CAPE COD COMMERCIAL
FISHERMEN'S
ALLIANCE
Small Boats. Big Ideas.

Bureau of Ocean Energy Management
Office of Renewable Energy Programs
Federal eRulemaking Portal
BOEM-2023-0025

June 9, 2023

To whom it may concern:

Cape Cod Commercial Fishermen's Alliance submits the following comments in response to the Bureau of Ocean Energy Management (BOEM) call and request for public comment on possible commercial wind energy leasing on the United States Outer Continental Shelf in the Gulf of Maine.

Cape Cod Commercial Fishermen's Alliance is a member-based nonprofit organization that works to build lasting solutions to protect our ecosystem and the future of our fisheries. Fishermen's Alliance represents 150 fishing businesses and more than 300 fishing families, making our organization the leading voice for commercial fishermen of Cape Cod. We represent a diverse group of commercial fishermen, seafood processors, and shoreside support businesses who depend on access to healthy fish stocks and the marine environment. While the species we target, the gear we use, and vessel sizes may differ, we all firmly believe in healthy vibrant fisheries, and resilient coastal communities.

Climate change has begun to affect people and their environments on regional and local scales. The waters surrounding Southern New England and the Gulf of Maine are some of the most productive in the world, but as these waters warm concerns have been raised about how this will impact fisheries resources and the people who depend on them. As a result, there is an urgent need to better understand the environmental changes taking place, and how these changes are affecting our ecosystem. We support more scientific data and collaborative research with the fishing industry to improve oceanographic models and get access to near real-time data to better understand changing conditions and how marine species are responding.

The marine fisheries throughout New England are deeply important to the social and economic well-being of many coastal communities in the Northeast United States and provide numerous benefits to our nation and the blue economy. But the pace and number of offshore wind projects in development throughout our region pose significant challenges for thorough analysis of potential and cumulative impacts, informed public input, and adopting lessons learned from each project. We believe BOEM should coordinate early and often with NOAA Fisheries on the best approach for data analysis of potential impacts to fisheries, including fishing and transiting locations, as well as the socioeconomic impacts. Commercial and recreational fisheries provide a wide range of benefits to small coastal communities, and often they are not fully captured by looking only at financial metrics.

Vessel Trip Report (VTR) and Vessel Monitoring System (VMS) data is a starting point to describing current fishing activity, but what are significant fishing grounds now, may be very different in 5-10 years as stocks move and shift. In the face of a changing ocean, we know marine species respond to warming in very different ways. Some may travel northward into deeper cooler water offshore, and therefore, future fishing areas will expand beyond the current fishing footprints. In the last year, scallopers and lobster fishermen are

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finding themselves further offshore, in deeper waters. This recent change is not reflected in the older VTR and VMS data. It is imperative that BOEM uses the most recent data available (within the last 6-12 months). We do support the areas removed from the Call area such as areas within 20 nautical miles (nm) of the coastline, groundfish closure areas, Closed Area 1 North, Gulf of Maine cod spawning protection area, habitat management areas, and coral protection areas. But additional areas should be removed from the Call area to provide flexibility for fishermen to follow the fish into deeper and/or cooler waters.

Fishing effort can also change based on different management actions such as change to access areas, or changes in allocations. It is imperative that BOEM accounts for the dynamic nature of fishing effort over time when evaluating the potential impacts of offshore wind development to fishermen and fishing communities. NOAA Fisheries and Offshore Wind Interactions: Synthesis of Science Report, highlights that the fishing industry in the U.S. is "highly concerned with the quality of cumulative impacts assessments currently being conduct for OSW development. BOEM's current approach is to analyze projects on an individual basis. The environmental and economic effects will not be isolated, and fishing communities have suggested the scale of analysis should match that of fisheries and ecosystem management practices." An enormous amount of research is still needed to understand the impact of offshore wind development on our environment, and fisheries, but time is limited. We need to better understand ecosystem effects including interactions with benthic habitat, physical habitat, and oceanographic processes, as well as impacts to fisheries socioeconomics, fisheries management, data collection, and regional science planning. BOEM should collaborate with NMFS, the councils, states, fishing industry and other key stakeholders to conduct an offshore wind scenario planning workshop to assess potential scales of OSW development, range of impacts (locally, regionally, and east-coast wide), and range of mitigation strategies. We urge BOEM to have these engagements occur in-person, and at multiple venues and multiple ports in each state.

As part of the siting, design, and permitting process for offshore wind projects, BOEM and some states require developers to prepare various project monitoring plans to characterize, evaluate, and monitor the potential impacts to affected physical and biological resources (fisheries, benthic/habitat, protected species) and fishing operations from proposed offshore wind development. Industry involvement is a crucial part of executing a successful scientific survey, and it is important that BOEM is transparent about the data, and how it is used and interpreted. We strongly support the Before-After-Control-Impact (BACI) design in partnership with local fishermen, to conduct pre-construction, construction and post-construction fisheries monitoring surveys, and urge BOEM to maintain the highest standard for data collection, and not terminate a fishery monitoring survey when the data does not favor offshore wind development. We also believe BOEM should exclude areas where current long-term scientific surveys reside, because they supply critical information and data for species stock assessments. Offshore wind development will disrupt current existing federal fisheries surveys which will result in a reduction in information, increased uncertainty in stock assessments, and result in poorly informed management decisions. The commercial leasing process should proceed on a timeline that sufficiently addresses the challenges associated with incomplete and inaccessible fisheries data.

In summary, climate change is increasingly impacting fisheries and there is a need to mitigate climate impacts. However, impacts of offshore wind energy development are uncertain, and we need more research to be done to understand changes in circulation and productivity, impacts to birds, marine mammals, fish and invertebrates, and address lost fishing opportunities and revenue, gear loss, displaced effort, and safety concerns. We appreciate the opportunity to provide comments. We believe BOEM must engage with the fishing industry and coastal communities as it proceeds with offshore wind development. Fishermen's experiences, knowledge, and network make them an incredibly valuable resource for the successful stewardship of our oceans, and their perspective can help inform siting, conflict minimization and mitigation. We will continue to provide feedback and comments to BOEM throughout the process, to ensure that any wind development in our region minimizes impacts to the marine environment and can be developed in a way that ensures coexistence with our fisheries and the men and women who make their living from the sea.

Sincerely,
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