WEST COAST SEAFOOD PROCESSORS ASSOCIATION
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December 10, 2015

U.S. Environmental Protection Agency, Region 9
ATTN: (WTR-2-3)
75 Hawthorne St.
San Francisco, CA 94105

Ladies and Gentlemen:

The following comments regarding the scoping of the Rose Canyon Sustainable Aquaculture Project to be conducted by Rose Canyon Fisheries (RCF) are submitted on behalf of the West Coast Seafood Processors Association (WCSPA). Members of WCSPA include large and small processors of salmon, groundfish, crab, and shrimp with facilities located in Washington, Oregon, and California; associated seafood-related businesses; and various commercial fishing vessels.

RCF plans to develop an offshore aquaculture project which is projected to raise up to 5,000 mt of yellowtail jack per year at peak production, with possible substitution of white sea bass and / or striped bass. All of these species are endemic to southern California waters (striped bass is an introduced species which has become well established), are not listed under the Endangered Species Act, and are not designated as "overfished" or subject to overfishing under the Magnuson Stevens Fishery Conservation and Management Act. We therefore believe that the project will not prove detrimental to existing fisheries and in fact may enhance the continuation and development of new fish processing infrastructure. Further, the proposed location for the project does not interfere with known navigation channels or fishing grounds and is not located in any habitat areas of particular concern. In short, all of the impacts will be positive.

As a general note, there is a growing need for the development of aquaculture projects in the U.S. Nearly 80% of our seafood is now imported. Wild capture fisheries are generally stable and in the U.S. are approaching maximum sustainable yield. If we hope to feed the world – including ourselves – in the coming decades, we need to develop the most up to date aquaculture technology and infrastructure. RCF's project can be a showcase and an economic incubator to give the U.S. what it needs to be a real player in the world aquaculture industry. We therefore recommend that this project go forward.

Sincerely,

Rod Moore

Rod Moore
Senior Policy Advisor