



WASHINGTON STATE DEPARTMENT OF
Natural Resources
Peter Goldmark - Commissioner of Public Lands

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April 8, 2011

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

SUBJECT: US Department of Commerce Draft Aquaculture Policy
NOAA Draft Aquaculture Policy

Dear Ms. Bunsick:

Thank you for the opportunity to provide comments on the draft National Oceanic and Atmospheric Administration and U.S. Department of Commerce policies for aquaculture. The Washington State Department of Natural Resources manages about 2.6 million acres of state-owned aquatic lands, virtually all the bedlands of navigable waters are state-owned, as are 30 percent of the tidelands and 75 percent of freshwater shorelands in the state. For more than a hundred years, the state Department of Natural Resources (DNR) and its predecessor has offered leases to support growing oysters, clams, fin fish, and mussels using a variety of growing methods, including: bottom, bag, floating and intertidal long line floating net pens, and floating shellfish rafts. Aquatic leases for aquaculture support the local economy, pay for management and restoration of state aquatic lands, and provide nationally recognized abundant seafood. DNR is committed to managing the state's aquatic lands sustainably for future generations. Our specific comments follow.

National Oceanic and Atmospheric Administration Draft Aquaculture Policy

DNR supports the draft aquaculture policy proposed by the National Oceanic and Atmospheric Administration (NOAA). The draft addresses NOAA's multiple stewardship missions and broader social and economic goals, which include healthy oceans, and resilient coastal communities and economies. We support the following statements in particular:

- Enable sustainable aquaculture that provides jobs, products, and services and that is in harmony with healthy, productive, and resilient marine ecosystems, compatible with other uses of the environment and National Ocean Policy (statement 1).
- Ensure agency aquaculture decisions protect wild species and healthy, productive, and resilient coastal and ocean ecosystems, including the protection of sensitive marine areas (statement 2).
- Advance scientific knowledge concerning sustainable aquaculture, and make timely decisions and unbiased aquaculture management decisions based on upon the best scientific information available (statements 2 and 3).
- Support innovation and investments that benefit the nation's coastal ecosystems, communities, seafood consumers, industry and economy (statement 4).
- Advance public understanding of sustainable aquaculture practices, and the environmental, social, and economic challenges and benefits (statement 6).



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- Work with federal partners to provide resources and expertise, and work internationally to learn, and demonstrate examples of safe and sustainable aquaculture, and encourage the worldwide adoption of sustainable practices and systems (statements 7 and 8).
- Support the integration of federal, state, local, and tribal priorities into marine aquaculture siting and management and ensure development is considered within other existing and potential marine uses to reduce potential conflicts (statement 9).

NOAA Aquaculture Priorities for Action

DNR supports the proposed priorities for action to implement the policy, and looks forward to collaborative efforts with federal partners and others. With respect to compatibility with other uses, DNR would like to bring attention to our support of the policies to:

- considering the preferences of states with respect to aquaculture development in federal waters, including tools to reduce conflicts between competing uses and identify activities for potential co-location with aquaculture operations, in the context of regional and national coastal and marine spatial planning activities. Washington state is preparing for marine spatial and planning, and pursuing non-state funding to advance this work.
- Facilitating discussions as early as possible among interested parties, including state agencies, regarding project planning and development.
- Provide consistency among state and federal entities for use authorization and permit terms.

U.S. Department of Commerce Aquaculture Policy

DNR also supports the proposed US Department of Commerce Aquaculture Policy. We support the following policy statements in particular:

- support and foster environmentally sound and sustainable aquaculture while conserving aquatic resources (statements 1 and 2);
- advance scientific knowledge, development and application of technologies and methods that provide economic and/or ecological value by enhancing or restoring depleted, threatened, and endangered wild fish stocks and restoring habitat (statements 3 and 4);
- work collaboratively with federal, academic and business partners to support development of sustainable aquaculture, including promoting cooperative research with other nations, including addressing impacts of aquaculture that breach international boundaries (statements 6 and 7);
- Advance public understanding of sustainable aquaculture and the associated environmental, social, and economic benefits and challenges (statement 8).

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DNR welcomes the opportunity to work with others in support of sustainable aquaculture that may affect state waters. In that regard, we suggest that policy statement 6 be broadened to recognize the importance of including the states in your collaborative efforts.

DNR supports the proposal to work in partnership with others, including states, tribes, and stakeholders, to implement the policies.

Should you have any questions regarding these comments, please do not hesitate to call Cyrilla Cook, at 360 902-1080.

Sincerely,



Kristin Swenddal, Manager
Aquatic Resources Division

c: Cyrilla Cook, Policy Unit Supervisor