

July 30, 2018

Walter Cruickshank Acting Director Bureau of Ocean Energy Management 45600 Woodland Road, VAM-OREP Sterling, Virginia 20166

Dear Dr. Cruickshank:

We participate, either directly or indirectly, in a wide range of commercial fisheries in the New York-New Jersey Bight. The Bight is the geographic indentation along the Atlantic Coast extending northeasterly from Southern New Jersey to the eastern tip of Long Island. We write to express our concern and opposition to the proposed wind energy lease areas the Bureau of Ocean Energy Management (BOEM) has put out for "Call" in the New York-New Jersey Bight.

We have appreciated your outreach to our industry over the past year, and hope we can continue a constructive dialogue. At the same time, we want to make sure you understand that the risks to our industry from poorly-planned offshore wind energy development are immense. If you were to draw a bulls-eye where our historic Mid-Atlantic fishing grounds are on a map, the bulls-eye would include the Hudson North and Hudson South Areas identified by the State of New York, and the Fairways North and Fairways South areas that BOEM unilaterally and subsequently added to the Call. This is a profound threat to our fisheries, the ocean habitat more generally, and our way of life.

The fisheries we depend on include sea scallops, squid, summer flounder, scup, black sea bass, surf clams, ocean quahogs, mackerel, butterfish, herring, monkfish, skate, golden tilefish, spiny dogfish, and other pelagic and demersal fish and shellfish. We come from North Carolina to Massachusetts to fish in the federal waters being considered for wind leasing.

As direct participants in these fisheries, we work aboard or own commercial fishing vessels, and very often both. As indirect participants, we work in shore-side businesses commercial fisheries support. In our coastal communities, where fishing is a way of life, we work at fish processing plants, ship chandleries, fuel docks, fishing gear suppliers, and vessel and gear maintenance and repair facilities, as well as banks and insurance agencies, and other financial services businesses. Because fishing is so central to the tax base in our communities, we are also teachers, public officials, and others employed in the public sector. We are family members. Our communities are similar to the western mining and timber communities with which you may be more familiar.



In a June 7, 2018 letter to BOEM, the National Marine Fisheries Service (which conserves and manages our federal fisheries) calculated that, between 2012-2016, bottom-tending fishing gear were utilized to harvest over \$344 million in fish and shellfish from the Call areas. Nearly \$270 million of scallops alone were harvested, followed by \$47.7 million of surf clams and ocean quahogs, \$8.9 million of summer flounder, scup and black sea bass, and \$3.9 million of mackerel, squid, and butterfish. Over these five years in total, over 62 million pounds of fish and shellfish were harvested. BOEM must study and heed NMFS' June 7 letter in making renewable energy siting decisions in the New York-New Jersey Bight.

The Interior Department should provide for intelligent and deliberate offshore renewable energy development, rather than fall prey to the gold rush mentality promoted by BOEM and financially–interested wind developers, most of which are foreign-owned. Altogether, BOEM has already leased or identified for lease over a dozen areas offshore the East Coast, not counting these New York-New Jersey Bight areas. However, BOEM has not gained any practical experience with the benefits and burdens of wind farm construction yet. There isn't even a single turbine constructed yet in federal waters, but BOEM is in a pell-mell rush to lease more areas. Nor, as NMFS has repeatedly noted, has BOEM undertaken any baseline studies of the fisheries and ocean habitat its leasing activities will disrupt and displace.

Mr. Secretary, please ensure offshore renewable energy projects are sited, constructed and operated using the best scientific information available. For its part, NMFS has access to over four decades of information that it uses to make fisheries decisions, and new information is available daily. Many of us participate in cooperative research with NOAA science centers, allowing our vessels to be used as research platforms for federal, state, university, and other scientists and investigators. And we have our own catch reports and vessel position data which we have provided and BOEM has ignored.

When President Trump campaigned and was elected, he promised to look after America's working middle class, of which we are all a part. You will <u>not</u> be honoring the President's commitment if you allow BOEM to lease ocean areas first, and ask and answer the necessary questions later.

Thank you very much for taking the environment and our livelihoods into account as you plan for the renewable energy future.

## Respectfully Submitted,

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