THE MARITIME ALLIANCE

Promoting BlueTech and Blue Jobs®

December 10, 2015

Ms. Elizabeth Sablad
Environmental Scientist
US EPA Region 9
75 Hawthorne Street
(WTR-5)
San Francisco, CA 94105

Re: NEPA Review for Rose Canyon Fisheries Sustainable Aquaculture Project

Ms. Sablad,

On behalf of **The Maritime Alliance**, thank you for the opportunity to express our support for the Rose Canyon Fisheries (RCF) application for permits from the U.S. Army Corps of Engineers (ACOE) and the U.S. Environmental Protection Agency (EPA) to operate a commercial aquaculture farm off the coast of San Diego in our nation's Exclusive Economic Zone (EEZ).

According to a 2012 study, the San Diego regional **Blue Economy** includes more than 1,400 companies, 46,000 jobs and more than $14 billion in direct annual sales. **The Maritime Alliance** is the non-profit industry association and organizer of the regional ocean and water technology community – the **BlueTech** cluster – with 19,000 jobs and $6.2 billion of the totals and, as such, is the largest such cluster in the U.S. We focus on economic development, ecosystem development, and national/international outreach. Our sister organization, **TMA Foundation** is an educational non-profit that focuses on workforce development, research, and community outreach. Together they promote sustainable, science-based ocean and water industries.

We are big supporters of aquaculture. On a macro level we know the world's growing demand for seafood is exerting ever greater pressure on fisheries. Currently, the United States imports more than 90% of the seafood we consume, of which over 50% is farmed in locations around the world where we have no regulatory oversight. The Food and Agriculture Organization of the United Nations, and our own Departments of Commerce and Agriculture recognize that our nation's seafood production will need to drastically increase over the next 20 years and that aquaculture must play a major role in meeting that need. So we have an opportunity to reduce the carbon footprint of seafood that we consume, create thousands of local jobs, relieve pressure on natural fisheries, produce a sustainable source of protein to meet growing demand and exert regulatory oversight over the practices and methods of aquaculture.

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The U.S. has the largest agricultural economy in the world. This vital sector employs hundreds of thousands workers, feeds hundreds of millions of Americans, and exports extensively to help meet food needs internationally. It is time we turn this proficiency toward our ocean resources, to complement our existing land-based food production capability.

Studies published by U.S. and international researchers report that aquaculture, conducted properly, is the most sustainable way to produce animal protein for human consumption. It requires no fresh water, minimal land-based support infrastructure, and minimal energy. The RCF project will take the best of what we know today and continue to evolve as new technologies and protocols are developed, thereby helping establish the highest standards.

The Southern California Bight – the curved coastline of Southern California from Point Conception to San Diego – is one of the best locations in the world for aquaculture and has the potential to create tens of thousands of good paying jobs and billions of dollars in economic activity. **The Maritime Alliance** is working with partners to create a **BlueTech** Incubator and three national Centers of Excellence in Maritime Robotics, Water Technology and BioMarine. The BioMarine CoE will include aquaculture as an area of focus, which help support the growth of sustainable, science-based aquaculture related jobs in the region.

San Diego has historically been a mecca for commercial fishing, which continues today on a smaller scale. We recently worked with the County of San Diego, the Port of San Diego, and California Assembly Speaker Toni Atkins on Assembly Bill 229, which passed unanimously and was signed by the Governor to establish state code for the creation of Fishermen's Markets. These markets allow commercial fishermen to sell whole or eviscerated fish directly to consumers. The public response has been incredible. The Saturday-only market, which includes aquaculture sourced seafood, welcomes hundreds of people to the waterfront every week to chat with the fishermen, learn where their fish come from and how they were caught. This is vital to supporting a local sustainable supply of seafood.

We are fortunate that RCF is blazing this trail for fin-fish aquaculture in Federal waters because they understand the science and are committed to raising fish in an environmentally, economically, and responsible manner.

We respectfully request that you support the RCF project. Thank you for your consideration.

Sincerely,

Michael Jones
President

Greg Murphy
Executive Director

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