

**Alaska Center for the Environment
Center for Food Safety
Environmental Defense
National Coalition for Marine Conservation
National Environmental Trust
Natural Resources Defense Council
The Ocean Conservancy**

January 17, 2007

Admiral Conrad Lautenbacher
National Oceanic and Atmospheric Administration
14th Street & Constitution Avenue, NW, Room 6217
Washington, DC 20230

Dear Admiral Lautenbacher:

We are writing to express our concern over NOAA's approach to offshore aquaculture issues. Last year, the administration introduced S. 1195 to provide a regulatory framework for offshore aquaculture. One major concern of our organizations was that the bill did not require the Secretary to establish comprehensive, mandatory environmental standards for aquaculture facilities. We believe that the value of the nation's offshore waters is great and the potential risk of offshore aquaculture is substantial, and thus environmental standards cannot be optional. In light of the growth projected in the 10-year plan for aquaculture NOAA released in November, it is all the more important that the U.S. create a system that ensures the long-term protection of our ocean waters and fish populations.

We remain concerned that new legislation proposed by the administration does not require stringent environmental standards. Among other things, any legislation should: require farming only native fish with a local genotype, unless the applicant can demonstrate that the risk from another fish is negligible; prohibit the farming of genetically engineered fish; mandate comprehensive measures to prevent fish escapes and the spread of disease or parasites; prohibit the use of prophylactic antibiotics or other drugs; and limit the use of wild caught fish in aquaculture feeds. NOAA, through its Regional Fishery Management Councils, should ensure that forage fish populations are actively managed in an ecologically-sustainable manner, including all fish caught for fishmeal and aquaculture feeds. We also believe states should have the ability to review a permit and determine if it is consistent with their coastal plan under the Coastal Zone Management Act.

The recent report by the Marine Aquaculture Task Force discusses many of these and other issues in greater detail. Many states have already established measures to protect their coastal waters from aquaculture impacts, such as the environmental standards and programmatic environmental impact report required under California law. Such model laws should be the starting point for federal legislation. The development of offshore aquaculture increases

NOAA's responsibility to implement real ecosystem-based management, applying the agency's full range of authority to issues such as water quality and forage fish populations. NOAA must commit to managing the oceans as a whole, not select parts.

We appreciate the need to improve oversight of offshore aquaculture and coordinate the currently fragmented approach to permitting. Our organizations and our constituents have a stake in the future of aquaculture, as do all Americans who fish, eat fish, or simply appreciate our coastal waters. As the legislative process proceeds we will insist that any federal legislation contains the very highest standards to protect marine ecosystems and ocean activities, as well as robust procedures for transparency, stakeholder consultation, and accountability. We appreciate your consideration of our concerns.

Sincerely,

Butch Allen

Alaska Center for the Environment

Gerry Leape

NET

Rebecca Goldberg

Environmental Defense

Kate Wing

NRDC

George Kimbrell

Center for Food Safety

Pam Lyons Gromen

National Coalition for
Marine Conservation

Tim Eichenberg

The Ocean Conservancy