

In April 2019, ADFG established guidelines to provide a standardized and clear approach to reviewing mariculture permit applications. Application locations are to be assessed for overlap with marine mammals and a determination of whether there would be impacts from that overlap at the population level.

Overlap is defined as “activities (e.g., construction, mariculture, travel, etc.) less than 500 meters from a haulout site, **or that is obstructed from a haulout by a land mass.**” Activities that are more than 500 meters or [are less than 500 meters from a haulout site but] have a land mass obstructing the site are unlikely to significantly alter animal behavior.

The guidance further states that for **harbor seals, Steller sea lions and walruses:**

1. Overlap of mariculture facilities with individual animals or small groups (<50) or of areas that are **infrequently used** (animal use not documented in repeated species surveys) are of low concern. This level of overlap will almost certainly not result in population level impacts and therefore will not adversely affect wildlife or their habitats in an adverse manner.
2. Overlap of mariculture facilities with large haulouts (>50 animals) have the possibility of having significant adverse effects on pinniped populations, because these large haulouts **are typically biological important.**

Questions to discuss:

1. Is the state hard-set on this guidance, or is it possible to revise?
2. Regarding the definition of “overlap”: How do the 500 m distance threshold and obstruction by a land mass relate? If there is an obstructing land mass, wouldn't that reduce overlap?
3. What interval defines “infrequent” and how can we determine this with our surveys?
4. Does presence of >50 animals at the time of the surveys indicate the biological importance of an area.
5. Abundance is calculated by polygon. How do we distill abundance by polygon down to specific point locations?
6. Guidance is for harbor seals, sea lions, and walrus. Should we develop layers for all 3? Are SSL locations already sufficiently documented and available?
7. Can the MML data layer inform these siting decisions, or would we be better to develop a map layer based on expert knowledge of biologically important locations? Or a hybrid approach?