

April 11, 2011

Susan Bunsick
NOAA Aquaculture Program
1315 East-West Highway
SSMC#3-13th Floor Rm. 13152
Silver Spring, MD 20910



Re: Comments on NOAA and DOC Draft Aquaculture Policies

Dear Ms. Bunsick:

Congratulations to NOAA and the Department of Commerce for your draft policies in support of advancing domestic aquaculture production in the United States.

The U.S. Seafood trade deficit is a startling 9 billion dollars with 84% of the seafood consumed here coming from other countries and only 5% of that from domestic aquaculture production. Taylor Shellfish Farms would like to help the United States reverse this trend!

Taylor Shellfish Farms is a fifth generation family owned business. The family has been farming shellfish in Washington State since 1890. Over the past twenty years our company has grown to become the largest producer of farmed shellfish in the United States.

We have the technology and the market demand to produce far more shellfish here in the United States. We would like nothing better than to do that. Unfortunately in recent years we haven't been able to get new farms permitted to do so. Local regulations in Washington State coupled with U.S. Army Corps of Engineers permitting and NMFS and USFWS consultations have effectively prevented any new shellfish farms from getting permitted for the past four years. We have another permitting process for a suspended culture mussel farm that has drug on for fifteen years now and cost us over \$1 million.

In the mean time, consumer demand for our products continues to grow and we have been left with no choice but to purchase existing farms in British Columbia to meet it. We have invested substantially there and now have approximately one hundred employees in Canada. These are investments and jobs that could have been here in the United States. In Canada, our eyes have been opened to the potential for the growth of aquaculture when you have local, provincial (state) and federal policies and governments that embrace your industry and attempt to foster its growth. In British Columbia we have mayors soliciting us to please locate in their towns and grant programs that will pay up to 50% of the cost of new equipment for farms and processing facilities. By contrast, a couple of weeks ago one of Taylor's employees that does the permitting for our farms was told by an Army Corps employee that she was being unreasonable expecting to get a permit for a new farm in less than a year!

User conflicts arising from extensive residential growth on the shorelines are jeopardizing the future of existing farms that have been in place in some cases for more than a hundred years. These same shoreline residents are also opposing efforts to establish new farms. NOAA and Commerce could play a significant role in advancing domestic aquaculture in nearshore, state waters through a number of their existing programs. CZMA section 309 grants to do comprehensive aquaculture planning and Coastal and Marine Spatial Planning are just a couple tools that would be useful in addressing user conflicts. These tools could also potentially help mitigate the environmental degradation on our farms occurring from adjacent shoreline development.

We urge you to finalize the aquaculture policies and redouble your efforts to implement them. In particular, we recommend you implement the policies by launching a national shellfish initiative as recommended by the Pacific Coast Shellfish Growers Association, East Coast Shellfish Growers Association and the Gulf Oyster Industry Council. One of the priorities for Taylors that we hope is part of such an initiative is a comprehensive review of permitting to see if there are efficiencies that can be gained.

Taylor Shellfish Farms endorses the comments provided by the Pacific Coast Shellfish Growers Association to which we belong.

We also endorse the comments provided by NOAA's Marine Fish Advisory Committee (MAFAC). I sit on this advisory committee and helped develop the comments they provided on April 8th. In my opinion, NOAA and Commerce should pay particular deference to the MAFAC comments in that their mission is to advise the Secretary of Commerce regarding national fisheries related policy. They represent a diverse spectrum of stakeholders and have discussed aquaculture extensively for a number of years.

Taylor Shellfish Farms appreciates the opportunity to comment on your draft policies and look forward to working with you on their implementation.

Sincerely,

A handwritten signature in black ink that reads "Bill Dewey". The signature is written in a cursive, flowing style.

Bill Dewey
Public Policy & Communications Director

Cc: Jane Lubchenco, NOAA Administrator
Gary Locke, Commerce Secretary