing coastal and inland waterfronts that provide significant public benefits and promote sustainable economic development" as documented in the response to question 2. A CSP scope of work has been developed and is being completed with Conservancy funding. The NHD is empowered through this grant to prepare a descriptive and advisory document which aims to represent Noyo Harbor exactly as it exists now. It is an opportunity to provide current accounting of businesses and harbor mooring capacity. It will also document condition of NHD facilities, including high dock and the mooring basin. It will also document need for ice, cold storage, fuel and other infrastructure and services vital to commercial fishing and the working waterfront. The CSP, upon completion will provide

the most current picture of Noyo Harbor and more importantly, the plans and recommendations for the future. It will include a definitive, substantive narrative of what is there, who is there, and also what is not there or is in need of repair.

A key aspect of the CSP is recommendations that the District will select based on community input. The top 10 recommendations in the CSP are expected to be driven by responses of those who operate commercial fishing vessels, who own businesses in Noyo Harbor, and who work there-should they choose to participate. These people are the CSP stakeholders. The CSP process offers multiple opportunities for community engagement and the NHD Commission has a strong interest in hearing ideas, concerns, and desires from stakeholders before the CSP engagement is expanded to the broader community. All input received thus far is that the harbor is a community asset to be nurtured. The final decision regarding the top 10 recommendations belongs to the Noyo Harbor District Commission. All indications are that this Commission is strongly in favor of supporting the commercial fishing industry and will make its decision for final recommendations in this spirit.

Most importantly, for Noyo Harbor stakeholders, is the understanding that a Community Sustainability Plan is an advisory, not a regulatory document or legal standard. Its value is in having a well-researched and community supported plan that helps define the future, unique for Noyo Harbor that clearly reflects its specific community and their needs.