



November 16, 2011

Stafford Lehr
Chief, Fisheries Branch
Department of Fish and Game
830 S Street
Sacramento, CA 95811

Dear Chief Lehr:

As a member of the Department's Aquaculture Development and Aquaculture Disease Committees I am not in support of the proposed changes to Fish Stocking Permits discussed at the Aquaculture Development Committee on October 14th, 2011.

The proposal seems to be more a response to forestall any future litigation and court action rather than a scientifically sound approach to risk management. It was stated that the proposed changes represent a very conservative approach. The proposed changes seem to go way beyond being conservative. It was stated during the meeting that "thousands" of Fish Stocking Permits have been issued over a period of several decades. No one at the meeting was able to recall any instance where a fish stocking permit resulted in a significant adverse impact to the environment or native species. That is a huge volume of evidence supporting minimal risk under the old stocking system. It was stated that "we don't know what effects may have occurred". However, for a species to be listed as a decision species, something must be known about their population. If fish stocking created significant adverse impact on these populations surely someone would have noted it.

The meeting was the first time I have been introduced to the concept of a CEQA "project". As described, the CEQA "project" concept is the whole of the action, not piecemeal segments of a broader action. There was only one EIR/EIS report. It seems to me that dividing issues into Phase I and Phase II is violating this principal. Surely the issues involved in Phase II will have an impact on activities proposed in Phase I. Even though it is not stated or implied, implementing Phase I is going to have an impact on Phase II, which is even more problematic than Phase I.

I believe the description and interpretation of the steps involved in obtaining a stocking permit under the proposed guidelines were presented in an honest and straightforward manner. However personnel and policy interpretation change over time.





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As the proposal is written it seems quite possible that any permit request can be denied using criteria such as historic range. A person could have a substantial investment in the process and evaluations that is lost if the permit is denied.

I understand that costs for evaluations have to be recovered. You have tried to come up with a fair way to distribute these costs. However, basing these costs on the distance to a State employee's residence or workplace just seems wrong. Is it even legal to have different fees for the same State services depending on where you live?

None of the proposed changes seem to help aquaculture development. They seem likely to make future development even more difficult. I recently returned from a national livestock meeting where the keynote address discussed global food production and security. They stated that 37% of the world's food will come from aquaculture by 2050. Where will that food come from and under what conditions will it be produced.

Sincerely,

Charles Palmer, D.V.M., M.P.V.M.
Veterinarian-in-Charge Redding District
California Department of Food and Agriculture

cc: Aquaculture Development Committee members

