



May 7, 2004

The Honorable Arnold Schwarzenegger
Governor of California
State Capitol Bldg
Sacramento CA 95814

Re: U.S. Commission on Ocean Policy
Preliminary Report Recommendations

Dear Governor Schwarzenegger:

The National Aquaculture Association (NAA) is a U.S. producer-based association dedicated to the establishment of national programs that further the common interest of our membership, both as individual producers and as members of the aquaculture industry. We are committed to the continued growth of our industry, to working with the federal government to create a climate conducive to our success, and to fostering cost-effective environmental stewardship and sustainability.

As you know, the U.S. Commission on Ocean Policy has recently forwarded to governors throughout the country a copy of the Preliminary Report reflecting the Commission's work in evaluating federal ocean policy. The Commission has solicited comments on the Preliminary Report from the states and the public. The comments are due by May 21, 2004.

On behalf of our members in your State, we respectfully offer the following points for your consideration as you prepare your own comments. In some instances, we have provided references to the pertinent recommendations or text section in the Commission Report.

- The United States of America lags far behind other countries in marine aquaculture production. We currently suffer from a \$7 billion a year seafood deficit. The federal government should expedite the development of legislation and regulations authorizing marine aquaculture in order to provide American businesses and the American workforce with an opportunity to capture a share of domestic and foreign markets in marine aquaculture products. (Report pp. 269-270)

- As noted in the Commission's Report, the aquaculture industry supports an infrastructure of feed mills, processing plants, and equipment manufacturers in addition to those directly employed in aquaculture. Related transportation, communications, technology, restaurant and retail food industry interrelations should also be considered. States are always seeking out the next drivers of economic growth, and marine aquaculture may present such an opportunity. Generating federal revenues from leasing offshore aquaculture sites ("resource rents") should not be a priority, and should not be allowed to create an impediment to establishing a viable new industry and local economic opportunity. (Report pp. xii, 66, 376; Recommendations 6-2, 22-2, 30-1)
- The Commission recognizes certain advantages presented by locating aquaculture in the Exclusive Economic Zone where user conflicts and impacts can be minimized. However, many states have vibrant, sustainable and environmentally responsible aquaculture industries currently located in nearshore waters. In some cases, these industries are invaluable to rural coastal economies harmed by the declines in wild fishery resources. With appropriate research and development support and comprehensive aquaculture planning under the CZMA these industries can continue to thrive and expand. The nearshore facilities can also contribute to the immediate expansion of aquaculture production and technology development in the U.S., while offshore technologies and permitting programs are developed. Key to the survival of this nearshore aquaculture, particularly the shellfish industry is implementing recommendations contained in Chapter 14 regarding the need to protect and improve water quality. (Report Chapter 14)
- The Commission should call upon the aquaculture industry to assist in development of ocean-related education programs, and internship, mentoring and partnering opportunities as part of efforts by the Office of Ocean Education to create professional development and career opportunities as well as general public education experiences in aquaculture. (Recommendations 8-4, 8-6 to 8-15, 8-16).
- The funding of federal research in marine aquaculture production should be directed to development of practical information required for domestic commercial production. The effective participation in funding decisions by members of the U.S. aquaculture industry should be a central component of such a funding program. (Recommendations 19-9, 22-3, 23-1, 26-7, 27-2)
- The Commission is urged to recognize the invaluable contribution of state aquaculture programs in fostering a variety of regulatory approaches and incorporating improvements to aquaculture management programs as greater experience is gained. Suggested efforts to achieve policy coordination can be productive, but federally-mandated universal facility permit standards can impede the continuing advances achieved by state programs. (Report Chapters 5, 7, Recommendations 4-10)
- Congress should amend the Magnuson-Stevens Fishery Conservation and Management Act to provide governors with an appointment position slotted for an aquaculture industry representative to the Regional Fishery Management Council. Such a position would provide much needed aquaculture industry insight to the Council in providing comments

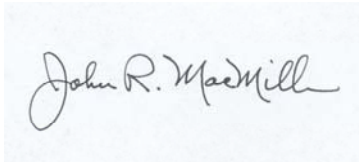
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on both aquaculture projects and the management of capture fishing programs.
(Recommendations 19-12)

- Congress should recognize the contributions made by state participants and reauthorize the Aquatic Nuisance Species Task Force. Both the NOAA and the USDA should be included in the ANSTF, and Task Force efforts coordinated with a new National Ocean Council to address marine species rather than creating a duplicative role for the National Ocean Council in the regulation of ballast water and control of invasive species.
(Recommendations 17-1, 17-3, 17-4, 17-5)
- Congress should direct enhanced coordination amongst the federal and state programs to control aquatic animal diseases and attempt to develop unified standards for commerce in marine aquaculture-raised products between states and to facilitate foreign trade.

Thank you for your consideration of these issues. Please contact us if you require additional information or if you would like to meet with aquaculture industry members in your state.

Respectfully yours,

A handwritten signature in cursive script that reads "John R. MacMillan". The signature is written in dark ink on a light blue background.

John R. MacMillan, Ph.D.
President

JRM:ml