Richard L. Spees



Akerman

December 9, 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 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.

For a number of years I served as the Washington representative for the Ocean Stewards Institute, a non-profit organization dedicated to promoting safe, sustainable open ocean aquaculture in U.S. waters. I am familiar with the open ocean aquaculture industry and understand the industry's immense potential. Based on my knowledge, I can confirm that the Rose Canyon Fisheries (RCF) is an outstanding example of how aquaculture should be done.

Our nation has a growing demand for seafood which cannot be met by wild fishing stocks. Over 80% of our seafood is imported -- the second largest component of our national trade deficit after oil. It is essential that we develop new domestic sources of quality seafood.

It is also essential that we develop those capabilities in an environmentally sustainable manner. RCF is a model for that. RCF will also foster innovative technologies to insure that our nation's aquaculture maintains the highest standards for sustainability and safety in the future. RCF will also generate jobs and economic development.

For all these reasons, I strongly support, RCF. Please approve the permits needed to allow the project to start.

Sincerely,

Richard L. Spees akerman.com

From:	dwaynesda@juno.com
То:	<u>R9RoseCanyon</u>
Subject:	Aqua culture project off San Diego Coast
Date:	Monday, January 04, 2016 4:06:37 PM

I have a giant concern with this project. As you know, there are live bluefin tuna pens (aquaculture) located just below the Mexican border from San Diego. Those fish have to be fed a lot everyday to keep them growing. The problem with the tuna pens is that sardine, mackerel and anchovy seiner boats have basically wiped out the bait population of northern Baja Mexico. I have a house in San Quintin (100 miles south of the tuna pens) and have seen the bait population in the area raped by the seiners that come in there everyday looking for tuna food over the last 5 to 7 years. Mackerel, anchovies and sardines used to be so thick you could almost walk on them. Not any more.

I am afraid of the same thing happening here in San Diego with the proposed aquaculture pens. The fish food has to come from some where, and local bait populations certainly are enticing to the business owners of the pens.

My vote is no on the aqua culture pens.

Dwayne Patenaude San Diego.

December 15, 2015

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

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

President Aquaculture Planning and Advocacy LLC 47-215 Iuiu Street Kaneohe, Hawaii 96744 Phone: 808 239-8316 E-mail: jscorbin@aol.com



CALIFORNIA AQUACULTURE ASSOCIATION

> P.O. Box 4638 Chico, CA 95927 www.caaquaculture.org

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Director | **Jackie Zimmerman** Skretting

Staff Legislative Advocate | Rob Ross

Executive Director | Michael Lee

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,

On behalf of the California Aquaculture Association (CAA), I am writing to offer our 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. 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 our full support.

Sincerely,

Michael Lee. Executive Director

California Aquaculture Association



December 15, 2015

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

Re: NEPA Review for Rose Canyon Fisheries Sustainable Aquaculture Project

Ms. Sablad,

We are writing to offer our 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.

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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 our full support.

Respectfully submitted,

Ted Owen, President/CEO Carlsbad Chamber of Commerce

John R. Ostome

John Osborne, Chairman of the Board Carlsbad Chamber of Commerce



THE CITY OF SAN DIEGO

December 17, 2015

Sent via Electronic Mail: R9RoseCanyon@epa.gov

U.S. Environmental Protection Agency, Region 9 ATTN: (WTR-2-3) 75 Hawthorne St. San Francisco, CA 94105

Subject: Comments on Scoping for the Rose Canyon Fisheries, Inc. (RCF) proposed Sustainable Aquaculture Project

The City of San Diego, Public Utilities Department, is pleased to offer comments in response to the notice of Scoping for the Rose Canyon Sustainable Aquaculture Project. It is our understanding that these comments will be used to assist in the preparation of an Environmental Assessment (EA) to analyze the potential impacts related to the issuance of an NPDES permit for the project. In view of this, the City also understands that another comment period will be available once the draft EA is completed and published for public review. It is anticipated that more specific comments may be made at that time depending on how the EA addresses any issues brought up during the scoping process.

For purposes of the scoping process the following comments are submitted:

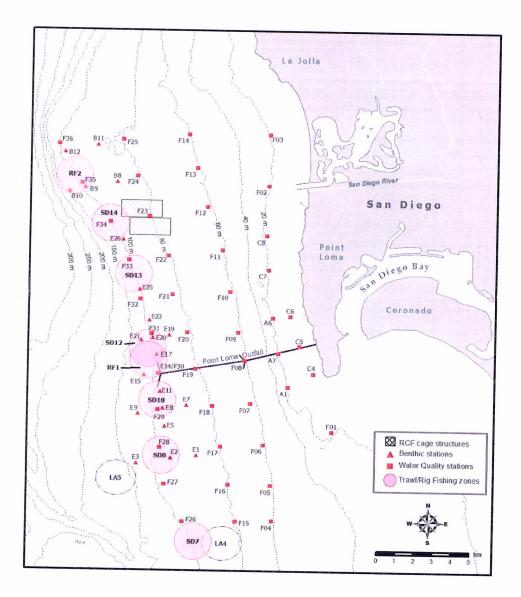
- 1. General Comments
 - a. The City of San Diego operates the Point Loma Wastewater Treatment Plant that discharges 4.5 miles offshore of the Point Loma peninsula at a depth of 310 feet. This plant successfully operates with a modified National Pollutant Discharge Elimination System (NPDES) permit that obviates the need for secondary treatment. By constructing one of the longest and deepest outfalls in the world and implementing an extensive and robust ocean monitoring program, the City invested the resources necessary to qualify for a modified permit. Critical to the continuing approval of this modified permit is maintaining the soundness of the City's ocean monitoring program, an important aspect of which is the ability to discern outfall discharge effects from other local and regional impacts.
 - b. Future water and wastewater planning strategies for San Diego, including the creation of 83 million gallons of potable water per day via wastewater reclamation, as well as the resulting reduction of flow to Point Loma, are made achievable by maintaining the Point Loma modified permit. Threats to the modified permit, including any loss of integrity to the ocean monitoring program, jeopardize these plans and also expose the City to a liability of nearly two billion dollars.



Page 2 U.S. Environmental Protection Agency, Region 9 December 17, 2015

- 2. Specific Comments and Recommendations
 - a. The proposed site for the Rose Canyon Fisheries (RCF) submersible cage structures is located within the NPDES permit mandated monitoring grid for the Point Loma Ocean Outfall (see **Figure 1**). Consequently, it will not be possible to continue the existing monitoring program and to achieve the objectives for which it has been designed if the aquaculture project is located as proposed. Construction and operation of the RCF project at the proposed site will impact field sampling efforts, as well as environmental assessment and reporting requirements for the City's long-term monitoring program for the Point Loma region, a program that began in the 1960s and which was expanded to the current discharge region in 1991. Additionally, if acceptable adjustments to the program were possible it could potentially result in an increase in costs to the City.
 - b. The proposed site location will prevent sampling at some critical monitoring stations.
 - i. The RCF cages will physically preclude sampling at station F23, which is an important site for monitoring water quality conditions and northward dispersion of the Point Loma Ocean Outfall (PLOO) wastewater plume.
 - ii. The RCF cages will physically impede sampling within northernmost trawl zone SD14, which is an important reference area for assessing the health of the demersal fish community and other marine life.
 - iii. The RCF cages will affect the station selection process for future "randomly selected" benthic stations that are monitored during the summer each year.
 - c. RCF operations will negatively impact the ability to monitor wastewater dispersion from the PLOO.
 - i. Expected inputs to the water column from the aquaculture project will make it impossible for the City to effectively monitor dispersion or any possible impacts of the wastewater plume in the northern third of the monitoring region. Thus, this will eliminate any further utility of these northern sites as reference stations.
 - ii. Expected inputs to the seafloor from the aquaculture project will make it difficult or impossible for the City to effectively monitor potential wastewater effects on sediment quality or macrobenthic invertebrate community structure at benthic stations E26, B8, B9, B10, B11 and B12. Thus, this will eliminate the future utility of these sites as reference stations.
 - iii. Expected inputs to the water column and seafloor from the aquaculture project will make it difficult or impossible for the City to effectively monitor potential wastewater effects on fish communities at trawl station SD14 and rig fishing station RF2. Thus, this will eliminate the future utility of these sites as reference stations.

- d. If the RCF project is approved, it is recommended that the cage structures be relocated to at least 1 mile north of the PLOO monitoring grid (e.g., north of stations F25, B11 and F36 in Figure 1) in order to prevent disruption to the decades long monitoring program for the Pt Loma outfall region.
- e. Since fish aquaculture projects such as that proposed are alleged to be sources of organic enrichment, nutrients and other contaminants, consideration must also be given to discerning potential impacts specific to the project. Thus, it is highly recommended that any NPDES permit for the project include a rigorous Monitoring & Reporting Program strong enough to distinguish between future project specific effects from other regional inputs.
- f. Pre-discharge monitoring may also be necessary for the final site location in order to achieve a baseline for the area prior to implementation of the project.



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Figure 1

Map of proposed site for the Rose Canyon Fisheries (RCF) Sustainable Aquaculture Project submersible cage structures, along with NPDES-mandated receiving waters monitoring stations for the City of San Diego's Point Loma Ocean Outfall (Order No. R9-2009-0001, NPDES Permit No. CA0107409). Not shown are locations of 40 randomly selected benthic stations that are selected each year by EPA, and which extend from the US/Mexico border to Del Mar and offshore to about the 500 m depth contour.

Sincerely,

Robo Muly For

Halla Razak Director of Public Utilities

Comments by Lisa Levin, Center for Marine Biodiversity and Conservation, Scripps Institution of Oceanography.

Offshore Aquaculture offers much promise and may eliminate some of the problems characteristic of nearshore/coastal aquaculture. However it raises many new issues as well. Below I have listed some of the key issues that need to be addressed.

I. Direct environmental impacts:

A. Physical impacts on regional flow, turbulence, sedimentation, oxygenation.

B. Biogeochemical and consequences of organic enrichment in the underlying water column and seafloor

C. Ecological consequences of organic enrichment in the underlying water column and seafloor – changes in community composition, diversity, productivity, food webs and other functional attributes.

