



City and Borough of Sitka

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Coast Guard City

July 7, 2021

[VIA EMAIL ONLY]

Kate Lusby, Natural Resource Specialist II
550 W 7th Ave, Suite 900C
Anchorage, AK 99501
kate.lusby@alaska.gov

Re: Public and Agency Notice of Preliminary Decision – ADL 233127

Dear Ms. Lusby,

The application for the 10-year aquatic farmsite lease of a 15.0 acre portion of state tidelands located in No Thorofare Bay in Sitka Sound requires careful consideration and review of matters pursuant to the portion of the Sitka Coastal Management Plan (SCMP) enforceable policies adopted by ordinance into the Sitka General Code. It is the goal of the SCMP "to support the development of mariculture and aquaculture activities while minimizing adverse impacts to existing fish and seafood resources". The SCMP's objective is "to provide for and regulate the orderly development of aquaculture and mariculture activities and industries in order to encourage new economic development while protecting and enhancing the public resource".

The for-profit mariculture industry is growing in Alaska. Potentially, mariculture could prove to be a valuable addition to Sitka's economy, but care must be exercised to ensure that it will not cause major adverse impacts to existing resources, uses, and activities. The City and Borough of Sitka is in support of mariculture and aquaculture as long as the specific area is not in conflict with competing uses such as recreation, subsistence, and commercial uses. CBS recommends addressing trash and oil/gas spill procedures, environmental concerns, and invasive species awareness/control as other areas in Sitka Sound have been plagued with didemnum vexillum and botryllid tunicates. As the lessor, the State needs to assume responsibility of a potential invasive species introduction.

The City and Borough of Sitka would have no basis for objection to the issuance of this permit as long as all SCMP Enforceable Policies for Floating Facilities are met. CBS has no direct enforcement mechanism to ensure compliance on State tidelands, even though the enforceable policies clearly state the City's intent.

Thank you for this opportunity to comment.

Sincerely,

John Leach
Municipal Administrator