

## **Aquaculture Summary of Written Comments**

(Received since February 1, 2008)

Since the last Council meeting to date, written comments received on the Aquaculture Amendment include 4 e-mails (copies attached). Of those, 3 express concern that the plan does not:

- ❖ Protect essential habitat and fishing grounds by requiring buffer zones around special or fragile places
- ❖ Require compensation for use of public resources for private profit that will conflict with and possibly prevent other uses
- ❖ Have strict environmental requirements about pollution and harm to habitat and wildlife
- ❖ Specifically protect forage or bait species such as menhaden from being depleted by capping current catch levels and halting any big jump due to increased demand for them to be used as feed
- ❖ Prevent farming of endangered or threatened species and species of concern

The remaining e-mail supports aquaculture and explains a “win-win solution.”

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**From:** Jodie Watson [oceanbreeze74@animail.com]  
**Sent:** Friday, February 08, 2008 3:45 PM  
**To:** GulfCouncil  
**Subject:** Gulf Aquaculture Concerns

Dear Gulf Council,

I am very concerned about the development of commercial off-shore fish farming in the Gulf of Mexico. I am joining with the Gulf Restoration Network to express my disappointment that the Gulf Council is now rushing through a plan for ocean fish farming without enough consideration of possible impacts on our marine environment, or those who rely up it. It is the Council's charge to conserve and manage our marine resources for the benefit of the nation. The current plan is all about making money and ease of operation for the new industry, not about protecting our resources.

In particular, I am worried that the Council plan does not:

- \* Protect essential habitat and fishing grounds by requiring buffer zones around special or fragile places
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These are all extremely important issues that must be adequately addressed before any aquaculture permits are considered in the Gulf of Mexico. Allowing NOAA Fisheries to make regulations piecemeal in the future for environmental standards does not protect our public resources and the people that rely on them. I strongly urge the Council to review your developing plan for ocean fish farming very carefully before moving forward.

Sincerely,

Jodie Watson  
260 Bunker Lake Blvd7  
Andover, MN 55304

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**From:** Robert Danner [bzrogue@aol.com]  
**Sent:** Sunday, February 10, 2008 2:14 PM  
**To:** GulfCouncil  
**Subject:** Gulf Aquaculture Concerns

Dear Gulf Council,

I am very concerned about the development of commercial off-shore fish farming in the Gulf of Mexico. I am joining with the Gulf Restoration Network to express my disappointment that the Gulf Council is now rushing through a plan for ocean fish farming without enough consideration of possible impacts on our marine environment, or those who rely up it. It is the Council's charge to conserve and manage our marine resources for the benefit of the nation. The current plan is all about making money and ease of operation for the new industry, not about protecting our resources.

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Sincerely,

Robert Danner  
10961 Roger Dr  
New Orleans, LA 70127

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**From:** Absolute Engineering Group [absenggroup@yahoo.com]  
**Sent:** Friday, March 28, 2008 3:46 PM  
**To:** kristina.jackson@sierraclub.org  
**Cc:** GulfCouncil  
**Subject:** Aquaculture, Pelican, Srpg., 2008

Ms. Jackson -

I have been a Club member since the mid-'70's and a member of the Florida Aquaculture Association for about ten years. From the late '70's to the early '90's, I spent many hours in Flexcoms and the Capitol. I guess I am dated pretty much with Charles Lee and the Gluckman's, but much more of the citizen warrior, as opposed to professional lobbyist, like Charles, David and Casey.

There is a win-win solution to open ocean aquaculture (actually, mariculture). The solution derives its inspiration from terrestrial organic agriculture. So far, the nascent off-shore aquaculture industry has been almost singularly focused on near-shore finfish monoculture or in-shore mollusk monoculture. A few years ago, I attended the biennial pectinid conference in St. Petersburg and tried to make the following points:

1. No one has come close to food chain integration of free-floating truly off-shore multi-cultural, multi-species mariculture.
2. The process would begin with filter feeders, such as pectinids (scallops) and/or other mollusks, with the sequential introduction of the hierarchy of predatory species (probably 4 or 5 food chain layers) to the desired finfish, or the selective harvest of any of the intermediate species along the way.

My specialty is the design and construction of the physical infrastructure to support such a system. (As a young engineer I designed and built all manner of special oceanic structures to enable petroleum exploration and extraction in the oceans of the world; also, I have designed and built ferrocement (thin shell concrete laminate) vessels and other such structures.

The base of the multi-cultural food chain is the vastly underutilized planktonic soup of the upper few meters of the ocean's surface. Except for the emergency use, if necessary, of some form of biological mediator for the invasion of external pernicious organisms, no chemical species must be added to the ocean's waters. The floating about with the array's impact's spread over at least a thousand times its footprint would minimize the concern for impacts of the organic wastes. All processing of the harvest would be via tethered factory ships retaining 100 per cent of all harvested product, except for, perhaps, mollusk shells and chum wastes that, properly administered, would support a sport fishery peripheral to the maricultural operation.

If we take the Atlantic coast of Florida as an example, the arrays of up to 100 hectares (about 400 floating (awash) product containers tethered together) with about 5, 24/7 powered service vessels capable of repositioning the arrays when not otherwise appropriately drifting about under the influence of ambient currents, winds and waves. The operating range would be immense, except during hurricane season, in which case the range would be limited to bathymetry of 10 to 50 meters to permit the arrays to have ballast chambers flooded sufficiently for them to sink to the bottom.

Given what I have seen the folks at FAU and USF doing in marine studies, I am convinced that the technical capability exists to flesh out the scientific parameters for such a multi-cultural system to be devised. If the marine scientists can provide these parameters, I can assure you that those of my ilk can produce the physical

infrastructure to make it happen. The Florida Sierra Club could sponsor a workshop on this subject. I would be pleased to participate.

Some time just saying no is not good enough. We simply can not ignore the potential benefits of aquaculture...if it is done right.

Meanwhile, if you can, please send along some of the cogent commentary on both sides related to your recent commendable efforts to address this issue in behalf of the Club.

Cheers, Robert R. Bullard, P. E.

**Robert R. Bullard, P. E.**  
**Absolute Engineering Group, div. of Ahimsa Technic, Inc.**  
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**440 Western Road (via Lakeshore Dr., off SR 415, Samsula)**  
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**(fx) 386.427.2198**

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**From:** stewart rego [stew9811779@yahoo.com]  
**Sent:** Tuesday, March 25, 2008 8:45 PM  
**To:** GulfCouncil  
**Subject:** Gulf Aquaculture Concerns

Dear Gulf Council,

I am very concerned about the development of commercial off-shore fish farming in the Gulf of Mexico. I am joining with the Gulf Restoration Network to express my disappointment that the Gulf Council is now rushing through a plan for ocean fish farming without enough consideration of possible impacts on our marine environment, or those who rely up it. It is the Council's charge to conserve and manage our marine resources for the benefit of the nation. The current plan is all about making money and ease of operation for the new industry, not about protecting our resources.

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Sincerely,

stewart rego  
po box 402  
mineola, NY 11501

631.796.6959