



July 30, 2018

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Dr. Cruickshank:

The Bureau of Ocean Energy Management (BOEM), in conjunction with the State of New York, has recently issued a Call for Information and Nominations to solicit interest in developing the New York Bight area into four offshore windfarms. This is an ill-conceived idea that will cause irreparable economic harm within the fishing communities along the entire East Coast. The harm to Massachusetts will be especially significant, given that it is the center of the Atlantic sea scallop fishery and contains major surf clam and ocean quahog operations.

The four areas in question, the Fairways North, Fairways South, Hudson North and Hudson South, are vital fishing grounds that have been providing our nation with natural, genetically unaltered food for far longer than government has kept data on fishery resources.

Of the many species of commercially and recreationally caught fish, the most abundant and valuable species is the Atlantic sea scallop. The National Marine Fisheries Service estimates that, on average, \$53,659,600 is generated in scallop landings each year from the New York Bight Call Areas. Average annual surf clam/ocean quahog revenues are just under another \$8 million. That estimate does not include commercial landings of other species, revenue generated from recreational fishing, or the indirect and induced revenue created by commercial and recreational fishing from the New York Bight Call Area.

For its part, the success of the scallop fishery depends on the equilibrium between the number of vessels and the crewmen versus the total geographic areas available for fishing. Eliminating traditional scallop fishing grounds, especially on the magnitude of the New York Bight proposal, will increase fishing pressure on the remaining fishing grounds, causing additional economic hardships for the scallop fishermen and the industries that

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support them. Displacement of fishing effort also has adverse ecological impacts on the sustainably fished scallop fishery.

In previous public meetings hosted by BOEM and/or the wind developers, they repeatedly claim there will be no laws or regulations enacted to prevent fishing in the leased areas and offshore windfarms can exist without causing harm to the fishing industry. Yet many of these same developers prohibit mobile fishing gear in wind farms in Germany, Belgium, Holland, and Denmark, four of the five largest wind energy producing countries.

Even if these developers' assurances could be believed, the notion of U.S. federal waters fishermen conducting their normal operations in a windfarm is at best patently naive. The existence of wind turbines are themselves an impediment to commercial fishing. Review of windfarms in Europe and the proposed windfarms off Massachusetts indicate the turbines are to be spaced approximately $\frac{3}{4}$ to a mile distant from each other, which means a fishing vessel towing at a speed of five knots will approach a turbine every twelve minutes or so. The timeframe between turbines is further reduced when one considers the vessels are towing fishing gear that is $\frac{1}{4}$ mile behind the vessel. Maneuvering around obstacles every 10-12 minutes is further complicated by natural considerations such as darkness, wind, rain, currents, waves or visibility issues. Furthermore, the spinning blades of the turbines cause radar interference which will cause navigational and safety hazards by obscuring other nearby turbines or vessels.

Another factor to consider in the offshore wind farm debate is whether or not the offshore wind farms are actually needed. In fact, BOEM has already leased 13 areas offshore the U.S. Atlantic coast, before producing a single watt of power from any of these leases. According to the U. S. Energy Information Administration's [Annual Energy Outlook 2018 With Projections to 2050](#), the projected annual demand for electricity between 2018 and 2050 will increase by 0.3% to 0.9%. With the advancements made in, and the decreasing costs of producing electricity from, renewable resources such as photovoltaic cells and wind turbines, combined with the relatively low cost of natural gas, other areas would be far more suitable for development without destabilizing an entire industry.

Finally, it is important to recognize the majority of leased areas on the East Coast is controlled by foreign developers and investment firms, and most of the turbine components will be manufactured overseas. It seems illogical to displace domestic fishermen in favor of supporting foreign companies in creating something that may not be needed or could be easily located elsewhere. At the same time, reducing domestic fish and shellfish catches, increases our dependence on foreign-caught seafood, often from questionable sources, and produced under uncertain health and safety standards. We thought President Trump wanted to promote exports.

For these reasons, among others, we would ask the Bureau of Ocean Energy Management to remove the New York Bight Call Area from offshore wind lease development consideration and help preserve the historic fishing areas and the local fishing communities that are dependent on them for survival.

Respectfully Submitted,

Businesses and Vessels

Atlantic Capes Fisheries
Base New England/Whaling City Auction
Dockside Repairs, Inc.
Duckworth Steel Boats
F/V Atlantic Prince
F/V Boomer T00
F/V Defiant
F/V Endeavor
F/V Furious
F/V Jenna Lee
F/V Kate
F/V Kate Ll
F/V Miss Leslie
F/V Miss Shauna
F/V Mirage
F/V Regulus
F/V Settler
F/V Shearwater
F/V Starlight
F/V Sunlight
F/V William & Lauren
Hunter Scalloping Co
J. Goodison Shipyard
Jardin & Dawson Boat Settlement
Kathryn Marie Scalloping Co
Ligia Scalloping Co
Marine Hydraulics, USA
Mass Contracting & Construction
Mass Fabricating & Welding
R. A. Mitchell, Co.
Tempest Fisheries
W Trading, Inc.

Individuals

Anne Jardin-Maynard
Bill Wasilewski
Bob Mitchell
Brett Eilertsen
Cameron Miele
Cassie Canastra
Celso Morales

Chris Braga
Darryl Cutter
Donald Price
Eduardo Alarcon
Eric Hansen
Erik Orman
Fernando Homen
Gary Hatch
Jack Cardare
James Gutowski
Jay Elsner
Joe Gilbert
Joel Duckworth
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Juan Sanchez
Leslie Weckesser
Lisa Veiga
Marc Lorenz
Michael Amarante
Michael Oliveira
Mike Walsh
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Robert Scammon Jr.
Jeff Policy
Manuel Pereira
Alan Sherman
Joseph Furtado
Paul Pedreira
Paul Valente
Adam Benner

Cc: His Excellency Charles D. Baker, Governor, Commonwealth of Massachusetts
The Honorable Jonathan F. Mitchell, Mayor, City of New Bedford, Massachusetts