Message

From: Ferry, Rol [Ferry.Roland@epa.gov]
Sent: 12/3/2019 3:48:59 PM
To: Wahlstrom-Ramler, Meghan [Wahlstrom-Ramler.Meghan@epa.gov]
Subject: FW: Comments on Vellella Epsilon

I'm assuming this comment letter was sent to HQ.

From: Molloy, Jennifer <molloy.jennifer@epa.gov>
Sent: Tuesday, December 3, 2019 10:14 AM
To: Afghani, Jim <Afghani.Jim@epa.gov>; Alicia Caporaso <alicia.caporaso@boem.gov>; Andrew Engle <andrew.m.engle@uscg.mil>; Ann Glazner (ann.glazner@boem.gov) <ann.glazner@boem.gov>; Anthony Sciullo <anthony.r.sciullo@uscg.mil>; Arie Kaller (arie.kaller@boem.gov) <arie.kaller@boem.gov>; Bastian, Robert <Bastian.Robert@epa.gov>; Bernadette Thomas <bernadette.thomas@boem.gov>; Brad Crosson <steven.b.crosson@usace.army.mil>; brianne.e.mcguffie@usace.army.mil; Brin Miller <brin.a.miller.ctr@mail.mil>; Chris Smith <charles.smith.7@us.af.mil>; Collin Sykes <collin.t.sykes@uscg.mil>; Craig Litteken <craig.j.litteken@usace.army.mil>; David Dale <david.dale@noaa.gov>; Derek Stotts <derek.stotts@us.af.mil>; Doug Peter <douglas.peter@bsee.gov>; Dylan Hendrix <dylan.c.hendrix@usace.army.mil>; Erin O'Reilly <erin.o'reilly@boem.gov>; Ferry, Rol <Ferry.Roland@epa.gov>; Gene Stratton <Allen.E.Stratton@uscg.mil>; George Detweiler <george.h.detweiler@uscg.mil>; Hayley Karrigan <hayley.karrigan@boem.gov>; Heather Blough <heather.blough@noaa.gov>; James Morris <james.morris@noaa.gov>; Jennifer Lee <jennifer.lee@noaa.gov>; Jeri Wisman <jeri.wisman@boem.gov>; Jess Beck <jess.beck@noaa.gov>; Jessica Powell <jessica.powell@noaa.gov>; Jim Casey <james.casey.ctr@navy.mil>; Joel Bader <joel_bader@fws.gov>; John Averett (john.averett@us.af.mil) <john.averett@us.af.mil>; John Fellows <john.p.fellows@usace.army.mil>; Katheirne Segarra <katherine.segarra@boem.gov>; Kathleen Hartman <kathleen.h.hartman@usda.gov>; Katy Damico <katy.r.damico@usace.army.mil>; Ken Riley <ken.riley@noaa.gov>; McMillan, Kristi N CIV USARMY CESWG (US) <kristi.n.mcmillan@usace.army.mil>; Laura Knoll <laura.b.knoll@uscg.mil>; Leah O'Donnell <leah.o'donnell@boem.gov>; Madonna Montz <madonna.montz@boem.gov>; Mark Belter <mark.belter@boem.gov>; Mark Sramek <mark.sramek@noaa.gov>; Martin Mayer <martin.s.mayer@usace.army.mil>; Matthew Cutchen <matthew.cutchen@navy.mil>; Max Mayeaux <mmayeaux@nifa.usda.gov>; Michael Pierno <Michael.R.Pierno@uscg.mil>; Michele Daigle <michele.daigle@boem.gov>; Michelle Picou <michelle.picou@boem.gov>; Mike Celata (michael.celata@boem.gov) <michael.celata@boem.gov>; Odarious Chambers <odarious.chambers@navy.mil>; Patrick Powers <patrick.e.powers@navy.mil>; Paul Lehmann <paul.d.lehmann@uscg.mil>; Rich Malinowski <rich.malinowski@noaa.gov>; Sally Curran <sally.curran@us.af.mil>; Stephen Andrews <stephen.w.andrews@usace.army.mil>; Steve Sample <steven.j.sample4.civ@mail.mil>; Susan Bunsick <susan.bunsick@noaa.gov>; Tyler, Kip <Tyler.Kip@epa.gov>; William Durig <william.durig@navy.mil>
Subject: Comments on Vellella Epsilon

Here's a link to the article Jess mentioned: https://www.heraldtribune.com/opinion/20191129/guest-column-off-sarasotas-coast-new-industrial-threat

Below is a copy of the form letter.

Jenny Molloy
U.S. EPA
Water Permits Division
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molloy.jennifer@epa.gov

I was alarmed to hear that the EPA is preparing to approve a National Pollution Discharge Elimination System Permit for Velella Epsilon, a marine finfish aquaculture facility in the Gulf of Mexico. I am writing to voice my opposition to this facility, and to marine finfish aquaculture everywhere. Please deny the NPDES permit and, in light of the importance of this issue, hold a public hearing with the opportunity for public comment before reaching a decision on the permit.

These underwater feedlots are bad news all around. They are horrible for the environment and public health. They can cause massive, catastrophic fish spills -- like the release of more than 263,000 Atlantic salmon from a floating feedlot in Washington State in 2017 -- which spread disease, risk genetic degradation, and create unnecessary competition with our already struggling native fish stocks. They attract and harm predators and other wildlife. They are corporate-driven, which only means higher profits at the expense of sustainable operations and quality products. These factory farms are leading to the demise of our wild fishing communities and related industries by placing downward pressure on fishing prices and creating competition for limited marine space.

Moreover, these industrial fish farms directly discharge a whole host of pollutants into public waters aside from spilling farmed fish, including anti-foulants, excess feed, and untreated fish waste. To grant a Clean Water Act NPDES permit for this industry is folly.

Despite Velella Epsilon's proposed plan to operate a "small-scale" pilot facility, it has made clear that it will concurrently seek a commercial permit for a larger, commercial operation. Approving the draft NPDES permit would open the floodgates to massive fish farms, and put our Gulf waters and coastal communities at significant risk.

The EPA is charged with protecting our environment. Permitting industrial ocean fish farms contradicts each aspect of your mission. The agency has the responsibility to hold a public hearing with the opportunity for public comment prior to making a decision on the permit. I also urge you to consider the vastly negative public opinion when it comes to this industry and deny the NPDES permit to Velella Epsilon. Please do everything you can to stop the industrialization of our oceans with factory fish farms.