



June 17, 2026

Admiral Kevin Lunday
U.S. Coast Guard
2703 Martin Luther King Jr. Avenue SE
Washington, DC 20593

via www.regulations.gov

Re: Draft Programmatic Environmental Impact Statement for the Shipping Safety Fairways and Associated Vessel Routing Measures Along the Atlantic Coast; Docket Number USCG-2023-0928 and Docket Number USCG-2019-0279.

Dear Commandant Lunday:

Stronger America Through Seafood (SATS), a coalition representing companies across the seafood supply chain, supports increased U.S. production of healthful, sustainable, and affordable seafood. In particular, SATS supports the expansion of aquaculture in U.S. federal waters. We submit the following comments for your consideration regarding the U.S. Coast Guard's proposal to develop Shipping Safety Fairways and Associated Vessel Routing Measures Along the Atlantic Coast. SATS objects to the creation of broad and exclusive navigational fairways in the Gulf of Maine and other areas along the eastern seaboard in the Atlantic Ocean. SATS supports the "No Action" alternative in the draft PEIS.

The Proposed Fairways are Overly Broad

The Fairways proposal seeks to establish shipping safety fairways and related vessel routing measures along the Atlantic coast, from Long Island, New York to Port St. Lucie, Florida to preserve safe and reliable transit of vessels along well-established traffic patterns and routes and to further improve navigation safety.

These fairways would likely have the effect of preventing all or most open ocean aquaculture development on the Eastern seaboard, with the Gulf of Maine being the first in a line of proposed fairways. SATS opposes this overly broad attempt to foreclose important ocean uses such as open ocean aquaculture.

The proposed fairway configuration, particularly Fairway Zones 2 and 3, would materially impair or effectively foreclose commercially viable open ocean aquaculture development across much of the Gulf of Maine federal waters region. The proposal does not merely reduce siting flexibility; it entirely removes the functional siting options for open ocean aquaculture in federal waters by converting the region's limited viable footprint into an exclusionary Fairways navigation area.

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healthful, sustainable, and affordable seafood.*

In practical terms, the Coast Guard's Fairways proposal operates as a de facto prohibition on open ocean finfish aquaculture development in the Gulf of Maine, not through explicit regulatory language but through the complete elimination of the physical and engineering conditions required for the deployment of aquaculture farming systems.

The proposal is not necessary and advances no legitimate governmental interests. Further, it is substantially broader than necessary to achieve the alleged navigational-safety objectives. The imposition of fixed routing measures or broad spatial exclusions eliminates the ability to tailor solutions to real world conditions. Such restrictions remove large areas of federal waters from consideration of other uses regardless of whether a specific project could be safely designed, conditioned, or operated within them. This approach sacrifices nuance, forecloses reasonable alternatives, and shifts the burden on developers and regulators alike.

Sound administrative practice requires agencies to pursue the least restrictive means reasonably available to achieve their objectives while minimizing interference with other federally authorized ocean uses. The Coast Guard's proposed Fairways do not meet this standard and instead seek to eliminate coequal uses of federal waters for an undefined navigational benefit.

The USCG ignores the substantial technological advancements that already support coexistence on these waters without the need for the broad exclusionary zones that the Coast Guard's Fairways proposal would create. The Coast Guard appears to not have adequately evaluated narrower corridors, modified alignments, buffer systems, dynamic routing, seasonal management approaches, or other coexistence mechanisms that could reasonably accommodate both navigation and open ocean aquaculture development in federal waters of the United States.

Indeed, today there are sophisticated modeling tools that allow for siting of aquaculture farms in areas that minimize user conflicts and avoid highly traversed shipping lanes. NOAA's Office of Aquaculture is in the process of identifying Aquaculture Opportunity Areas (AOAs) in federal waters using these very tools. It is not necessary to reserve vast ocean areas primarily for speculative future transit flexibility while excluding most other ocean uses such as domestic aquaculture production in the EEZ.

The PEIS Underestimates the Economic Harm to Open Ocean Aquaculture

The Draft PEIS frames the Proposed Action as an action that "may benefit ocean aquaculture" by helping developers avoid routing measure areas, but this characterization inaccurately presents a significant new restriction as a positive outcome. Characterizing the Fairways as a "benefit" minimizes the real, foreseeable negative impacts on project feasibility and investment decisions.

