



Gulf of Mexico Fishery Management Council

Managing Fishery Resources in the U.S. Federal Waters of the Gulf of Mexico

4107 West Spruce St Suite 200

Tampa, Florida 33607 USA

Phone: 813.348.1630 • Toll free: 888.833.1844 • Fax: 813.348.1711

www.gulfcouncil.org

DRAFT

Tab P, No. 5(c)

Updated 01/22/25

January 22, 2025

Andrew Richard

Regional Aquaculture Coordinator, Southeast Regional Office

NOAA Fisheries | U.S. Department of Commerce

Dear Mr. Richard:

Thank you for providing the opportunity to review the draft Aquaculture Opportunity Area Programmatic Environmental Impact Statement (AOA PEIS) in the Gulf of Mexico. The Gulf of Mexico Fishery Management Council (Council) appreciates the effort to identify new areas for sustainable aquaculture development and acknowledges the potential for such activities to contribute to both economic growth and food security. The following are comments and recommendations on the draft AOA PEIS.

The draft AOA PEIS is a substantial effort completed by NOAA fisheries in accordance with the Executive Order (E.O.) 13921, *Promoting American Seafood Competitiveness and Economic Growth*, and the Council appreciates the effort and thorough approach in identifying AOAs within the Gulf of Mexico (Gulf). The draft AOA PEIS provides a comprehensive look at identifying viable AOAs within the Gulf and provides a thorough comparison of potential impacts of those identified AOAs. The draft AOA PEIS is the first to apply a Marine Spatial Planning (MSP) study to identify potential AOA options across the Gulf. The use of MSP applies an ecosystem-based approach for aquaculture planning and development, which aligns with the Council's aims to advance ecosystem-based fisheries management and other ecosystem-driven management tools, and identifies areas that minimize adverse ecological, economic, and social interactions with user-groups and stakeholders.

Overall, the Council supports proposed alternatives that are least likely to disrupt current fishing practices for all sectors. The Council is appreciative of the decision to remove Atlas AOA Option C-11 (Section 2.9) given the potential for impacts to the commercial shrimp fleet and potential for interactions with ESA-species' critical use areas. The Council recognizes the preferred alternatives 2-5 (W-1, W-4, W-8, and C-3) put forth in the draft AOA PEIS (Section 2), as those that are anticipated to have the least amount of adverse impacts on all aspects of the physical, biological, socioeconomic, cultural and historical environments, and impacts to climate change.

The draft AOA PEIS identifies potential impacts to the physical and biological environment given identification of proposed aquaculture sites. A substantial concern in aquaculture operations is the impact on water quality (Section 3.2.4), such as discharging waste, excess nutrients and chemicals into the environment, and the increased potential of harmful algal

blooms and bottom-up food web interactions. Additionally, the draft AOA PEIS did not consider the impacts of storm damage and anthropogenic damage to aquaculture infrastructure. The draft AOA PEIS should identify a procedure for assessing damage to aquaculture equipment and the subsequent impacts it may have to fishing behavior, habitat, and ecosystem function in the Gulf. Should further aquaculture development take place in the Gulf, the Council recommends that specific waste management strategies be outlined to prevent negative impacts of aquaculture on the surrounding environment.

The Council reiterates the importance of identifying the impacts to the commercial fishing (Section 4.5.1), recreational fishing (Section 4.5.3), working waterfronts (Section 4.5.4), and tourism (Section 4.5.5) in coastal communities with the additional consideration of social vulnerability characteristics in the strategic planning and siting of aquaculture operations. Preferred alternatives 2-5 (W-1, W-4, W-8, and C-3), and alternative 6 (C-13) all identified coastal communities that may be impacted by aquaculture development. Additional consideration for fishing communities and stakeholders is imperative in consideration of the identified sites within the preferred alternatives for aquaculture development. The Council strongly recommends that outreach and public engagement sessions be held prior to any future aquaculture development in the identified siting locations.

Considering this is a planning document and impacts to Gulf fisheries are expected to be minimal, the Council is not identifying any specific concerns at this as related to the draft AOA PEIS. However, should the preferred alternatives proposed be brought to fruition or future aquaculture development occurs, the Council requests to receive advance notice and a presentation of aquaculture plans in the Gulf. Similarly, if future aquaculture development outside of the identified preferred alternatives within the Gulf occurs, the Council requests regular status updates and opportunities to provide comment. The Council strongly encourages the implementation of an adaptive management framework that allows for the flexibility to adjust management strategies as new data is collected and impacts are assessed over time. Such measures would ensure that aquaculture development does not inadvertently cause long-term environmental degradation or negatively impact the fish stocks or operations of sustainable fisheries.

Thank you for the opportunity to review and comment on the draft AOA PEIS. The Council reiterates their appreciation and support for the thorough approach taken in the draft AOA PEIS and commends NOAA fisheries for their substantial effort in the analysis. We look forward to hearing about any additional aquaculture planning or development.

Sincerely,

Jonathan Dugas
Council Chair