February 20, 2025

Celia Barroso
Regional Aquaculture Coordinator, California

Andrew Richard
Regional Aquaculture Coordinator Southeast Regional Office

Re: Programmatic Environmental Impact Statement for the Identification of Aquaculture Opportunity Areas in U.S. Federal Waters off of Southern California
Docket Number NOAA-NMFS-2022-0051

Draft Programmatic Environmental Impact Statement for the Identification of Aquaculture Opportunity Areas in U.S. Federal Waters of the Gulf of America
Docket Number NOAA-NMFS-2024-0135

Dear Ms. Barroso and Mr. Richard:

On behalf of the National Aquaculture Association[1] and the U.S. aquaculture community, please accept and share our appreciation to National Marine Fisheries Service and National Ocean Service staff for the excellent and in-depth work to identify suitable locations in federal waters for marine aquaculture farms.

Analyses to identify aquaculture opportunity areas were initiated by five public listening sessions and two 60-day public comment periods during late 2020. These comments informed two aquaculture area atlases released in late 2021, Gulf of America and Southern California, that benefited from 395 stakeholder meetings (military, natural resources, regional planning bodies, industries, navigation, research, environmental organizations, human health) involving 1,848 individuals and between 204 and 220 data layers encompassing national security, navigation, industries, oceanographic conditions, biological conditions, and federal and state agency authorities.

In May 2022 two notices of intent were published for a 60-day public comments on the risks, benefits, capacity, species and gear types, as well as long-term visions for offshore aquaculture development in the regions to inform draft programmatic environmental impact statements. During November 2024, a 90-day public comment period on the drafts opened that included

[1] The National Aquaculture Association (NAA) is a U.S. producer-based, non-profit trade association founded in 1991 that supports the establishment of governmental programs that further the common interest of our membership, both as individual producers and as members of the aquaculture community. For over 34 years NAA has been the united voice of the domestic aquaculture sector committed to the continued growth of our industry, working with state and federal governments to create a business climate conducive to our success, and fostering cost-effective environmental stewardship and sustainability.

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three public listening sessions. All of the information and public responses were published to the internet at National Marine Fisheries Service and regulations.gov webpages and freely available to the public.

The simultaneous, complex, thoughtful and thorough efforts to gather and integrate, social, economic, biological, ecological, and regulatory information, was massive in scale and scope and entirely unprecedented by any agency at any time to assess potential ocean use. We also note this effort has resulted in geographic areas identified by the atlases being dropped for consideration within the draft programmatic environmental impact statements.

The May 2020 Executive Order, which initiated this massive effort was very clear, and throughout this effort the National Marine Fisheries Service has clearly stated, the goal is to identify *suitable* farm locations. We believe the goal has been realized. However, suitability is not a certainty to produce fish, shellfish or seaweed that may or may not be competitive in a global marketplace where the United States imports 75 to 80% of the seafood Americans consume and farms must comply with an expensive, time-consuming and fully transparent federal and state regulatory framework that governs aquaculture, whether at-sea or on-land.

There is little doubt that detractors, and often well financed critics, of U.S. offshore marine aquaculture, particularly finfish farming, have significantly contributed to its lackluster growth compared to other countries.

We acknowledge marine aquaculture is not free of potential environmental, economic, social and cultural impacts and challenges remain to achieving sustainable production. The good news is these challenges are well known, and they are the focus of not only the American science and technology enterprises, but by a global network of scientists from many coastal nations focused on expanding seafood production from the ocean. The realities of the current marine aquaculture seascape bode well for a more productive future:

1) There is a clear global imperative to sustainability produce more seafood from capture and culture fisheries to meet constantly growing national and global demand. The U.S. has the marine resources to become a major exporter, if U.S. law can be amended to grant offshore farmers a property right or security of tenure for sites in federal waters.
2) U.S. farmers work within a very complex and effective legal, regulatory, and science-driven environment to anticipate and mitigate potential impacts.
3) Farm level management decisions and federal and state regulatory frameworks are working together to bring about environmentally beneficial siting, operational and production outcomes.
4) Commercial aquaculture advocates in government, universities and the farming community have recognized it is essential to reach out to decision-makers and the public, as well as the critics, with the latest research and empirical results to describe an accurate picture of the risks and rewards to farming the sea.

5) Greater communication and engagement efforts, targeted public research expenditures, and greater offshore, commercial-scale farming experience will enhance the U.S. marine aquaculture track record going forward.
6) Farming offshore is not risk-free. Fortunately, we can and are looking to nations like Canada, Chile, China, Japan, Norway, Panama, Mexico and nations bordering the Mediterranean Sea that are well ahead of the United States in producing farmed seafood to learn from their experiences.
7) The current federal permitting process is thorough, complex, time-consuming and expensive. While it is appropriately thorough and rigorous, we are hopeful it will become more efficient through implementation of the *Strategic Plan to Enhance Regulatory Efficiency in Aquaculture*[2] of the National Aquaculture Development Plan. We, as citizens of the United States, are desirous of protecting and conserving the oceans for the next seven generations.

The comprehensive work done to identify potential development sites and to address potential stakeholder concerns is important. Those efforts will assist in providing investors greater confidence to invest in ventures that inherently have risks associated with them. It is critical that all federal agencies take the next step and actively support the development of several pilot projects that concretely demonstrate feasibility and success in this promising sector. That support should include, but not be limited to, financial tools that help reduce risk and improve the competitiveness of those projects in the face of products produced in other countries that are heavily subsidized by their governments seeking to gain a competitive advantage.

If you should have questions or need additional information, please do not hesitate to contact us.

Sincerely,

Sebastian Belle
President

cc: Danielle Blacklock, Director, NOAA Office of Aquaculture

[2] The Strategic Plan to Enhance Regulatory Efficiency in Aquaculture is a product of the Subcommittee on Aquaculture authorized by the National Aquaculture Act of 1980 and contributes to the Executive Office of the President, National Science and Technology Council, Committee on the Environment.