Indigo Seafood

December 17, 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,

I am writing in 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 in our nation's Exclusive Economic Zone (EEZ) off the coast of San Diego.

I have retired from the NOAA National Sea Grant College Program where I was the Program Director for Marine Aquaculture for 22 years. During that time NOAA Sea Grant funded nearly $100 million dollars of marine aquaculture projects in over 30 Coastal and Great Lakes states that has led to US a marine aquaculture industry valued at over $400 million dollars a year. A very good return on investment. However, much of the benefit from this investment has ended up overseas because of opposition from special interests and the exaggerated fear of environmental damage from marine aquaculture practices.

NOAA Sea Grant and the National Marine Fisheries Service have held many national and international workshops to identify the most environmentally and economically sustainable aquaculture techniques. To sum up the result, marine cage culture in offshore areas mixed with multi-trophic species culture to absorb nutrients, balanced ecosystem approaches for species used and improved diet formulations using a variety of protein sources can all contribute to sustainable marine aquaculture operations. But we have to try these things out on commercial scale to move forward and improve. Without a vibrant offshore marine industry new developments will be slow. These new developments will help other nation's marine aquaculture be more sustainable in the future.

The technology of today is not the technology of tomorrow and continued federal investment in marine aquaculture technologies will lead to a broad spectrum of technologies that will make all forms of marine aquaculture more sustainable.

Recent studies published by U.S. researchers as well as by international, non-governmental organizations report that aquaculture, conducted properly, is by far the most sustainable way to produce animal protein for human consumption. This is especially true of marine aquaculture, which requires minimal land-based infrastructure, no fresh water and minimal energy consumption. The RCF project will take the best of what we know today and then evolve as new technologies and protocols are developed, thereby ensuring that it constantly strives to set the highest standards for sustainability.

As you know, the U.S.A. has the largest agricultural economy in the world. This vital sector employs hundreds of thousands workers and feeds millions of Americans. It's high time we turn this proficiency toward our ocean resources, to complement our existing land-based food production capability.

Our nation is also known for innovating technologies and fostering breakthrough industries that raise the standard of living for all U.S. residents. San Diego, where RCF is proposed to be operated, is a center for biotech, medical research and information and ocean technologies that have contributed significantly to the regional economy and to our quality of life. A study conducted by the San Diego Regional Economic Development Corporation predicts that RCF will support hundreds of good paying jobs, help our seafood industry sustain the working waterfront and provide millions in taxes annually. RCF is a good example of an enterprise that serves our needs while respecting the environment we all enjoy.

The Rose Canyon Fisheries project is critical and it has my full support.

James P. McVey

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