The Honorable Wilbur Ross, Secretary
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

December 16, 2020

RE: NOAA Aquaculture Opportunity Areas, Request for Information – Alaska Letter of Support

Dear Secretary Ross,

The Alaska Fisheries Development Foundation (AFDF) recommends Alaska for your consideration as a potential Aquaculture Opportunity Area (AOA). ***Specifically, AFDF recommends appropriate Alaska state waters for the cultivation of shellfish and seaweeds to be given particular consideration in your determination of future suitability analyses for Alaska***.

In Alaska, mariculture is defined as the enhancement, restoration and farming of shellfish and seaweeds. Species include oysters, clams, mussels, geoduck, crab, sea cucumber and seaweeds (kelp). ***It is important to note that finfish farming in Alaska state waters is prohibited under Alaska Statute 16.40.210*** and is thus not included in mariculture activities in Alaska. Salmon fishery enhancement is allowed under Alaska law, but is not considered a part of the newly developing mariculture industry.

AFDF broadly represents the Alaska seafood industry, including harvesters, processors, and service sector businesses of various sizes and ownership structures. Founded in 1978, AFDF's mission is to identify common opportunities in the Alaska seafood industry and to develop efficient, sustainable outcomes that provide benefits to the economy, environment and communities. AFDF recognizes the potential and opportunity for mariculture development in Alaska. Alaska has over 30,000 miles of coastline with clean, pristine, nutrient-rich waters. In 2018, Alaska's seafood industry produced $5.6 billion in economic output, which is more seafood than the rest of the U.S. combined. The potential for increased domestic seafood production and sustained economic development from mariculture in coastal communities is profound, consequently, the potential positive impact of a designated AOA in Alaska is much higher than other U.S. regions.

Although the mariculture industry in Alaska is in its infancy (valued at $1.5 million in 2019), it is poised to experience considerable growth in the near future due to a number of factors that make Alaska an ideal place for growing shellfish and seaweed. For example, Alaska has the largest existing seafood processing infrastructure in the U.S.; Alaska has approximately

9,000 vessels registered for commercial fishing, most of which have excess capacity during the year, along with experienced operators. Seaweed is generally planted in the fall and harvested in the spring during seasonal low periods for both processors and fishermen; Alaska has the largest amount of state and federal waters, in combination with the least conflicting uses.

A recent indicator of growth for the Alaska mariculture industry is seen in the number of applications received by the state for aquatic farms in the period from 2017-2020. For example, in 2016, the state received only 4 applications. In 2017 through 2020, the state received a total of 64 applications (over 2,500 new acres). These new applications are broadly spread across the state in the following regions: Southeast, Prince William Sound, Kenai Peninsula, Kodiak and the Alaska Peninsula. Species include Pacific oysters, geoduck, blue mussels, sugar, ribbon and bull kelp

Additionally, seafood processors are showing interest in both farming and processing of mariculture species. In recent years, three applications have been submitted by two companies for a total of 307 acres, of which one application was approved for a 182-acre oyster farm near Sitka.

We appreciate this opportunity, including the investment in a Programmatic EIS, spatial analysis, site suitability studies, and additional information provided by NOAA, if selected. This would provide invaluable siting information and spatial analysis of selected waters off Alaska, identify areas of potential conflict, and garner increased public and private investment, both of which are necessary to foster the continued sustainable growth of the Alaska mariculture industry. In fact, the benefits would extend far beyond the mariculture industry in Alaska.

In closing, AFDF offers this Letter of Support for AOA designation in appropriate statewaters off Alaska for the cultivation of shellfish and seaweeds. Stakeholders have also expressed strong support for expansion of the state prohibition on finfish farming to also include federal waters off Alaska.

AFDF appreciates this initiative by NOAA and also emphasizes the organization's continued support to fund NOAA's core functions, upon which management of Alaska's sustainable fisheries is reliant. Thank you for the opportunity to provide comments on future Aquaculture Opportunity Areas and your attention to this important issue. Please do not hesitate to reach out to us directly with any questions.

Sincerely,

Julie Decker, Executive Director, AFDF

Cc: Danielle Blacklock, Director, Office of Aquaculture, NOAA

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