From: George Liddle
To: R9RoseCanyon
Subject: Proposed RCF Aquaculture Project
Date: Friday, January 15, 2016 1:17:09 PM

To Whom It May Concern:

The first open ocean finfish aquaculture project in federal waters has been proposed 4.5 miles off the coast of San Diego. While I'm excited about the potential for aquaculture projects to reduce human impacts on our wild ocean ecosystems, this particular project promises much but delivers too little.

My primary concern is the absence of any direct link between the raising of fish in these pens and the ongoing commercial harvest from wild populations. Proponents of this project are touting its benefit for wild fisheries to the public. According to a publication of Hubbs Sea World Research Institute, a part-owner of Rose Canyon Fisheries (RCF), "The wild fisheries will benefit as a supplemental supply of high quality farmed fish will take pressure off wild fisheries."(1) While I feel this is a laudable goal, RCF is not in a position to make good on such promises. However, as the lead agency for evaluating and potentially permitting this project, the EPA is in an excellent position to prevent the public from being being misled, to ensure that the project will benefit wild fisheries, and to help the RCF facility live up to the public statements of its owners.

I urge the EPA, together with the cooperating agencies, to make an explicit pound for-pound connection between the production of finfish at aquaculture facilities and the commercial take quotas of ecologically similar wild-caught finfish at US ports a pre-condition for permit issuance. Furthermore, I urge the EPA to ensure that all wild-caught animals that are fed to the penned fishes are also counted against appropriate commercial wild-caught take quotas. While there are obviously numerous other environmental concerns about the implementation of finfish aquaculture projects, I am confident that if they result in direct reductions in appropriate wild-caught take levels, which is only a formalization of RCF's public statements, these potentially harmful impacts can be substantially mitigated by appropriate regulation.

I appreciate your attention to this important matter.

Sincerely,

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(1) - http://www.caaquaculture.org/2015/01/16/hswri-rose-canyon-fisheries-paves-the-way-for-sustainable-ocean-farming-off-san-diego/