



Mid-Atlantic Fishery Management Council
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Richard B. Robins, Jr., Chairman | Lee G. Anderson, Vice Chairman
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June 28, 2016

Comments on New York EA
BOEM Office of Renewable Energy Programs
45600 Woodland Road, VAM-OREP
Sterling, Virginia, 20166

Dear Sir/Madam:

Please accept these comments from the Mid-Atlantic Fishery Management Council (Council) on the Environmental Assessment (EA) that was prepared to consider the impacts of the Atlantic Outer Continental Shelf (OCS) Offshore New York Wind Energy Area (WEA).

The Council has management jurisdiction over 13 marine fishery species in federal waters of the Mid-Atlantic region, and members from the coastal states of New York to North Carolina (including Pennsylvania). The Council develops fishery management plans to ensure its vision, "Healthy and productive marine ecosystems supporting thriving, sustainable marine fisheries that provide the greatest overall benefit to stakeholders," is achieved. Marine fisheries are profoundly important to the social and economic well-being of Mid-Atlantic communities, and provide numerous benefits to the nation including domestic food security. In 2014, the commercial seafood industry in the Mid-Atlantic region supported 133,513 jobs, \$16.5 billion in sales, \$3 billion in income, and \$6.1 billion in value added impacts across the Mid-Atlantic.¹ Commercial fishermen landed 591 million pounds of finfish and shellfish in 2014, earning \$471 million in landings revenue.¹ More than 2.2 million recreational anglers took 14.3 million fishing trips and spent nearly \$4 billion on trip and equipment expenditures across the Mid-Atlantic region in 2014.¹

The Council supports policies for US wind energy development and operations that will sustain the health of marine ecosystems and fisheries resources while minimizing the risks to the marine environment and fisheries. While the Council recognizes the importance of energy exploration to U.S. economic security, the Council also notes that the proposed New York WEA is highly important in social, economic, and cultural currency to the fishing communities in the region. Over the past decades the Council has implemented management strategies to maintain sustainable levels of fishing and, in some cases, rebuild overfished stocks. These efforts have necessitated sacrifice from both the commercial and recreational fishing sectors in the form of economic losses and foregone fishing opportunities.

The Council feels the project siting should minimize impacts on existing fisheries and fisheries resources, and should accommodate the coexistence of commercial and recreational fishing activities in the New York WEA. Within and adjacent to this area, there are known important fishing locations, such as Cholera Banks, Middle Ground, Anglers Bank, and the Flats. There are also a number of commercially important fisheries prosecuted in this area, in particular squid, mackerel, butterfish, and sea scallops. The Atlantic surfclam and

¹ National Marine Fisheries Service. 2016. Fisheries Economics of the United States, 2014. U.S. Dept. Commerce, NOAA Tech. Memo. NMFS-F/SPO-163, 235p. Available at: <http://www.st.nmfs.noaa.gov/Assets/economics/publications/FEUS/FEUS-2014/Report-and-chapters/FEUS-2014-FINAL-v3.pdf>.

ocean quahog industry has also expressed concern about the impacts of this lease area on their current and future fishing operations.

Squid fishing industry members have expressed concerns that the revenue estimates contained with the EA do not fully represent the extent of fishing activity and revenues extracted from the proposed New York WEA. They also noted that there are changes occurring in the fishery, which would result in revenues increasing in this area over time, and that the potential impact on future activities is not reflected in the EA. The EA should use the most recent and up to date information, that consider the full breadth of available data and the changing environment, when determining the environmental consequences of leasing the New York WEA.

The fishing industry have also expressed concerns about safety and navigation threats (e.g., radar disruption, vessel collisions, and security threats). They remain concerned exclusion from the New York WEA may force fishing operations into the traffic separation scheme (TSS) lanes, and that the buffers between the TSS and the proposed lease area as proposed in the EA may not be sufficient. Safety issues should be efficiently identified and addressed using best management practices.

The Council emphasizes that early and sustained communication between BOEM, project developers, and the fishing industry is a critical component of conflict avoidance and mitigation. In cases where conflict does arise, the Council also supports the development of a compensatory mitigation fund for damages that occur to the marine environment and fish habitat as well as damages to fishing vessels, their gear, and operations/revenues, as a result of the New York WEA.

The Council's Policy on Wind Energy should be considered with these comments, and can be found at: http://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/56719b9225981df7cbc606d0/1450285970024/Policy_WindEnergy_2015-12-15.pdf

Ideally, wind energy area siting would follow the development of regional ocean plans through the National Ocean Policy process, to ensure a more comprehensive integration of stakeholder inputs at an appropriate regional scale. Nonetheless, we appreciate the opportunity to comment on the proposed New York WEA to ensure that renewable energy development in the Mid-Atlantic region advances the Nation's energy priorities in a manner that minimizes impacts to existing fisheries and ensures the future health of the marine ecosystem and the associated communities in our region.

Please feel free to contact me if you have any questions.

Sincerely,



Richard B. Robins, Jr.
Chairman, Mid-Atlantic Fishery Management Council

cc: R. Robins, L. Anderson, M. Luisi, C. Moore, W. Elliott, J. Coakley