EON Aqua, LLC
12 Birch Hill Rd
Lee, New Hampshire 03861

December 14, 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 have been active in the marine finfish aquaculture industry for over 20 years, having founded both hatchery and cage farms in the United States and overseas. I have served 6 years as a MAFAC member and am currently a member of the NOAA/MAFAC Aquaculture Task Force. I am astonished at how long it has taken the government of United States to see the necessity to support sustainable ocean farming. We now have a great opportunity to change this.

I am writing to offer my 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.

The Earth's oceans are not able to meet the growing worldwide demand for seafood and aquaculture is critical to our nation's food supply. Over 50% of today's existing supply of seafood is farmed. Both 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.

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.

Rose Canyon Fisheries will serve as a model for the development of sustainable, offshore aquaculture, which will demonstrate a new local, regional and national paradigm for seafood production; will help revitalize the commercial fishing industry by building upon existing working waterfront infrastructure that receives, processes and distributes seafood. This project will provide necessary data for establishing the regulatory framework for an offshore aquaculture development in our nation's Exclusive Economic Zone, the largest EEZ in the world.

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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.

Sincerely,

George Nardi
EON Aqua, LLC