D. Effects of noise, light, electromagnetic and other non-natural aspects associated with operations. Impacts of boat activity to and from shore.

II. Indirect environmental impacts.

A Reef effects – attraction of fish and invertebrate species to the pen structures, fish aggregations and attraction of the predators of those species.

--[if !supportLists]-->B. <!--[endif]--> B. Are there effects on or attraction of non-native species.

- --[if !supportLists]-->C. c. Impacts on long-distance migratory species (marine mammals), or local vertical migrating plankton.
- --[if !supportLists]-->D. _{D/}<!--[endif]-->Genetic impacts altered connectivity of the target or affected species. Will the site act as a larval source or sink? Will the farmed population exchange genes with resident populations?
- --[if !supportLists]-->E. E. Energy efficiency and use... what is the carbon footprint of the farmed fish.
- --[if !supportLists]-->F. <!--[endif]-->
- III. Interaction with Climate Change

A. How will environmental changes interact with secular trends in declining oxygen/ intensified CA undercurrent, increased onshore/upwelling events, ENSO, storms etc. B. Can instrumentation on the pens be used as long-term climate monitoring facilities? Or as early warning to avoid catastrophic results from changes in conditions.

C. Will kelp drifts and other debris released during storms get trapped on the pens? Are the pens stable under storm conditions?

D. Can multitrophic culturing (plants, bivalves in addition to fish) ameliorate some of the potential climate hazards such as ocean acification or hypoxia?

IV. What are the social benefits and disadvantages?

Jobs? Food availability? Competition with wild fisheries or reduced pressure on wild fisheries?

Hello,

Attached please find comments from the Center for Biological Diversity on the Rose Canyon Fisheries offshore aquaculture project. I will be sending several additional emails with the references cited in the comments attached.

A copy of the comments and cited references are also being sent via first class mail.

Cheers, Kristen

Kristen Monsell Staff Attorney Center for Biological Diversity 1212 Broadway, Ste. 800 Oakland, CA 94162 (510) 844.7100 x337 www.biologicaldiversity.org

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From:	Jim Eckman
To:	R9RoseCanyon
Cc:	Sablad, Elizabeth
Subject:	Comments regarding Rose Canyon Fisheries application
Date:	Wednesday, December 16, 2015 3:26:18 PM
Attachments:	RoseCanyon.letter.Eckman.pdf

Please see attached letter commenting on the Rose Canyon Fisheries proposal to apply for permits for an offshore aquaculture facility. Thank you

Dr. James E. Eckman Director, California Sea Grant Program University of California San Diego Scripps Institution of Oceanography 9500 Gilman Dr., 0232 La Jolla, CA 92093-0232

858-534-4440 (voice) - 858-534-2231 (fax) jeckman@ucsd.edu https://caseagrant.ucsd.edu/

From:	Ota, Becky@Wildlife
То:	R9RoseCanyon
Subject:	Corrected Rose Canyon Letter
Date:	Friday, January 15, 2016 5:20:38 PM
Attachments:	removed.txt
	image002.png
	Final Rose Canyon Ltr EPA.pdf

Hi Elizabeth,

I have attached a corrected letter. The only corrections are to the formatting of the letter.

Sincerely,

Becky

Becky Ota

Habitat Conservation Program Manager, Marine Region California Department of Fish & Wildlife

350 Harbor Blvd

Belmont, CA 94002

Office: (650) 631-6789

Cell: (650) 743-7934

Becky.Ota@wildlife.ca.gov

Every Californian should conserve water. Find out how at:



CALIFORNIA DEPARTMENT OF



COUNCIL PRESIDENT SHERRI S. LIGHTNER

CITY OF SAN DIEGO

December 15, 2015

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

Re: Support for Rose Canyon Fisheries Sustainable Aquaculture Project

Dear Ms. Sablad,

I support 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 the Exclusive Economic Zone (EEZ) off the coast of San Diego.

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.

San Diego 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 overdue and has my full support. Please contact me if I can be of assistance.

Sincerely,

Shim S. Lighten

Sherri S. Lightner

From:	<u>Robertson, Ken</u>
To:	R9RoseCanyon
Subject:	DSM Dyneema support for the application
Date:	Wednesday, January 13, 2016 12:15:15 PM
Attachments:	<u>ATT00001.txt</u>

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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.

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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. 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.

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

Sincerely,

Jey Monti

George Nardi EON Aqua, LLC

FORSTER CONSULTING Inc.

Providing Guidance & Services in Aquaculture

533 East Park Avenue, Port Angeles, Washington 98362 - 6937 U.S.A.

Tel: 360-452-7917

E mail jforster@olypen.com

December 7 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 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.

Since I am a director of Pacific Ocean Fresh Inc., a subsidiary of Hubbs SeaWorld and one of the partners in Rose Canyon Fisheries, I obviously have a natural bias in favor of the project, but it also means that I know it and the individuals involved well. I have had an association with Hubbs SeaWorld Research Institute for many years going back well before Rose Canyon Fisheries was contemplated and I am an admirer of its science and commitment to the development of responsible aquaculture here. The Institute has been a leader in US aquaculture research for many years and has done outstanding work in developing the technology to make the Rose Canyon Fisheries project feasible.

My own background in aquaculture goes back to 1965 when I started work with the UK Ministry of Agriculture Fisheries and Food. Since then I have seen the aquaculture industry grow and flourish worldwide and have been privileged to work on aquaculture projects in several countries. I have worked in the U.S. since 1984 having come here to establish salmon farming operations in Washington State and a sturgeon farm in California for Stolt Sea Farm. In 1995 I started my own aquaculture consulting business and have worked with numerous corporate and government clients since then.

Regrettably, aquaculture has not developed here as successfully as it has elsewhere in the World despite the fact that the U.S. is one of the world's largest consumers and imports of seafood. Yet we have many suitable areas of coastline, the S. Californian Bight being one of them, and we have been instrumental in developing much

aquaculture technology that is now used elsewhere in the world. It is long past time that more of it was applied here so local communities can benefit from the economic development it brings and so we can become less dependent on imports. Presently, our seafood imports comprise 86% of the seafood eaten by US citizens and lead to a negative trade balance in seafood of \$12 billion.

The Rose Canyon Fisheries project has been impeccably researched and is backed by well financed and technically experienced owners. Environmental questions have been thoroughly investigated, this work having had the benefit of years of experience in marine fish farming elsewhere in the world and in the U.S., notably salmon farming in Maine and Washington.

It is hard to think of a better or more timely project than Rose Canyon Fisheries or more qualified organizations to establish this first commercial fish farm in the S. Californian Bight. It will serve as a demonstration of the potential in the region for a substantial new industry and set the standards that others will be required to follow. It will also create many well-paying jobs both at the farm itself and in related businessess in the seafood value chain.

Therefore I hope the project will be able to move through the regulatory process with the minimum of delay so that regulatory agencies and citizens of California will have a chance to witness first hand what an excellent new opportunity this is both for the State and the Nation as a whole. I encourage you to issue a permit for it so that it may begin.

Yours sincerely

John Frich

John Forster Ph.D.

cc Don Kent, Hubbs SeaWorld Research Institute.

From:	Jaski, KC
To:	<u>R9RoseCanyon</u>
Subject:	FW: Extended Notice of Scoping for the Rose Canyon Sustainable Aquaculture Project
Date:	Friday, January 15, 2016 7:01:10 AM
Attachments:	image001.png
	image002.png
	image003.png
	image004.png
	image005.png
	EPA.Rose Canyon Fisheries Aquaculture Support.1.15.16.pdf

Please find comments from Congressman Scott Peters and Congressman Juan Vargas on the Rose Canyon Sustainable Aquaculture Project attached. A hard copy letter will be mailed to the San Francisco address as well.

Thank you, K.C.

K.C. Jaski Legislative Assistant Rep. Scott Peters | CA-52 1122 Longworth House Office Building p | 202.225.0508

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov] **On Behalf Of** R9RoseCanyon **Sent:** Tuesday, December 15, 2015 5:02 PM **Subject:** Extended Notice of Scoping for the Rose Canyon Sustainable Aquaculture Project

To All Interested Parties,

We are aware of the email issue for those trying to submit comments using the email address in the Notice below and are working to resolve the issue. In the meantime, we encourage submittal of comments using the mailing address in the Notice and are extending the comment period until **January 15, 2016**. Our website will be updated shortly to reflect this extension.

Thank you for your patience.

Notice of Scoping for the Rose Canyon Sustainable Aquaculture Project

Public Notice Date: November 20, 2015 Comment Period Closes: January 15, 2016

Pursuant to the National Environmental Policy Act (NEPA) (42 U.S.C. 4321-4307h), the Council on Environmental Quality's NEPA regulations (40 CFR Part 1500-1508), and EPA's regulations for implementing NEPA (40 CFR Part 6), EPA will prepare an Environmental Assessment (EA) to analyze the potential impacts related to the issuance of a

National Pollutant Discharge Elimination System (NPDES) permit for the Rose Canyon Sustainable Aquaculture Project. The EA will evaluate the potential environmental impacts associated with construction and operation of the proposed concentrated aquatic animal production facility. Factors that may be considered include conservation, economics, aesthetics, general environmental concerns, cultural resources, fish and wildlife, navigation, recreation, water quality, safety, and coastal impacts. The Army Corps of Engineers, the United States Coast Guard, and the National Marine Fisheries Service have agreed to be cooperating agencies as described in 40 C.F.R. Section 1501.6 of the Council on Environmental Quality's (CEQ) NEPA regulations.

Rose Canyon Fisheries, Inc. (RCF), a partnership between Hubbs-SeaWorld Research Institute and Cuna del Mar, has proposed construction of a concentrated aquatic animal production facility in federal waters, approximately 4.5 miles off the coast of San Diego, CA. The proposed project will be a commercial-scale fish farm and will be phased, initially producing 1,000 to 1,500 metric tons of fish per year, and increasing to 5,000 metric tons of fish per year by year eight. The initial fish species for production will be yellowtail jack with the option of changing fish species later to white seabass or striped bass. At the maximum capacity, the project will consist of 2 mooring structures, each with 24, 11,000 m³ submersible sea cages.

