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

December 15, 2015

Re: NEPA Review of the Rose Canyon Fisheries Sustainable Aquaculture Project
Dear Ms Sablad:

Rose Canyon Fisheries (RCF) has submitted applications for permits from the U.S. Army Corps of Engineers (ACOE) and the Environmental Protection Agency (EPA) to site and operate a commercial fish farm in federal waters off the coast of San Diego. As a 30 plus year professional member of the U.S. aquaculture industry, I am writing to offer my strong support for this project, as EPA initiates the scoping process by soliciting comments from stakeholders.

Recently, the Marine Aquaculture Advisory Committee (MAFAC) that advises the Secretary of Commerce on fisheries and aquaculture policy, and the National Oceanic and Atmospheric Administration (NOAA) created an Aquaculture Task Force (ATF) of highly experienced members of the marine aquaculture industry to review its Aquaculture Program and advise the updating of the NOAA Strategic Plan for Marine Aquaculture. Among the most significant findings were the following:

- The U.S. is increasingly relying on imports to satisfy rising seafood demand – expanding from 86% of supply in 2007 to 91% of supply in 2014 – and causing growing concerns about America's seafood security.
- Domestic seafood supplies will not be bolstered significantly by active government management of capture fisheries – one recent NOAA estimate done for MAFAC indicates if the 59 stocks under federal management are rebuilt, then it would result in $800 million less imports or only 4.4% of the large and growing $18 billion 2013 value.
- The large volume of U.S. seafood imports has led to an annual seafood trade deficit of $12 billion – notably the U.S. is the number one or two seafood importer in the world, yet ranks only 15th and falling in aquaculture production.
- Other documented megatrends that will increase short-term and long-terms risk of import supple chain disruption, i.e., U.S. food security, include: global climate chain impacting wild fisheries harvests; growth of mega cities in the developing world, which will affect the global flow of supply; the growing middle class in developing countries will divert export supplies; and emerging and recurring geopolitical conflicts that can suddenly disrupt the global seafood trade.

The ATF concluded that there is an urgent need to develop commercial marine fish farming in the federal waters of the Exclusive Economic Zone to increase domestic seafood production. Immediate action to demonstrate commercial-scale marine fishing farming is required and the industry and the country is fortunate to have highly experienced entrepreneurs such as Hubbs Sea World Research Institute (HSWRI) and Cuna Del Mar (CDM) spearheading this project. HSWRI is San Diego based research institute that is well known nationally and internationally for its sustainable marine aquaculture research. CDM is a forward-looking, private equity firm that has invested in marine aquaculture companies that are pioneering offshore farming around the world. RCF has clearly and

accurately described a phased commercial project in their Final Report that utilizes the best available science for cage technology and siting and operating a sustainable, large-scale farm in an open ocean environment.

The benefits of implementing this project to the state of California, the nation and the world are many. For California and San Diego, studies indicate significant economic impacts at full build out, using economic multipliers, of more than $ 50 million in annual total economic impact, more than 300 total jobs and $ 93 million in new state and local taxes. For the nation, it will be the first large-scale, open ocean commercial fish farm in federal waters and its successful permitting will influence other entrepreneurs in other regions to find and develop sites. For the world, this leading-edge technology project can be a beacon showing where significant future supplies of fish will be come from; as Cousteau said, "farming the sea as we do the land."

This project has my full support and its approval by federal and state authorities is essential to demonstrating a readily available means for the U.S. to expand domestic supplies of seafood through large-scale commercial aquaculture in federal waters. Thank you for the opportunity to make these comments.

Sincerely,

John S. Corbin
Chair, ATF, MAFAC
NOAA, USDOC, and

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