

MADE IN ALASKA

# MARICULTURE

To: Shannon Morgan, North Branch Chief, USACE  
[Shannon.R.Morgan@usace.army.mil](mailto:Shannon.R.Morgan@usace.army.mil)

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

Dear Ms. Morgan:

November 03, 2020

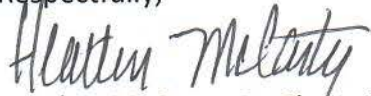
Thank you for the opportunity to provide recommendations for regional conditions on the Proposed Rule to Reissue and Modify Nationwide Permits (NWP). Mariculture is a rapidly growing industry in Alaska and we want to ensure the State of Alaska's perspective is included in the process. We have several recommended regional conditions to consider for the public comment period. The first and foremost, finfish farming is prohibited by law in Alaska, therefore we are not in support of NWP B for finfish mariculture activities in the waters off Alaska.

We are requesting a regional condition for the use of appropriate criteria in assessing marine mammal interactions such as potential for entanglement, competition for space, and proximity of farms to pinniped haulouts to determine if Section 7 consultation is necessary. This would align regional conditions with the standards implemented on State issued permits.

We request a condition that a preliminary determination on a state lease/permit application is received by the applicant prior to submission of a USACE permit application and that all permit authorizations in Alaska be issued under NWP 48 or A.

Thank you again for the opportunity to provide recommendations for regional conditions on the proposed rule.

Respectfully,



Heather McCarty, Co-Chair, Alaska Mariculture Task Force

Cc: Alaska Mariculture Task Force