The Coast Guard vastly underestimates the impact of the Proposed Action to open ocean aquaculture relative to the No Action Alternative. The draft PEIS fails to account for these important economic considerations of projects currently under development for the Gulf of Maine and aquaculture projects in development in other areas in the Atlantic in the U.S. EEZ.

For example, Blue Water Fisheries has invested substantial time, resources, and technical effort into project siting and design, and currently has an active permit application before the US Army Corps of Engineers (USACE), New England District, and the US Environmental Protection Agency, Region One (USEPA). Other farmers have been working for years to navigate an expensive, burdensome, lengthy regulatory process in the Gulf of Maine and in other areas in the Atlantic. In practice, the establishment of Fairways removes large areas of federal waters from consideration for other uses, increases siting uncertainty, and shifts risk and cost onto farmers who must redesign projects, relocate infrastructure, or abandon otherwise viable sites.

Leaving this inaccurate characterization uncorrected undermines the integrity of the environmental analysis, obscures the true scope of potential impacts, and impairs decisionmakers' ability to evaluate reasonable alternatives that would avoid or reduce conflicts with established federal permitting processes.

The PEIS Fails to Consider the Economic Benefit of Open Ocean Aquaculture

Open ocean aquaculture is an integral component of a sustainable ocean economy. Aquaculture is one of the fastest growing, most sustainable forms of food production in the world and has the unique potential to improve American food security and nutrition, enhance coastal resilience, create quality jobs, help restore species and habitats, and ensure that seafood (both wild-caught and farmed) continues to be an important part of the global food supply. According to a 2024 report “Economic contribution of U.S. aquaculture farms” (Kumar 2024), open ocean aquaculture would generate an additional \$877 million towards the U.S. economy, create thousands of jobs across the seafood supply chain, revitalize portside infrastructure, and establish new markets for U.S. farmers who supply sustainable fish feed ingredients.

Today, the U.S. ranks 20th in global aquaculture production. We import up to 85% of the seafood we consume – half of which is estimated to come from aquaculture producers in other countries, particularly countries in Asia. Expanding open ocean fish farming into U.S. waters will increase our supply of American-raised seafood as a sustainable complement to America's wild capture fisheries and would help to ensure a vibrant and competitive American seafood industry.

In a 2025 report released by The World Wildlife Fund and the World Bank, *Harnessing the Waters: A Trillion-Dollar Investment Opportunity in Sustainable Aquaculture* (World Bank, 2025), researchers identified aquaculture as one of the most promising opportunities to build a sustainable global food system over the next 25 years. The report projects that aquaculture could generate 22 million new jobs by 2050 and represents a \$1.5 trillion investment opportunity.

Further, expanding open ocean aquaculture is vital to food security, and therefore, national security. According to a U.S. Department of Homeland Security report, *Threats to Food and Agriculture Resources* (DHS, 2021), U.S. dependency on foreign seafood creates an economic and food supply vulnerability. Open ocean aquaculture in the U.S. EEZ will substantially advance domestic seafood production, strengthen food-supply resilience, reduce dependence on imported seafood, reduce the national seafood deficit, and support the strategic national interest in expanding United States aquaculture capacity.

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In May of 2020, President Trump released *Executive Order 13921 Promoting American Seafood Competitiveness and Economic Growth* that detailed the importance of improving American competitiveness in the global seafood market through expanding open ocean aquaculture. This Executive Order remains in effect. The creation of these overly broad fairways would effectively foreclose open ocean aquaculture and, as such, is in direct conflict with the Executive Order.

SATS urges you to take the “No Action” alternative in regard to the creation of these fairways. The U.S. must not foreclose the expansion of aquaculture in federal waters by preventing commercially viable open ocean aquaculture development across much of the Gulf of Maine and down the eastern seaboard.

Thank you for the opportunity to comment.

Sincerely,



Tyler Sclodnick
President

References

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U.S. Department of Homeland Security. *Threats to Food and Agriculture Resources*, 2021, https://www.dhs.gov/sites/default/files/publications/threats_to_food_and_agriculture_resources.pdf.

U.S. President. Executive Order 13921: "Promoting American Seafood Competitiveness and Economic Growth." *Federal Register*, vol. 85, no. 92, 12 May 2020, pp. 28471-28477.

“World Bank. 2025. Harnessing the Waters: A Trillion Dollar Investment Opportunity in Sustainable Aquaculture. © World Bank. <http://hdl.handle.net/10986/43575> License: CC BY-NC 3.0 IGO.”