



July 20, 2022

Scott M. Rumsey

Acting Regional Administrator

NOAA Fisheries West Coast Region

Sent electronically

RE: NOI to prepare a programmatic environmental impact statement for identification of one or more Aquaculture Opportunity Area(s) in Southern California

Dear Administrator Rumsey,

**Who we are**

The Alliance of Communities for Sustainable Fisheries (ACSF) is a 20-year-old 501(c)(3) not-for-profit organization, founded for the purposes of educating the public on fisheries issues, connecting fishing men and women (“fishermen”) with their communities, and representing fishing interests in state and federal processes. The ACSF is a regional organization, with commercial fishing leaders, representing Monterey, Moss Landing, Santa Cruz, Morro Bay, Pillar Point, and Port San Luis, on our Board of Directors. Port communities, several recreational fishing organizations, and the California Wetfish Producers Association (squid, sardines, etc), also have representatives on our Board. Thus, the ACSF represents a large cross-section of fishing and community interests for the Central Coast of California.

**General Comments**

The ACSF appreciates the opportunity to comment on the Notice of Intent (NOI) to Prepare a Programmatic Environmental Impact Statement (PEIS) for

## Identification of One or More Aquaculture Opportunity Area(s) in Southern California.

First, we herein establish that we fully support both the comments provided by the Pacific Fishery Management Council and the non-profit organization, Commercial Fishermen of Santa Barbara. The ACSF will not seek to reiterate those comments, but we may provide emphasis and/or added detail.

Our organization also appreciates the approach that NOAA has taken in attempting to create an Atlas to help identify areas of least conflict for new ocean uses, and NOAA's willingness to conduct the PEIS prior to advancing leases or projects. This is right approach, and we contrast it with BOEM's problematic approach of leasing first, then conducting more complete environmental analysis for offshore wind development.

### **The main message**

Fishermen do not support aquaculture projects that remove productive fishing grounds from harvest opportunity. We have lost, and are continuing to lose, areas to MPA's (state and federal), wind energy projects, telecommunication cables, shipping lanes, etc. These closures, plus temporary closures such as to avoid whale interactions, have already put California fishermen on the ropes.

### **Addressing certain requested sixteen areas of information:**

(2) Suitable species and gear for aquaculture.

The ACSF strongly concurs with the Commercial Fishermen of Santa Barbara recommendations that non-native species and finfish aquaculture be disallowed in all designated aquaculture areas, and elsewhere in federal waters.

Although not part of the PEIS scope, we strongly believe that the Pacific Ocean Aquafarm finfish project should not be permitted, anywhere.

(5) Potential impacts to biological, physical, social, cultural, and economic resources.

First, we share the environmental concerns expressed in both previously cited letters.

Second, finfish aquaculture has the potential to seriously upend the social, cultural, and economic fabric of wild-capture fisheries and the communities that depend upon and identify with these historic fisheries. Finfish aquaculturists would not develop these businesses if they did not believe that their products will have a competitive advantage over wild-captured seafood. This will, of course, gut the value of wild capture products.

Perhaps even more disturbing is the question: Why is the US government and NOAA seeking to advance finfish aquaculture instead of enabling its existing fisheries to harvest greater percentages of the total allowable catch (to OY) of many west coast species? The groundfish fishery, for example, has left multi-millions of pounds of fish unharvested each year since the ITQ system was adopted. The ACSF respectfully submits that NOAA would be more helpful to fishermen and US citizens if it put more energy into enabling more fish to be harvested responsibly. West coast fisheries do not have an overfishing problem, but many do have an underutilization problem.

(11) Potential interactions with commercial and recreational fishing industries...

The NOS-developed Atlas is a peer-reviewed science product that claims to have been vetted by a panel of experts. However, as documented in the PFMC letter, numerous errors are made, including mis-using location monitoring data sets. Even more perplexing is that we can find no Santa Barbara and Ventura area fishermen who were consulted to ground truth the proposed areas of least conflict. To quote the PFMC letter:

“This above results in less confidence in the analysis provided in terms of potential impacts to fisheries and fishing communities. As such, we recommend NOAA engage with the local commercial and recreational fishing industries in an effort to validate and correct the datasets provided in the Atlas and used in the Area identification process.”

The ACSF believes that the eight northern region aquaculture sites must be put on hold until NOAA consults with the regional fishing industry. If corrections to the Atlas are not made, at minimum NOAA should consult with local fishermen to obtain finer-scale information about the proposed Selected Site Options and alternative locations.

12) Information on other current or planned activities...

Aquaculture projects should not be sited in locations that interfere with long-standing scientific surveys and stock assessments. The PEIS should evaluate this potential interference and suggest ways to avoid or mitigate this interference.

**(15) Input related to how an AOA could simultaneously support aquaculture development along with environmental, economic, and social sustainability—including ways to incorporate mitigation and cost-benefit analyses.**

In the event that offshore aquaculture projects advance to the permitting/lease stage, the ACSF believes that appropriate mitigations must occur. These could be in the form of opening a section of the ocean currently closed with similar habitat to fishing, and/or requiring aquaculture developers to enter into binding Fishing Community Benefit Agreements (FCBA). FCBA's would provide yearly funding to affected commercial fishing port-based associations to compensate the industry as a whole by creating funded programs aimed at enhancing the economic resilience of regional fisheries. West Coast fisheries can not continue to absorb the loss of fishing grounds (to offshore wind, MPA's, cable routes, etc) if it is to survive.

The PEIS should examine, under "cumulative effects", the socioeconomic and cultural effects of further displacement of fisheries.

Thank you for considering comments from the Alliance of Communities for Sustainable Fisheries.



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