

MADE IN ALASKA

# MARICULTURE

Public Comment Process  
Attn: COE-2020-0002  
U.S. Army Corps of Engineers,  
CECW-CO-R, 441 G Street NW,  
Washington, DC 20314-1000.

***Re: Proposed Rule, Reissue and Modify Nationwide Permits***

To: Public Comment Processing Personnel

November 16, 2020

Thank you for the opportunity to review the Proposed Rule to Reissue and Modify Nationwide Permits (NWP). Mariculture is a rapidly growing industry in Alaska and we want to ensure the Alaska perspective is included in the national process. We have several comments and recommended changes regarding revised standards for NWP 48 and the new NWP A to consider for the public comment period. However, finfish farming is prohibited by law in Alaska and therefore we are not in support of NWP B for finfish mariculture activities in the waters off Alaska.

We support the removal of the ½ acre limit for impacts to submerged aquatic vegetation in project areas that have not been used for commercial shellfish aquaculture in the last 100 years.

We support removal of the requirement for a Pre-Construction Notification (PCN) and note that components of a PCN are required in Alaska's Aquatic Farm Lease and Permit joint-agency application. We request that the conditions in NWP 48 and A be consistent and preferably be combined into one NWP rather than separate ones for shellfish and seaweeds.

Additionally, the solicitation for comments specifically asks if only seaweed production should be considered when assessing habitat use and impacts, or whether shellfish species, such as mussels or oysters, should be included as part of a multispecies mariculture activity. We recommend including the production of all species.

Thank you again for the opportunity to provide comments on the proposed rule.

Respectfully,



Heather McCarty, Co-Chair, Alaska Mariculture Task Force

Cc: Alaska Mariculture Task Force