This notice initiates the scoping process by inviting comments from Federal, State, and local agencies, Indian tribes, and the public to help identify potential environmental impacts and reasonable alternatives for the EA to examine. The scoping process will inform the preparation of the EA, which will be made available for public comment.

Comments may be submitted during the comment period as follows:

Electronically: Email comments to

R9RoseCanyon@epa.gov

Mail: U.S. Environmental Protection Agency, Region 9 ATTN: (WTR-2-3)
75 Hawthorne St. San Francisco, CA 94105

NPDES application and supplemental materials available at: http://www.epa.gov/region09/water/npdes/pubnotices.html

Please bring the foregoing notice to the attention of all persons who would be interested in this matter.

From:	Huber, Michael CIV CNRSW, N40 Env
То:	<u>R9RoseCanyon</u>
Cc:	Sablad, Elizabeth; Wilson, Walter L CIV CNRSW, N40; Tymes, Melanie B SPL
Subject:	FW: Notice of Scoping for the Rose Canyon Sustainable Aquaculture Project
Date:	Thursday, December 17, 2015 1:30:34 PM
Attachments:	Navy Rose Canyon Scoping Letter 17Dec2015.pdf

Elizabeth,

Please find the attached Navy comments to this scoping notice. We look forward to working with you as this process evolves.

V/R,

Michael Huber, P.E. DoD Regional Environmental Coordination (DoDREC 9) Program Manager 937 N Harbor Drive, Box 81 San Diego CA 92132-0058 (619)532-2303, cell (619)244-2699

-----Original Message-----From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov] On Behalf Of R9RoseCanyon Sent: Friday, November 20, 2015 10:14 AM Subject: [Non-DoD Source] Notice of Scoping for the Rose Canyon Sustainable Aquaculture Project

Notice of Scoping for the Rose Canyon Sustainable Aquaculture Project

Public Notice Date: November 20, 2015

Comment Period Closes: December 21, 2015

Pursuant to the National Environmental Policy Act (NEPA) (42 U.S.C. 4321-4307h), the Council on Environmental Quality's NEPA regulations (40 CFR Part 1500-1508), and EPA's regulations for implementing NEPA (40 CFR Part 6), EPA will prepare an Environmental Assessment (EA) to analyze the potential impacts related to the issuance of a National Pollutant Discharge Elimination System (NPDES) permit for the Rose Canyon Sustainable Aquaculture Project. The EA will evaluate the potential environmental impacts associated with construction and operation of the proposed concentrated aquatic animal production facility. Factors that may be considered include conservation, economics, aesthetics, general environmental concerns, cultural resources, fish and wildlife, navigation, recreation, water quality, safety, and coastal impacts. The Army Corps of Engineers, the United States Coast Guard, and the National Marine Fisheries Service have agreed to be cooperating agencies as described in 40 C.F.R. Section 1501.6 of the Council on Environmental Quality's (CEQ) NEPA regulations.

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R9RoseCanyon@epa.gov <<u>mailto:R9RoseCanyon@epa.gov</u>>

Mail: U.S. Environmental Protection Agency, Region 9

ATTN: (WTR-2-3)

75 Hawthorne St.

San Francisco, CA 94105

NPDES application and supplemental materials available at:

http://www.epa.gov/region09/water/npdes/pubnotices.html

Please bring the foregoing notice to the attention of all persons who would be interested in this matter.



December 10, 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

Dear Ms. Sablad:

I am writing to offer our 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 am the Vice President of Aquaculture for Icicle Seafoods, Inc. Icicle Seafoods is a diversified seafood company with fishing and processing operations in Alaska and net pen aquaculture operations in Washington State. We are headquartered in Seattle. Our combined annual seafood sales amount to more than 250 million lbs of salmon (both farmed and wild), crab, halibut, pollock, cod etc. We have 250 full time employees and a seasonal staff of more than 2,100.

We own and operate the only net pen salmon farms on the West Coast of the US. Doing business under the name American Gold Seafoods since 2008, these farms have operated for more than 30 years. Although small by international standards, they have been an important contributor to commercial salmon landings in Washington State. From only 21 acres of net pens, we have represented an average of 36% of all commercial salmon landings in Washington State over the last six years. In years with low pink salmon returns, our harvests represent closer to 45% of commercial salmon landings.

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.

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

Sincerely,

ICICLE SEAFOODS, INC.

lure

Alan Cook Vice President, Aquaculture

ICICLE SEAFOODS, INC. 4019 - 21st Avenue West • Seattle, WA 98199 P.O. Box 79003 • Seattle, WA 98119 • Tel: 206-282-0988 • Fax: 206-282-7222

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 James P. McVey, Ph.D.

James P. McVey, Ph.D. Indigo Seafood LLC PO Box 1830 Lusby, Maryland 20657



December 10, 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 to offer our 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. 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.

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

Sincerely,

Langley Gace

Langley Gace President

From:	Neil Anthony Sims
To:	R9RoseCanyon
Cc:	DKent@hswri.org; amyrhammer50@gmail.com
Subject:	Kampachi Farms Comments on Rose Canyon Fisheries
Date:	Thursday, January 07, 2016 1:44:19 PM
Attachments:	image001.png
	Kampachi Farms Comments on Rose Canyon Fisheries.pdf

Please see attached.

Thanks, and aloha,

Neil

Neil Anthony Sims Co-Founder; CEO **Kampachi Farms, LLC** Ph (808) 331 1188 x 201 Cell (808) 989 2438 <u>Skype:</u> neil.anthony.sims



From:Donna LanzettaTo:Sablad, Elizabeth; R9RoseCanyonCc:dkent@rosecanyonfisheries.com; Neil Anthony SimsSubject:Letter of SupportDate:Monday, December 21, 2015 4:13:56 AMAttachments:mff letter in support rose canyon.doc

Dear Ms. Elizabeth Sablad - Attached please find letter of support regarding the Rose Canyon Fisheries permit application. Thank you. Donna Donna Lanzetta CEO Manna Fish Farm, Inc. 6 Barracuda Road East Quogue, New York 11942 631.653.9100 office 631.741.4438 mobile From:Donna LanzettaTo:Sablad, Elizabeth; R9RoseCanyonCc:dkent@rosecanyonfisheries.com; Neil Anthony SimsSubject:Letter of SupportDate:Monday, December 21, 2015 4:13:55 AMAttachments:mff letter in support rose canyon.doc

Dear Ms. Elizabeth Sablad - Attached please find letter of support regarding the Rose Canyon Fisheries permit application. Thank you. Donna Donna Lanzetta CEO Manna Fish Farm, Inc. 6 Barracuda Road East Quogue, New York 11942 631.653.9100 office 631.741.4438 mobile

To Whom It May Concern:

Please find attached LoveTheWild's letter of strong and unwavering support for Rose Canyon Fisheries, and the fantastic opportunities it brings for the US.

Sincerely, Jacqueline Claudia CEO, LoveTheWild 267-972-2715 mobile



November 19, 2016

Ms. Elizabeth Sablad Environmental Scientist US EPA Region 9 75 Hawthorne Street (NTR-5) San Francisco, California 94105

Regarding: Rose Canyon Fisheries

Dear Ms. Sablad,

I am writing in full support of the Rose Canyon Fisheries' application for a permit to farm fish in Federal waters off the coast of San Diego, California. This is an application whose time has come, as the United States verily needs offshore mari-culture development, such as the proposed Rose Canyon plan, for many reasons.

Today in the United States we are importing 91 % of our seafood, half of which is farmed. Seafood is the second largest, natural resource trade deficit, second only to oil, a trade deficit that costs our country over \$ 12 Billion dollars annually. In 2010, Congress passed the Open Ocean Aquaculture Act – and we are long overdue in ocean mari-culture development. Ocean Farming is in accord with the NOAA Strategic Plan, and will provide an urgently needed boost to our economy. Aquaculture is the most sustainable way to produce animal protein for human consumption, and we must begin farming the ocean now if we are to meet the growing demands to feed our world population.

The Rose Canyon proposed plan seeks to reduce our U.S. trade deficit, while at the same time ensuring that any impact to the marine environment is negligible. Technology has developed to support such ocean mari-culture, and it is now possible to farm seafood in the ocean in a sustainable and environmentally sensitive fashion, as has been proposed. There should be no further delay, and I urge you to approve this plan.

Respectfully submitted

DONNA LANZETTA CHIEF OPERATING OFFICER Cc: dkent@rosecanyonfisheries.com, oceanstewards@oceanstewards.org

Mark A. Snell P.O. Box 8408 Rancho Santa Fe, CA 92067-8408

December 3, 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 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. 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.

December 3, 2015 Page 2

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,

Mark A. Snell

Mr. Snell is a trustee of the Hubbs-SeaWorld Research Institute, the parent organization of Rose Canyon Fisheries. Mr. Snell is also President of Sempra Energy, a Fortune 500 energy intrastructure and utility company headquartered in San Diego, California.

From:	Neil Anthony Sims
To:	R9RoseCanyon
Cc:	DKent@hswri.org; amyrhammer@aol.com; "Kate Eagles"
Subject:	Ocean Stewards Institute comments on Rose Canyon Fisheries
Date:	Thursday, January 07, 2016 1:07:43 PM
Attachments:	removed.txt
	Ocean Stewards comments to EPA on Rose Canyon Fisheries.pdf
	OSI Water Quality White Paper 1 P FINAL.pdf

Dear Ms Sablad,

Please find attached Ocean Stewards Institute comments on the Rose Canyon Fisheries application for permits for their proposed offshore operation.

Please let us know if you have any additional questions.

Thanks, and aloha,

Neil

Neil Anthony Sims President Ocean Stewards Institute



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,

George Lee Liddle, III BS Biology - Ecology UC San Diego, 2003

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

From:	Kristen Monsell
То:	R9RoseCanyon
Subject:	RE: Comments on Scoping for Rose Canyon Aquaculture Project
Date:	Thursday, January 14, 2016 8:37:12 AM
Attachments:	80 romano 2004.pdf Amnesic Shellfish Poisoning (ASP) Washington State Dept.pdf Anderson Coastal&MarineHazards 2014.pdf Aquaculture and coastal resources.pdf aquaculture-human-health impacts-reportfinal2005.pdf

Attached is the first batch of attachments to the Center's comments.

