

MEMORANDUM FOR: NOAA NEPA COORDINATOR

FROM: Danielle Blacklock, Director, NOAA Fisheries - Office of Aquaculture

TO: The File

SUBJECT: Notification of New End Date for North Central Gulf of Mexico, Integrated Multi-trophic Aquaculture Demonstration, Research Training and Outreach Environmental Assessment (GOM IMTA EA)

1. The National Oceanic and Atmospheric Administration's (NOAA's) Policy and Procedures for Compliance with the National Environmental Policy Act and Related Authorities (NOAA Administrative Order (NAO) 216-6A and Companion Manual) establishes NOAA's policy and procedures for compliance with the National Environmental Policy Act and Council on Environmental Quality (CEQ) guidance (40 CFR 1500-1508). On June 3, 2023, The Fiscal Responsibility Act (FRA) made changes to NEPA and its implementation, including time limits for NEPA documents. At that time, NOAA was completing an Environmental Assessment (EA) for the North Central Gulf of Mexico, Integrated Multi-trophic Aquaculture Demonstration, Research Training and Outreach (GOM IMTA EA). The FRA Section 107(g)(1)(B) establishes mandatory time limits for EAs, to be completed not later than 1 year after the date (as applicable) on which the agency determines that Section 106(b)(2) requires the preparation of an EA.
2. Submission of the "Report a Major Federal Action" form for this project occurred on January 19, 2023. On September 9, 2023, a memo was submitted to the NOAA NEPA Coordinator with a new completion date for the EA of July 30, 2024. The rationale for the extension was based on the need for the applicants to collect additional data in order to identify a geographic site suitable for deployment of the IMTA structure.
3. The federal action associated with this project is NOAA's financial assistance award, NA20NMF4540293, to the Gulf States Marine Fisheries Commission (GSMFC), for a series of activities associated with planning and establishing IMTA farm project in the Gulf of Mexico in state waters. The project and process is unique because NOAA is not the permitting agency. Permits and authorizations are required for the project to be undertaken and for funding to be expended. As such, this memo highlights issues related to the action as well as inter-agency process that have contributed to the timeline extension. The rationale presented in this memo is unique to this project and NOAA's role of funding the project.
4. Further delays have occurred. The Applicant experienced additional delays collecting and analyzing the field information needed for geographic site selection. This resulted in the Applicant changing the potential location of the structure, with follow on effects to the scope of the EA. The engineering analysis for the IMTA structure was not completed until February 2024. This resulted in a shift in the design of the mooring and anchoring system. The Applicant did not complete an operations plan until October 2024, with follow on effects to the scope of the EA.
5. The Applicant did not apply for a Rivers and Harbors Act Section 10 permit from the USACE until September 2024. The USACE public review period for the Section 10 permit was not completed until January 2025. Up until that time, confirmation of site selection and operational information was not available and it was unclear whether NOAA Fisheries and USACE would issue joint or separate NEPA documents.

6. Once all necessary information was received, the EA had to be significantly revised. Delays resulted in modifications and delays to consultation with the Services on protected species and habitats. Further delays have been associated with contracting. The contracting company responsible for drafting the EA departed in December 2023. Due to security clearance, a new contractor did not start until May 2024. This contractor was unable to make any progress on the EA and stopped work on the project in October 2024, at which point another contractor became involved.
7. The new end date for the EA is January 14, 2026. This corresponds to one year following the date the NOAA was notified of the USACE's intention to issue a permit for deployment of the IMTA structure at a specific location and under the final operations plan.
8. The point of contact on this matter is Dr. Phaedra Doukakis at email:  
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