



Mr. Phil Anderson, Chair  
Pacific Fishery Management Council  
1100 NE Ambassador Place, #101  
Portland, Oregon 97220

October 2, 2018

RE: Potential Finfish Aquaculture Project Offshore San Diego

Dear Chairman Anderson and Council Members,

The San Diego Fishermen's Working Group (SDFWG) was formed to provide a unified voice to commercial fishermen of all gear types in the greater San Diego region. We are a 501-c-3 non-profit organization, purposed to bring the collective views of commercial fishermen to fisheries science and management, and to any public process that may impact the success of our fisheries. The SDFWG is lead by a nine person Board of Directors (Board), representing the various important gear types and fisheries in the region.

Members of the SDFWG Board, along with other participants in San Diego's commercial fishing community, attended a presentation on August 20, 2018, at the Hubbs/Sea World facility on Mission Bay. We were invited by representatives of an investment group seeking to create a permanent, large-scale fish farm, Pacific Ocean Aquafarms, in federal waters three miles off the coast of San Diego, near La Jolla's Bird Rock community.

During the presentation, speakers from the proposed Pacific Ocean Aquafarms, NOAA and the San Diego Port District, presented visual and verbal descriptions and details of the proposed project. We appreciated the outreach to us, which can help us form an opinion about the yellowtail fish-pen project.

There was also an effort to place the proposed project into a broader context of aquaculture and US imports. Specific to the Pacific Aquaculture Farms proposal, many fishermen offered comments, expressing serious concerns about its location. Among the concerns were the loss of

important fishing grounds, that the project would spill over into surrounding waters, is highly likely to attract sea lions, and have unknown and possibly negative effects on the recently created South La Jolla Marine Protected Areas.

The SDFWG must object to the proposed location of this finfish aquaculture project. Loss of this area will have direct impacts on fishermen using gear for lobster, halibut, white sea bass, yellowtail, various groundfish, and coastal pelagic species. The proposed area contains quality rock structure habitat—the kind fishermen value for its productivity. There is also the likelihood that sea lions will be attracted to the penned fish, so fishermen using nearby waters will suffer more sea lion interactions, including a loss of catch and gear. Pollution is possible from feed and waste from the pen, which may be carried by currents into the South La Jolla Marine Protected Area.

The SDFWG cannot support this proposed location and recommend that the proponents find a new location that is at least seven miles from shore and is no shallower than the 75 fathom federal boundary line, as detailed in 50 CFR, Part 660.72, SUBPART C.

The SDFWG hopes that the Pacific Fishery Management Council will consider our concerns when the proposed Pacific Ocean Aquafarms project comes before the Council for review.

Pete Halmay

President

Cc Don Kent, Pacific Ocean Aquafarm

Paula Sylvia, San Diego Port District