From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:34 AM
To: 'R9RoseCanyon@epa.gov'
Subject: Comments on Scoping for Rose Canyon Aquaculture Project

Hello,

Attached please find comments from the Center for Biological Diversity on the Rose Canyon Fisheries offshore aquaculture project. I will be sending several additional emails with the references cited in the comments attached.

A copy of the comments and cited references are also being sent via first class mail.

Cheers, Kristen

Kristen Monsell Staff Attorney Center for Biological Diversity 1212 Broadway, Ste. 800 Oakland, CA 94162 (510) 844.7100 x337 www.biologicaldiversity.org

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From:	Kristen Monsell
To:	<u>R9RoseCanyon</u>
Subject:	RE: Comments on Scoping for Rose Canyon Aquaculture Project
Date:	Thursday, January 14, 2016 8:38:28 AM
Attachments:	Assessment and management of seafood.pdf
	Biodiversity response to experimental induced hypoxic-anoxic conditions in seagrass sediments.pdf
	Clin Infect Dis2009-Heuer-1248-53.pdf
	Commercial Dungeness Crab Season Opener Delayed and Commercial Rock Crab Season Closed California
	Ocean Protection Council.pdf
	CRC 2010.pdf

Attached is the second batch of attachments to the Center's comments.

From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:36 AM
To: 'R9RoseCanyon@epa.gov'
Subject: RE: Comments on Scoping for Rose Canyon Aquaculture Project

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From:	Kristen Monsell
To:	<u>R9RoseCanyon</u>
Subject:	RE: Comments on Scoping for Rose Canyon Aquaculture Project
Date:	Thursday, January 14, 2016 8:45:27 AM
Attachments:	da-seizures-in-csls.pdf
	Dozens of sea lions drown at B.C.pdf
	envpewoceanspollutionpdf.pdf
	Exposure of NARW to DA.pdf
	Gedamke.pdf
	hab_us.pdf
	Harmful Algal Blooms Along the North American West Coast Region.pdf
	Health Authorities Warn Against Eating Toxic Dungeness Crab.pdf
	Heavy Fish Farming.pdf
	lem for human and animal health and for the environment - Cabello - 2006 - Environmental Microbiology - Wiley
	Online Library.pdf

Attached is the third batch of attachments to the Center's comments.

From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:37 AM
To: 'R9RoseCanyon@epa.gov'
Subject: RE: Comments on Scoping for Rose Canyon Aquaculture Project

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Cheers, Kristen

Kristen Monsell Staff Attorney Center for Biological Diversity 1212 Broadway, Ste. 800 Oakland, CA 94162 (510) 844.7100 x337 www.biologicaldiversity.org This e-mail message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited by law. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

From:	Kristen Monsell
To:	<u>R9RoseCanyon</u>
Subject:	RE: Comments on Scoping for Rose Canyon Aquaculture Project
Date:	Thursday, January 14, 2016 8:48:07 AM
Attachments:	Marine Aquaculture in the United States Environmental Impacts and Policy Options (1).pdf mchuron-ea-et-al-da.pdf Metian - 2009 - Fishing for Feed or Fishing for Food Increasing G.pdf nihms-530873.pdf Ocean Dead Zones Are Getting Worse Globally Due to Climate Change Science Smithsonian.pdf Ocean Noise and Marine Mammals (1).pdf

Attached is the fifth batch of attachments to the Center's comments.

From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:45 AM
To: 'R9RoseCanyon@epa.gov'
Subject: RE: Comments on Scoping for Rose Canyon Aquaculture Project

Attached is the fourth batch of attachments to the Center's comments.

From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:43 AM
To: 'R9RoseCanyon@epa.gov'
Subject: RE: Comments on Scoping for Rose Canyon Aquaculture Project

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From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
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Attached is the first batch of attachments to the Center's comments.

From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:34 AM
To: 'R9RoseCanyon@epa.gov'
Subject: Comments on Scoping for Rose Canyon Aquaculture Project

Hello,

Attached please find comments from the Center for Biological Diversity on the Rose Canyon Fisheries offshore aquaculture project. I will be sending several additional emails with the references cited in the comments attached.

A copy of the comments and cited references are also being sent via first class mail.

Cheers,

Kristen

Kristen Monsell Staff Attorney Center for Biological Diversity 1212 Broadway, Ste. 800 Oakland, CA 94162 (510) 844.7100 x337 www.biologicaldiversity.org

This e-mail message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure, or distribution is prohibited by law. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

From:	Kristen Monsell
То:	<u>R9RoseCanyon</u>
Subject:	RE: Comments on Scoping for Rose Canyon Aquaculture Project
Date:	Thursday, January 14, 2016 8:52:46 AM
Attachments:	Hildebrand Noise.pdf Hites et al 2004 - Global Assessment of Organic Contaminants in Farme.pdf Hypoxia in oceans.pdf Insult to Injury.pdf Jensen et al 2015 - Detection and effects of harmful algal toxins in S.pdf Laist et al 2001.pdf like-water-and-oil-aquaculture 54029.pdf

Attached is the fourth batch of attachments to the Center's comments.

From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:43 AM
To: 'R9RoseCanyon@epa.gov'
Subject: RE: Comments on Scoping for Rose Canyon Aquaculture Project

Attached is the third batch of attachments to the Center's comments.

From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:37 AM
To: 'R9RoseCanyon@epa.gov'
Subject: RE: Comments on Scoping for Rose Canyon Aquaculture Project

Attached is the second batch of attachments to the Center's comments.

From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:36 AM
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Subject: RE: Comments on Scoping for Rose Canyon Aquaculture Project

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To:	<u>R9RoseCanyon</u>
Subject:	RE: Comments on Scoping for Rose Canyon Aquaculture Project
Date:	Thursday, January 14, 2016 8:53:37 AM
Attachments:	Pollution from fish farms "as bad as sewage" - Telegraph.pdf Review and Synthesis of the Enviro Impacts of Aquaculture.pdf Rolland Ship Noise.pdf sustainable marine aquaculture.pdf Trainer et al HAB.pdf Trophic Transfer DA.pdf Weilgart 2007 CJZ noise review.pdf West Coast Harmful Algal Bloom.pdf

Attached is the sixth, and final, batch of attachments to the Center's comments.

From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:47 AM
To: 'R9RoseCanyon@epa.gov'
Subject: RE: Comments on Scoping for Rose Canyon Aquaculture Project

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From: Kristen Monsell [mailto:kmonsell@biologicaldiversity.org]
Sent: Thursday, January 14, 2016 8:45 AM
To: 'R9RoseCanyon@epa.gov'
Subject: RE: Comments on Scoping for Rose Canyon Aquaculture Project

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To: 'R9RoseCanyon@epa.gov'
Subject: RE: Comments on Scoping for Rose Canyon Aquaculture Project

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From:	jonna.mazet@gmail.com on behalf of Jonna Mazet
То:	<u>R9RoseCanyon</u>
Subject:	Re: Extended Notice of Scoping for the Rose Canyon Sustainable Aquaculture Project
Date:	Wednesday, January 13, 2016 3:29:27 PM
Attachments:	Rose Canyon Mazet 2016.pdf

Please find my letter in response to your request for comment attached. Respectfully submitted, Jonna Mazet

Jonna AK Mazet, DVM, MPVM, PhD

Professor of Epidemiology & Disease Ecology Executive Director, One Health Institute Global Director, PREDICT Project of USAID Emerging Pandemic Threats Program

School of Veterinary Medicine University of California Vet Med 3B; 1089 Veterinary Medicine Dr. Davis, CA 95616, USA +1-530-752-7526

onehealthinstitute.net

On Tue, Dec 15, 2015 at 2:01 PM, R9RoseCanyon <<u>R9RoseCanyon@epa.gov</u>> wrote:

To All Interested Parties,

We are aware of the email issue for those trying to submit comments using the email address in the Notice below and are working to resolve the issue. In the meantime, we encourage submittal of comments using the mailing address in the Notice and are extending the comment period until **January 15, 2016**. Our website will be updated shortly to reflect this extension.

Thank you for your patience.

Notice of Scoping for the Rose Canyon Sustainable Aquaculture Project

Public Notice Date: November 20, 2015 Comment Period Closes: January 15, 2016

Pursuant to the National Environmental Policy Act (NEPA) (42 U.S.C. 4321-4307h), the Council on Environmental Quality's NEPA regulations (40 CFR Part 1500-1508), and EPA's regulations for implementing NEPA (40 CFR Part 6), EPA will prepare an Environmental Assessment (EA) to analyze the potential impacts related to the issuance of

a National Pollutant Discharge Elimination System (NPDES) permit for the Rose Canyon Sustainable Aquaculture Project. The EA will evaluate the potential environmental impacts associated with construction and operation of the proposed concentrated aquatic animal production facility. Factors that may be considered include conservation, economics, aesthetics, general environmental concerns, cultural resources, fish and wildlife, navigation, recreation, water quality, safety, and coastal impacts. The Army Corps of Engineers, the United States Coast Guard, and the National Marine Fisheries Service have agreed to be cooperating agencies as described in 40 C.F.R. Section 1501.6 of the Council on Environmental Quality's (CEQ) NEPA regulations.

Rose Canyon Fisheries, Inc. (RCF), a partnership between Hubbs-SeaWorld Research Institute and Cuna del Mar, has proposed construction of a concentrated aquatic animal production facility in federal waters, approximately 4.5 miles off the coast of San Diego, CA. The proposed project will be a commercial-scale fish farm and will be phased, initially producing 1,000 to 1,500 metric tons of fish per year, and increasing to 5,000 metric tons of fish per year by year eight. The initial fish species for production will be yellowtail jack with the option of changing fish species later to white seabass or striped bass. At the maximum capacity, the project will consist of 2 mooring structures, each with 24, 11,000 m³ submersible sea cages.

This notice initiates the scoping process by inviting comments from Federal, State, and local agencies, Indian tribes, and the public to help identify potential environmental impacts and reasonable alternatives for the EA to examine. The scoping process will inform the preparation of the EA, which will be made available for public comment.

Comments may be submitted during the comment period as follows:

Electronically: Email comments to

R9RoseCanyon@epa.gov

Mail: U.S. Environmental Protection Agency, Region 9 ATTN: (WTR-2-3)
75 Hawthorne St. San Francisco, CA 94105

NPDES application and supplemental materials available at: <u>http://www.epa.gov/region09/water/npdes/pubnotices.html</u>

Please bring the foregoing notice to the attention of all persons who would be interested in this matter.

From:	Renee Owens
To:	<u>"Richard Miller";</u> R9RoseCanyon
Cc:	d.raney108@gmail.com; "Debbie H"
Subject:	RE: San Diego Sierra Club Comments on NEPA Scoping for Rose Canyon Aquaculture Project
Date:	Friday, January 15, 2016 4:09:54 PM
Attachments:	FINAL Sierra Club comments EPA scoping Rose Canyon 2016.pdf

Editing at 3:30 AM is not recommended. I missed a couple small typos, but that bugs me so: **in case you use this document for future reference for anything, or to share, replace the last version with this one in your files.**

Renée Owens

From: Richard Miller [mailto:richard.miller@sierraclub.org]
Sent: Friday, January 15, 2016 9:20 AM
To: R9RoseCanyon@epa.gov
Cc: Renee Owens; d.raney108@gmail.com; Debbie H
Subject: San Diego Sierra Club Comments on NEPA Scoping for Rose Canyon Aquaculture Project

Please see attached letter re: San Diego Sierra Club Comments on NEPA Scoping for Rose Canyon Aquaculture Project

Please acknowledge receipt. Thank You

Richard Miller Sierra Club San Diego Development Coordinator 858-569-6005 8304 Clairemont Mesa Blvd, Ste 101 San Diego, CA 92111-1315

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Not a Member? Join at <u>http://click.linksynergy.com/fs-bin/click?</u> id=wxPd*Jh*z/E&offerid=343370.10000002&type=3&subid=0

Help us continue our good work, DONATE at <u>http://www.sandiego.sierraclub.org/home/index.asp?</u> content=joinorgive

could I get the Word doc file because I would like to add in my contact information too and use a better signature.

On Fri, Jan 15, 2016 at 4:09 PM, Renee Owens <renee@wildlifezone.net> wrote: > Editing at 3:30 AM is not recommended. I missed a couple small typos, but > that bugs me so: in case you use this document for future reference for > anything, or to share, replace the last version with this one in your files. > > >> ******* > > Renée Owens > > > >> > From: Richard Miller [mailto:richard.miller@sierraclub.org] > Sent: Friday, January 15, 2016 9:20 AM > To: R9RoseCanyon@epa.gov > Cc: Renee Owens; d.raney108@gmail.com; Debbie H > Subject: San Diego Sierra Club Comments on NEPA Scoping for Rose Canyon > Aquaculture Project > > > > Please see attached letter re: San Diego Sierra Club Comments on NEPA > Scoping for Rose Canyon Aquaculture Project > > >> Please acknowledge receipt. > > Thank You > > > Richard Miller > > Sierra Club San Diego > > Development Coordinator >> 858-569-6005 > > 8304 Clairemont Mesa Blvd, Ste 101 > > San Diego, CA 92111-1315 >

> > Not a Member? > Not a Member? Join at > http://click.linksynergy.com/fs-bin/click?id=wxPd*Jh*z/E&offerid=343370.10000002&type=3&subid=0 > > > Help us continue our good work, DONATE at > http://www.sandiego.sierraclub.org/home/index.asp?content=joinorgive

--

Debbie Hecht, Chair, Conservation Committee, Sierra Club San Diego, with 12,000 members in San Diego and Imperial Counties (808) 989-3222

Website: http://sandiegosierraclub.org/

Please join the Sierra Club at : <u>http://www.sandiego.sierraclub.org/home/index.asp?content=joinorgive</u> Jan 14, 2016

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

Don Kent, CEO of the Hubbs-SeaWorld Research Institute, is quick to claim that nothing could possibly go wrong: No marine mammals will be injured. There will be no inbreeding in the enclosure. No diseases will be spread. There will be no issues whatsoever with dumping immeasurable quantities of waste products into the ocean just off the coast of San Diego.

Not only is there no science to support this, but the evidence points to the contrary.

For the animals' good, the public's good, and for the environment's good, ask yourself and other third-party scientists and engineers: Should we take Don Kent's word? Are we 100% - or even reasonably - certain that nothing could go possibly go wrong with this project? The answer to both questions is a clear and resounding "NO!"

Please deny SeaWorld and its "private investment firm" partner their permits. Just as SeaWorld has finally been exposed to have managed captive orcas improperly, please don't let it cause further and irreversible damage by approving this high-risk and hazardous aquaculture plan.

Thank you immensely for your time, consideration, and foresight

Sincerely,

Ms. Florencia Areco Metan 2029 Salta, None 4400 +540387154491907 florare83@hotmail.com Nov 20, 2015

EPA EPA

Dear EPA,

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Sincerely,

Mrs. Eden Wild 2220 private rd. elk grove, CA 95759 (916) 687-0000 tigers2turtleswildresq@gmail.com Nov 25, 2015

EPA EPA

Dear EPA,

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Sincerely,

Ms. Elise Buffie 84 Wilmot Place Winnipeg, MB R3L 2K1 payday1@mts.net Nov 26, 2015

EPA EPA

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Miss Maria Kljuce 158 northern rd heidelberg heights Melbourne, GA 30580 m_kljuce@yahoo.com.au Nov 26, 2015

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Mrs. Meray Dedeci Marie van zeggelen str 5 Marie van zeggelen str Spijkenisse, NL 3207hp mer_inci_@live.nl

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Ms. Mariya Smetaniuk 7420 91st Ave Woodhaven, NY 11421-2822 litayu@aol.com

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Ms. Michelle Diss 12951 Janine Ct Shelby Twp, MI 48315-4736 meshel325@yahoo.com

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Mr. Jorge belloso-curiel 431 Metro Walk Way Richmond, CA 94801-3236 veganjorge@aol.com

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Sincerely,

Dr. Stockton Garver 1085 Reuben Boise Rd Dallas, OR 97338-9677 exekias@aracnet.com

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Sincerely,

Mrs. Raquel Medina thirfd street san rafael, CA 94901-3581 raquelm4@yahoo.com Nov 28, 2015

EPA EPA

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Sincerely,

Mrs. ADELA ESTUDILLO 1235 W Stella Ave Anaheim, CA 92802-3240 estudilloadela@yahoo.com Nov 28, 2015

EPA EPA

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Sincerely,

Ms. Llauren Peralta 322 Neva Pl Los Angeles, CA 90042-2707 (626) 487-7745 bodhineverdisparag@prodigy.net Nov 22, 2015

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

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Thank you immensely for your time, consideration, and foresight

Sincerely,

Mr. Ken Schliesmann PO Box 401 Holmen, WI 54636-0401 (608) 769-0848 bigdad1072878@msn.com Nov 29, 2015

EPA EPA

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Sincerely,

Mrs. Nicole Moore 2210 Quebec Ave S Saint Louis Park, MN 55426-2509 (715) 797-5129 buttercup_4nikki@hotmail.com Dec 3, 2015

EPA EPA

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Sincerely,

Mrs. annalisa maffei via betti milano, None 20151 tiramoll@alice.it Dec 4, 2015

EPA EPA

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Sincerely,

Mrs. Lynn Carin 9534 Reseda Blvd # 381 Northridge, CA 91324-2305 lady_seastar@hotmail.com Dec 4, 2015

EPA EPA

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Sincerely,

Mr. Tom Solari 2403 Oregon Ave Redwood City, CA 94061-2509 (408) 460-8530 tomsolari100@gmail.com Dec 5, 2015

EPA EPA

Dear EPA,

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Sincerely,

Mrs. Adriana Bidarra Praça José António Veríssimo nº4, 5º Dto. Póvoa de Santa Iria, None 2625-162 932206882 adrianabidarra@gmail.com Dec 5, 2015

EPA EPA

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Sincerely,

Ms. Stacy Bell 4876 Princess Anne Rd Ste 118 Virginia Beach, VA 23462-4423 designpro.sb@gmail.com Dec 7, 2015

EPA EPA

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Sincerely,

Ms. sonam sharma C-504, Sector-6, Dwarka New Delhi, None 110075 sharma.sonam1@yahoo.in Dec 7, 2015

EPA EPA

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Sincerely,

Miss Liliana Melkumyan Kulikova Astrakhan, None 414056 meliliana13@yahoo.com Dec 9, 2015

EPA EPA

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Mr. tracy rogers 3414 Angela Ln Chattanooga, TN 37419-1318 tracyrog@hotmail.com Dec 9, 2015

EPA EPA

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Sincerely,

Ms. Elizabeth Bryan 1/ Lower Boyle St MOSMAN, None 2088 bryan.elizabeth@email.com Nov 23, 2015

EPA EPA

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Sincerely,

Ms. Antoinette Gonzales 12669 Westbranch Way Victorville, CA 92392-7988 lolo.tonetone@yahoo.com Dec 10, 2015

EPA EPA

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Sincerely,

Ms. Ilana Bollag Goetzstrasse 12 Zurich, None 8006 ilana.bollag@bluewin.ch Dec 11, 2015

EPA EPA

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Sincerely,

Ms. lisa watson 1729 Pennsylvania Ave West Mifflin, PA 15122-3928 lisawatson1331@gmail.com

EPA EPA

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Sincerely,

Ms. Sally Olson 6560 Joe Michael Way Las Vegas, NV 89108-5348 sallycat@embarqmail.com

EPA EPA

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Sincerely,

Mrs. Elena Sorokina Komsomolsky prospekt 16 Moscow, PR 12710 gameover.00@mail.ru

EPA EPA

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Ms. Catherine Macan 1812 16th St Eureka, CA 95501-2564 catherinemacan707@gmail.com

EPA EPA

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Sincerely,

Ms. kliontia-kalia konstantinou palioriotissa ag.ambrosiou 1 nicosia cyprus, None 1046 96674978 aingelkalia@abv.bg Dec 13, 2015

EPA EPA

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Sincerely,

Ms. Allison Petzko 1 Dennis Ct Hightstown, NJ 08520-3016 (609) 529-7096 apetzko@gmail.com Dec 14, 2015

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

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Sincerely,

Mrs. Maria Altieri 1 Duddley Bronx, NY 10461 (347) 229-4314 maria.rutig.altieri@gmail.com Dec 14, 2015

EPA EPA

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Mrs. Gina estrada 4 résidence du Gal Leclerc Saint Louis / France, AS 68300 0033389675079 flora69@gmail.com Nov 23, 2015

EPA EPA

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Not only is there no science to support this, but the evidence points to the contrary.

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Please deny SeaWorld and its "private investment firm" partner their permits. Just as SeaWorld has finally been exposed to have managed captive orcas improperly, please don't let it cause further and irreversible damage by approving this high-risk and hazardous aquaculture plan.

Thank you immensely for your time, consideration, and foresight. It's time for Sea World to go the way of the dinosaur and become EXTINCT, while the orcas, dolphins, seals, penguins and other Marine Life goes back to the OCEANS where they BELONG!

Sincerely,

Mrs. Mary Leon 5 Loop St San Antonio, TX 78212-4231 (210) 281-5787 leon3@twc.com Dec 15, 2015

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

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Thank you immensely for your time, consideration, and foresight

Sincerely,

Ms. Wendy Li 8885 18th Ave Brooklyn, NY 11214-6001 mswendyli@aol.com Dec 16, 2015

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

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Sincerely,

Mrs. LEGRAND LEVY karoline 15 CANAL Labatut-Rivière, CA 65700 karolinemanager@orange.fr Dec 16, 2015

EPA EPA

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Sincerely,

Ms. Mercedes Howard 240 Toftrees Ave Apt 102 State College, PA 16803-2004 mercedesfreedomhoward@gmail.com Dec 17, 2015

EPA EPA

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Sincerely,

Mrs. Yamada Misato 11-31 Kitajima-cho Kadoma, None 5710026 ochanpii@ezweb.ne.jp Dec 18, 2015

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

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Sincerely,

Ms. R. Zierikzee 845 Euclid Ave Apt 4 San Francisco, CA 94118-2520 inor@earthlink.net Dec 18, 2015

EPA EPA

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Sincerely,

Ms. Crystal mathies 7920 pat at la Mesa, CA 91942 mathiesc@hotmail.com Dec 18, 2015

EPA EPA

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Sincerely,

Dr. Sherry Spurling 400 Hemlock Ct Sultan, WA 98294-9439 (520) 293-7493 sherry_spurling@yahoo.com Dec 19, 2015

EPA EPA

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As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

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Sincerely,

Ms. Deborah Talker 14, Nitya sahaya Mahim Mumbai, AK 21232 (989) 231-5454 deetalker10@yahoo.com Dec 19, 2015

EPA EPA

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Sincerely,

Ms. Lisa Haut 4 Crossland Pl Norwalk, CT 06851-5605 lisaleah13haut@gmail.com Dec 20, 2015

EPA EPA

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Sincerely,

Mrs. R. de Blaey Eendracht LEWEDORP, None 4456 r.deblaey@zeelandnet.nl Nov 23, 2015

EPA EPA

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Sincerely,

Ms. Therese Ryan 37310 36th St E Palmdale, CA 93550-2569 (661) 000-0000 mandm2872@earthlink.net Dec 20, 2015

EPA EPA

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Sincerely,

Ms. eva orlowski 192 Maverick Rd Woodstock, NY 12498-2504 (917) 463-8474 eorlowski78@gmail.com Dec 21, 2015

EPA EPA

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Sincerely,

Miss Elisabetta Tamiazzo 42 Harold road London, None Se19 3pl elisabettatamiazzo@hotmail.com Dec 22, 2015

EPA EPA

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Sincerely,

Mrs. Debbie Harris 17 Newlands Close Hastings, None Tn34 2qw debbieharris40@sky.com Dec 22, 2015

EPA EPA

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Sincerely,

Mrs. Muradiye Öztakn Ulus street 98 Denizli, VA 20160 muradiyeb@gmail.com Dec 22, 2015

EPA EPA

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Sincerely,

Mr. martin walls 38 Bluegrass Ave Middleburg, FL 32068-4710 (904) 425-1608 mow1946@yahoo.com Dec 23, 2015

EPA EPA

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Sincerely,

Ms. Irina Barcar 6935 Flowering Willow St Las Vegas, NV 89148-3812 b_irka@yahoo.com Dec 23, 2015

EPA EPA

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Sincerely,

Ms. Susan Murray 7831 SW 100th St Miami, FL 33156-2628 susanjmurray@msn.com Dec 24, 2015

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

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Sincerely,

Ms. Adrienne Estrada 685 San Pasquell St Hemet, CA 92545-2432 (951) 665-4645 adrienneestrada16@gmail.com Dec 24, 2015

EPA EPA

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Sincerely,

Mrs. Mitchell Stern 400 SE 5th Ave Apt 504 Boca Raton, FL 33432-5618 (516) 724-4811 traveltheearth@aol.com Dec 25, 2015

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

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Sincerely,

Mrs. Sonia Duffie PO Box 32155 Knoxville, TN 37930-2155 soniasduffie@hotmail.com Nov 23, 2015

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

Don Kent, CEO of the Hubbs-SeaWorld Research Institute, is quick to claim that nothing could possibly go wrong: No marine mammals will be injured. There will be no inbreeding in the enclosure. No diseases will be spread. There will be no issues whatsoever with dumping immeasurable quantities of waste products into the ocean just off the coast of San Diego.

Not only is there no science to support this, but the evidence points to the contrary.

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Please deny SeaWorld and its "private investment firm" partner their permits. Just as SeaWorld has finally been exposed to have managed captive orcas improperly, please don't let it cause further and irreversible damage by approving this high-risk and hazardous aquaculture plan.

Thank you immensely for your time, consideration, and foresight

Sincerely,

Ms. karen Perez 15013 Jonas Ave Allen Park, MI 48101-1852 karenaperez11@sbcglobal.net Dec 25, 2015

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

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Sincerely,

Mrs. Ewa Stein 18630 Van Nuys Cir Port Charlotte, FL 33948-9542 (561) 247-6112 zew777@gmail.com Dec 27, 2015

EPA EPA

Dear EPA,

As a person who cares about all animals, and one of 200,000 In Defense of Animals supporters, I am writing to urge you to prioritize ethics, science, environmental protection, and public health over corporate profits and deny SeaWorld and its Hubbs-SeaWorld Research Institute the permits it needs to move ahead with its Rose Canyon Fisheries proposal.

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Sincerely,

Ms. Irena Mikhael Topolcica 6/8 Zagreb, None 10090 iramikhael@yahoo.com Dec 27, 2015

EPA EPA

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Sincerely,

Mr. Zhenia Savenko Lepse 5 Kyiv, None 03067 zheniasavenko@gmail.com Dec 28, 2015

EPA EPA

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Sincerely,

Mrs. mika Harada izumiotsu osaka, None 5950004 mh1313@natural.zaq.jp Dec 28, 2015

EPA EPA

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Sincerely,

Dr. Kurt Amsler 128 Bv P.Puget Bandol, None 83150 0033494887946 kurt@photosub.com Dec 28, 2015

EPA EPA

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Sincerely,

Mrs. JANE HUNZIKER 438 S Venice Blvd # 3 Apt 3 Venice, CA 90291-4695 jkhunziker@gmail.com Dec 30, 2015

EPA EPA

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Sincerely,

Ms. Cinzia Moore 234 Lakeway Dr Battle Creek, MI 49037-1706 (269) 788-4468 cinziamoore@gmail.com Dec 31, 2015

EPA EPA

Dear EPA,

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Sincerely,

Mr. Georgi Vachev Bratya Miladinovi 57/1/15 Burgas, None 8000 creed777@live.com Jan 1, 2016

EPA EPA

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Sincerely,

Ms. Ana Menjivar 1324 Harvard St Santa Monica, CA 90404-2452 johnletycm@yahoo.com Jan 1, 2016

EPA EPA

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Sincerely,

Ms. Kathy OBrien 72 West Coast Rd. Redway, CA 95560 cooperhenry00@gmail.com Nov 24, 2015

EPA EPA

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Sincerely,

Mrs. Lusine Karabadzhakyan 5341 Wilkinson Ave Valley Village, CA 91607-2432 luso1989@yahoo.com

EPA EPA

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Sincerely,

Miss Lorraine Baxter 253 strathmore avenue DUNDEE, None DD3 6SP lorraine.baxter2@aol.co.uk

EPA EPA

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Sincerely,

Mr. Neville Bruce 00 No ta Notts, None 00000 ninepence@hotmail.com

EPA EPA

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Sincerely,

Ms. Marlene Phelan 39 Hunter Pl Stony Point, NY 10980-1407 (845) 893-9129 themap1@hotmail.com

EPA EPA

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Sincerely,

Mrs. Sela Sanft 359 Keating St Henderson, NV 89074-5931 (702) 581-1726 sela@alistfamilyservices.org

EPA EPA

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Sincerely,

Mrs. Barbara Garris Lange Zeile 35 Nürnberg, None 90419 barbara.garris@web.de Jan 3, 2016

EPA EPA

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Sincerely,

Mrs. Tatyana Almazova Russia Abakan, OK 65510 mjjtahdl@rambler.ru Jan 3, 2016

EPA EPA

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Sincerely,

Miss nancy KUSTYN SILKWEED CT WILMINGTON, NC 28405 nancy.jean77@yahoo.com Jan 5, 2016

EPA EPA

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Sincerely,

Mrs. pascale vlemincx katelijnsesteenweg duffel, None 2570 pavle10@hotmail.com Jan 6, 2016

EPA EPA

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Sincerely,

Miss Acantha Roux 19 Poppy Street Swartkopz Pretoria, AK 01557 azantha.roux@gmail.com Jan 6, 2016

EPA EPA

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Sincerely,

Miss ayako makishita hiragishi1-6 sapporocitytoyohiraku, None 0620931 maocce@machica.me Nov 24, 2015

EPA EPA

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Don Kent, CEO of the Hubbs-SeaWorld Research Institute, is quick to claim that nothing could possibly go wrong: No marine mammals will be injured. There will be no inbreeding in the enclosure. No diseases will be spread. There will be no issues whatsoever with dumping immeasurable quantities of waste products into the ocean just off the coast of San Diego.

Not only is there no science to support this, but the evidence points to the contrary.

For the animals' good, the public's good, and for the environment's good, ask yourself and other third-party scientists and engineers: Should we take Don Kent's word? Are we 100% - or even reasonably - certain that nothing could go possibly go wrong with this project? The answer to both questions is a clear and resounding "NO!"

Please deny SeaWorld and its "private investment firm" partner their permits. Just as SeaWorld has finally been exposed to have managed captive orcas improperly, please don't let it cause further and irreversible damage by approving this high-risk and hazardous aquaculture plan.

Thank you immensely for your time, consideration, and foresight

Sincerely,

Mrs. emme g 2a ch, None sk12er lumijulitink@gmail.com Jan 7, 2016

EPA EPA

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Sincerely,

Mr. Daniel Driver 134b Watkins Ave Woodbury, NJ 08096-5010 (609) 221-6260 old1one@hotmail.com Jan 9, 2016

EPA EPA

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Sincerely,

Mrs. Annamaria Rizzo Villaggio Sereno Brescia, None 25100 annamariar555@gmail.com Jan 9, 2016

EPA EPA

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Sincerely,

Mrs. Jacqueline Peipert 33425 Irish Ln Brighton, IL 62012-3920 jkp4194@gmail.com Jan 9, 2016

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Sincerely,

Ms. Debi Butler 98 S Highland Ave Tarpon Springs, FL 34689-5331 draebutler@aol.com Jan 13, 2016

EPA EPA

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Sincerely,

Ms. Melody Aspinas 8 rue des acacias Saint priest en jarez, AL 42270 (061) 071-9528 melody-mel@hotmail.fr Nov 25, 2015

EPA EPA

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Sincerely,

Ms. Donna Lozano 20617 Business Highway 77 Harlingen, TX 78552-4004 donna.lozano@sbcglobal.net

From:	Ota, Becky@Wildlife
То:	<u>R9RoseCanyon</u>
Cc:	Paznokas, William@Wildlife
Subject:	Rose Canyon comment Letter
Date:	Friday, January 15, 2016 5:00:01 PM
Attachments:	removed.txt
	image002.png
	Final Rose Canyon Ltr EPA.pdf

Dear Ms. Sablad,

Attached is the Department of Fish and Wildlife's comment letter on the Notice of Scoping for the Rose Canyon Sustainable Aquaculture Project. Please feel free to contact me if you have any questions.

Sincerely,

Becky

Becky Ota Habitat Conservation Program Manager, Marine Region California Department of Fish & Wildlife 350 Harbor Blvd Belmont, CA 94002 Office: (650) 631-6789 Cell: (650) 743-7934 Becky.Ota@wildlife.ca.gov

Every Californian should conserve water. Find out how at:



CALIFORNIA DEPARTMENT OF

From:	Teufel, Cassidy@Coastal
To:	Sablad, Elizabeth
Subject:	Rose Canyon Comment Letter
Date:	Thursday, January 14, 2016 3:19:00 PM
Attachments:	removed.txt
	CCC Comments - Rose Canyon Scoping Notice.pdf

Hi Elizabeth –

Please find the attached comment letter in response to the Notice of Scoping for the Rose Canyon Project. If you have any questions, please don't hesitate to contact me.

Thanks,

Cassidy

Cassidy Teufel Senior Environmental Scientist Energy, Ocean Resources and Federal Consistency California Coastal Commission 45 Fremont Street, Suite 2000 San Francisco, CA 94105-2219 (415) 904-5502; FAX (415) 904-5400 http://www.coastal.ca.gov/

?

Every Californian should conserve water. Find out how at:



From:	Matt O"Malley
To:	<u>R9RoseCanyon</u>
Cc:	Sablad, Elizabeth; Tymes, Melanie B SPL; Smith, DavidW; Kozelka, Peter; diane.windham@noaa.gov; deborah.lee@coastal.ca.gov; greg.murphy@sdcounty.ca.gov; cassidy.teufel@coastal.ca.gov; Gavaldon, Alejandra; Gibson, David@Waterboards; Sara Aminzadeh; Travis Pritchard
Subject:	San Diego Coastkeeper comments on NEPA Scoping for the Rose Canyon Aquaculture ATTN: WTR-2-3
Date:	Wednesday, January 13, 2016 1:54:13 PM
Attachments:	SD Coastkeeper EPA NEPA Scoping Comments 1.13.16.pdf Attachment 1 San Diego Coastkeeper Comments on Permit No. SPL-2014-00600-MBT.pdf Attachment 2 EPA.San Diego Pt. Loma.Pure Water letter 9.17.15.pdf Attachment 3 FINAL Coop Agreement on Pt Loma.pdf Attachment 4 Bibliography.pdf

Hello,

Attached please find our comments with attachments on NEPA scoping for the Rose Canyon Aquaculture Project.

Thank you.

Sincerely,

Matt O'Malley

--

Matt O'Malley Waterkeeper, Legal & Policy Director matt@sdcoastkeeper.org (o) 619-758-7743 x119 (c) 619-241-1894

San Diego Coastkeeper®

www.sdcoastkeeper.org

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@sd_coastkeeper

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From:	Matt O"Malley
To:	<u>R9RoseCanyon</u>
Cc:	Sablad, Elizabeth; Tymes, Melanie B SPL; Smith, DavidW; Kozelka, Peter; diane.windham@noaa.gov; deborah.lee@coastal.ca.gov; greg.murphy@sdcounty.ca.gov; cassidy.teufel@coastal.ca.gov; Gavaldon, Alejandra; Gibson, David@Waterboards; Sara Aminzadeh; Travis Pritchard
Subject:	San Diego Coastkeeper comments on NEPA Scoping for the Rose Canyon Aquaculture ATTN: WTR-2-3
Date:	Wednesday, January 13, 2016 1:53:54 PM
Attachments:	SD Coastkeeper EPA NEPA Scoping Comments 1.13.16.pdf Attachment 1 San Diego Coastkeeper Comments on Permit No. SPL-2014-00600-MBT.pdf Attachment 2 EPA.San Diego Pt. Loma.Pure Water letter 9.17.15.pdf Attachment 3 FINAL Coop Agreement on Pt Loma.pdf Attachment 4 Bibliography.pdf

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Matt O'Malley Waterkeeper, Legal & Policy Director matt@sdcoastkeeper.org (o) 619-758-7743 x119 (c) 619-241-1894

San Diego Coastkeeper®

www.sdcoastkeeper.org

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From:	Richard Miller
То:	<u>R9RoseCanyon</u>
Cc:	Renee Owens; d.raney108@gmail.com; Debbie H
Subject:	San Diego Sierra Club Comments on NEPA Scoping for Rose Canyon Aquaculture Project
Date:	Friday, January 15, 2016 9:20:20 AM
Attachments:	San Diego Sierra Club comments EPA scoping Rose Canyon 1-2016.pdf

Please see attached letter re: San Diego Sierra Club Comments on NEPA Scoping for Rose Canyon Aquaculture Project

Please acknowledge receipt.

Thank You

Richard Miller Sierra Club San Diego Development Coordinator 858-569-6005 8304 Clairemont Mesa Blvd, Ste 101 San Diego, CA 92111-1315

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Help us continue our good work, DONATE at <u>http://www.sandiego.sierraclub.org/home/index.asp?</u> content=joinorgive

From:	Schwarz, Michael
To:	<u>R9RoseCanyon</u>
Cc:	Sablad, Elizabeth
Subject:	Scoping for the Rose Canyon Sustainable Aquaculture Project
Date:	Wednesday, November 25, 2015 5:25:41 AM
Attachments:	image001.png
	EPAPublic comment Schwarz.pdf

Please see attached. Best, Michael.

Kindest regards, Michael

Michael H. Schwarz, Ph.D. VIRGINIA TECH: Adjunct Assistant Professor, FWC Aquaculture Specialist - VSAREC General Manager: Forever Oceans/Virginia Tech International Aquaculture Academy President: Quantum Tides Inc. Past-President: World Aquaculture Society Past-President: United States Aquaculture Society

102 S. King Street Hampton, Virginia. 23669 USA Tel: 1-757-727-4861 Cell: 1-757-817-1247 Fax: 1-757-727-4871 email: <u>mschwarz@vt.edu</u> SKYPE: michaelhschwarz <u>http://www.foreveroceans.com/</u>



UPCOMING EVENTS:

LATIN AMERICAN & CARIBBEAN AQ. 2015, Fortaleza, Brazil, Nov 16-19 ME & CA AQUACULTURE 2015, Tehran, Iran Dec.14 - 16 AQUACULTURE 2016 Las Vegas, Nevada USA Feb 22-26 ASIA PACIFIC AQUACULTURE 2016, Surabaya, Indonesia May 26 - 29 AQUACULTURE AMERICA 2017 San Antonio, Texas, USA Feb. 19-22 WORLD AQUACULTURE 2017 South Africa June 2017 AQUACULTURE AMERICA 2018 Las Vegas, Nevada, USA Feb. 19-22



December 8, 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,

Please accept this letter of 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 world supply of seafood is farmed. The Food and Agriculture Organization of the United Nations and the US Departments of Commerce and Agriculture recognize that Open Ocean aquaculture can significantly increase our nation's seafood production to meet the demand and increase consumption of healthy seafood products.

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. Properly designed fish farms are 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. RCF aquaculture will take the best of what we know today and improve operations as new technologies and protocols are developed, thereby ensuring that it constantly strives to set the highest standards for sustainability.

Our nation is known for fostering innovative technologies and industries that raise the standard of living for all U.S. residents. San Diego, where RCF will be operated, is a center for biotech, medical research 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. This aquaculture business will be a tremendous asset for the US Pacific coast and will demonstrate the productive capacity of marine aquaculture for US seafood consumers.

Please approve the RCF development plan to support the development of marine aquaculture in this country.

Sincerely,

Joe Hendrix, President SeaFish Mariculture Houston, Texas



December 3, 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

Dear Ms. Sablad,

I am writing to support the Rose Canyon Fisheries (RCF) application for permits from the U.S. Army Corps of Engineers (ACE) and the U.S. Environmental Protection Agency (EPA) to operate a commercial marine aquaculture facility in our nation's Exclusive Economic Zone (EEZ) off the coast of San Diego.

The U.N. Food and Agriculture Organization (FAO) estimates that food production will have to increase by 70 percent to feed the growing population while adapting to climate change and combating global hunger and poverty. Currently, more than half of the ice-free land has been modified for human use, the majority of which is used for agriculture. Agriculture production accounts for more than 70 percent of all fresh water resource use. Despite this, more than 800 million people are chronically undernourished. The ocean covers more than two-thirds of the Earth's surface, yet capture fisheries and a small marine aquaculture sector produce less than 2 percent of the global food supply. Seafood is a healthy protein source that has great potential to meet the burgeoning need for protein rich foods while minimally impacting the environment.

More than 90 percent of the seafood consumed in the U.S. is imported, resulting in an annual seafood trade deficit exceeding \$10 billion. In 2012 the U.S. contributed just over 0.5 percent to the global farmed seafood supply, while Asia produced 88 percent. Increasing wealth and rising populations in these countries will likely result in higher consumption of the seafood that they produce, leaving less available for export to major importing countries like the U.S.



The U.S. has the potential to develop a robust and diverse marine offshore aquaculture industry. In addition to our strong environmental standards, we have the largest EEZ in the world and, according to a recent report by the FAO, the most area suitable for marine aquaculture production in terms of desirable depth, current speed, and access to coastal infrastructure. The application of modern technology in cage design, mooring, feed formulation, and operations to marine aquaculture is relatively new, but successfully practiced in many parts of the world. Proper siting that accounts for current speed, depth, sensitive habitats, and competing uses coupled with best management practices can produce high quality seafood without unacceptable environmental impacts.

The U.S. has the largest agricultural economy in the world. This vital sector employs hundreds of thousands workers and feeds millions of Americans. It's essential that we turn this proficiency toward our ocean resources, to complement our existing land-based food production capability for a sustainable and secure food future.

The Rose Canyon Fisheries project is an important step toward increasing the domestic seafood supply and supporting coastal communities. I fully support this project.

Sincerely,

Kim Thompson Program Manager Seafood for the Future

December 11, 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,

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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.

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 our full support. Sincerely,

Brad andrews

Brad Andrews Chief Zoological Officer, SeaWorld Entertainment Trustee, Hubbs-SeaWorld Research Institute

December 11, 2015

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SEAWORLD PARKS & ENTERTAINMENT

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alst

Dan Brown Chief Park Operations Officer, SeaWorld Entertainment Trustee, Hubbs-SeaWorld Research Institute

SEAWORLD PARKS & ENTERTAINMENT

December 15, 2015

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

Dan Decker Park President, SeaWorld Texas Trustee, Hubbs-SeaWorld Research Institute

December 11, 2015

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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. 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.

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 our full support.

- John Mael

Park President, SeaWorld San Diego Trustee, Hubbs-SeaWorld Research Institute



December 10, 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,

On behalf of **The Maritime Alliance**, thank you for the opportunity to express our 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 off the coast of San Diego in our nation's Exclusive Economic Zone (EEZ).

According to a 2012 study, the San Diego regional **Blue Economy** includes more than 1,400 companies, 46,000 jobs and more than \$14 billion in direct annual sales. **The Maritime Alliance** is the non-profit industry association and organizer of the regional ocean and water technology community – the **BlueTech** cluster – with 19,000 jobs and \$6.2 billion of the totals and, as such, is the largest such cluster in the U.S. We focus on economic development, ecosystem development, and national/international outreach. Our sister organization, **TMA Foundation** is an educational non-profit that focuses on workforce development, research, and community outreach. Together they promote sustainable, science-based ocean and water industries.

We are big supporters of aquaculture. On a macro level we know the world's growing demand for seafood is exerting ever greater pressure on fisheries. Currently, the United States imports more than 90% of the seafood we consume, of which over 50% is farmed in locations around the world where we have no regulatory oversight. 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. So we have an opportunity to reduce the carbon footprint of seafood that we consume, create thousands of local jobs, relieve pressure on natural fisheries, produce a sustainable source of protein to meet growing demand and exert regulatory oversight over the practices and methods of aquaculture. Ms. Elizabeth Sablad December 10, 2015 Page Two

The U.S. has the largest agricultural economy in the world. This vital sector employs hundreds of thousands workers, feeds hundreds of millions of Americans, and exports extensively to help meet food needs internationally. It is time we turn this proficiency toward our ocean resources, to complement our existing land-based food production capability.

Studies published by U.S. and international researchers report that aquaculture, conducted properly, is the most sustainable way to produce animal protein for human consumption. It requires no fresh water, minimal land-based support infrastructure, and minimal energy. The RCF project will take the best of what we know today and continue to evolve as new technologies and protocols are developed, thereby helping establish the highest standards.

The Southern California Bight – the curved coastline of Southern California from Point Conception to San Diego – is one of the best locations in the world for aquaculture and has the potential to create tens of thousands of good paying jobs and billions of dollars in economic activity. **The Maritime Alliance** is working with partners to create a **BlueTech** Incubator and three national Centers of Excellence in Maritime Robotics, Water Technology and BioMarine. The BioMarine CoE will include aquaculture as an area of focus, which help support the growth of sustainable, science-based aquaculture related jobs in the region.

San Diego has historically been a mecca for commercial fishing, which continues today on a smaller scale. We recently worked with the County of San Diego, the Port of San Diego, and California Assembly Speaker Toni Atkins on Assembly Bill 229, which passed unanimously and was signed by the Governor to establish state code for the creation of Fishermen's Markets. These markets allow commercial fishermen to sell whole or eviscerated fish directly to consumers. The public response has been incredible. The Saturday-only market, which includes aquaculture sourced seafood, welcomes hundreds of people to the waterfront every week to chat with the fishermen, learn where their fish come from and how they were caught. This is vital to supporting a local sustainable supply of seafood.

We are fortunate that RCF is blazing this trail for fin-fish aquaculture in Federal waters because they understand the science and are committed to raising fish in an environmentally, economically, and responsible manner.

We respectfully request that you support the RCF project. Thank you for your consideration.

Michael Jones President

Leg Hurphy

Greg Murphy Executive Director

Office of President / CEO



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December 16, 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,

The San Diego Unified Port District (District) stands in support of the Rose Canyon Fisheries (RCF) application for permits from the U.S. Army Corps of Engineers and the U.S. Environmental Protection Agency to operate a commercial aquaculture farm off the coast of San Diego in our nation's Exclusive Economic Zone.

According to recent figures, the population of California has reached approximately 39 million. With an average seafood consumption of 14.6 pound per person in the United States, California alone will need 257,000 metric tons to provide for its per capita consumption. Over 50% of the world's supply of seafood is farmed. The Food and Agriculture Organization of the United Nations and the United States 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, nongovernmental organizations report that aquaculture, conducted properly, can provide a 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.

In San Diego, economic activities on the Port District's tidelands contribute \$748 billion to the region and support 57,194 total jobs. Maritime and industrial businesses generate \$2.07 billion, in direct economic impact and support 21,148 total jobs. As an economic engine and environmental steward, the District supports the idea of turning the proficiency of the regions experts toward the ocean's resources, to complement the state's existing land-based food production capability. The proposed Rose Canyon Fisheries aquaculture project is poised to do just that.



Ms. Elizabeth Sablad US EPA Region 9 December 16. 2015 Page 2

Our nation is 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, 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 our full support.

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Randa J. Coniglio President/CEO

WEST COAST SEAFOOD PROCESSORS ASSOCIATION

1618 SW First Avenue Suite 318 Portland, OR 97201 503-227-5076 December 10, 2015

U.S. Environmental Protection Agency, Region 9 ATTN: (WTR-2-3) 75 Hawthorne St. San Francisco, CA 94105

Ladies and Gentlemen:

The following comments regarding the scoping of the Rose Canyon Sustainable Aquaculture Project to be conducted by Rose Canyon Fisheries (RCF) are submitted on behalf of the West Coast Seafood Processors Association (WCSPA). Members of WCSPA include large and small processors of salmon, groundfish, crab, and shrimp with facilities located in Washington, Oregon, and California; associated seafood-related businesses; and various commercial fishing vessels.

RCF plans to develop an offshore aquaculture project which is projected to raise up to 5,000 mt of yellowtail jack per year at peak production, with possible substitution of white sea bass and / or striped bass. All of these species are endemic to southern California waters (striped bass is an introduced species which has become well established), are not listed under the Endangered Species Act, and are not designated as "overfished" or subject to overfishing under the Magnuson Stevens Fishery Conservation and Management Act. We therefore believe that the project will not prove detrimental to existing fisheries and in fact may enhance the continuation and development of new fish processing infrastructure. Further, the proposed location for the project does not interfere with known navigation channels or fishing grounds and is not located in any habitat areas of particular concern. In short, all of the impacts will be positive.

As a general note, there is a growing need for the development of aquaculture projects in the U.S. Nearly 80% of our seafood is now imported. Wild capture fisheries are generally stable and in the U.S. are approaching maximum sustainable yield. If we hope to feed the world – including ourselves – in the coming decades, we need to develop the most up to date aquaculture technology and infrastructure. RCF's project can be a showcase and an economic incubator to give the U.S. what it needs to be a real player in the world aquaculture industry. We therefore recommend that this project go forward.

And alone

Rod Moore Senior Policy Advisor