



Responsible Offshore Development Alliance

April 14, 2020

Governor Charlie Baker
Massachusetts State House
24 Beacon St.
Office of the Governor, Room 280
Boston, MA 02133

Governor Chris Sununu
Office of the Governor
State House
107 North Main Street
Concord, NH 03301

Governor Janet T. Mills
1 State House Station
Augusta, ME 04333

Dr. Walter Cruickshank, Acting Director
Bureau of Ocean Energy Management
1849 C Street NW
Washington, D.C. 20240

Dear Governor Baker, Governor Mills, Governor Sununu, and Director Cruickshank:

On behalf of fishing industry and community leaders who live and operate in the Gulf of Maine (GOM), the Responsible Offshore Development Alliance (RODA) offers the following four requests for your consideration in regards to offshore wind development in the GOM.

RODA is a membership-based coalition of fishery-dependent companies and associations committed to improving the compatibility of new offshore development with their businesses. Our approximately 170 members are comprised of major fishing community groups and associations, individual vessels, and shoreside dealers operating in federal and state waters of the New England, Mid-Atlantic, and Pacific coasts. We have many members from your states that operate in the Gulf of Maine (GOM) who have witnessed how offshore energy development has unfolded in other regions, and are very concerned that the same fragmented process will occur in their fishing grounds.

Due to the planned use of floating offshore structures for wind energy development in the GOM, lease areas will become de facto closures to fishing. Technology is evolving to minimize the footprint of the base of an offshore wind platform, but current proposed technologies still have mooring lines and flexible cabling that will make any type of fishing – fixed or mobile gear – incredibly unlikely within a wind energy area (WEA). Offshore wind energy development in the GOM is therefore a topic of extreme concern to the region's fishermen and fishing-dependent communities.

First, given the unprecedented nature of the global pandemic we are experiencing, we respectfully request a **six-month pause** in the regulatory process for Outer Continental Shelf (OCS) renewable energy development in the GOM. Public participation and engagement is exceedingly important throughout the entire regulatory process, but especially at the early stages of project siting since floating wind energy facilities will constitute fisheries closures for the reasons described above. Due to COVID-19 many meetings and opportunities for this engagement have been postponed until further notice. Additionally, as the pandemic is

having immense financial impact on all American businesses, the fishing industry is no exception. Many resources, including time and effort, from the commercial fishing sector must be diverted to addressing the issue at hand, leaving insufficient opportunities for meaningful engagement in the siting and other planning of potential offshore renewables.

In addition to the good faith that will be earned by committing to move forward only once fishermen can be actively involved, there are other benefits that may be recouped by taking this (non)action. A principle concern from the fishing industry is how these wind turbines will impact the marine ecosystem. As any good scientist knows, baseline data is fundamental to answering any research question about environmental change. A delay in the siting process will allow for an opportunity to generate a longer time series of baseline data, which is incredibly important for understanding an ecosystem that is defined by variable seasonal and inter-annual cyclical changes. Furthermore, in the GOM there are major fisheries data deficiencies including, notably, for the lobster fishery. Slowing the process down would allow better opportunities for industry to develop strategies to generate and share data in a meaningful way to help inform the siting of offshore development. We therefore request that this time be used to engage in the research activities needed to responsibly inform offshore wind energy planning—both through gathering existing data and building out new data streams—while also forming the necessary structures and processes to support constructive engagement once the public health crisis subsides.

Second, we feel it is imperative to convene a **fisheries-driven GOM regional working group** to fully participate in the offshore development process. Vessels home-ported in Maine, New Hampshire, and Massachusetts all fish in the GOM and have unique spatial and operational needs, and complementary understanding of the ecosystem there. Fragmenting the region's fishermen into state groups (which can be entirely arbitrary for those with federal fishing permits) puts too much pressure on them to follow every meeting and engagement opportunity in each state. Experience in other regions has indicated that a regional group, convened and led by the industry, will be the only fair and equitable way for commercial fishing concerns to be properly addressed. We anticipate this group will improve fishermen's involvement in numerous ways, including the following:

- Provide recommendations to federal and state regulators for involving fishermen and incorporating fisheries science into decision making;
- Empower fishermen to develop consensus in identifying critical fishing grounds or forming other spatial recommendations;
- Coordinate fishermen's involvement while minimizing redundancy for them in federal and state-specific working groups that overlap with fisheries issues;
- Streamline requests for information and provide easily identifiable educational opportunities in order to ensure fisheries professionals are well informed regarding offshore wind energy development and technology;
- Prioritize data requests so that fishing industry participants can better inform their input during siting and transmission discussions with BOEM and potential future developers;
- Improve data streams to include non-electronic fishing vessel traffic and reporting; and

- Generate ideas amongst the industry to improve the use of fisheries-dependent data in renewable energy planning.

We hope that this first-in-the-nation initiative will serve as a model to avoid the acrimonious outcomes seen in other regions. Furthermore, having a well-informed and fully engaged fishing industry *now* will be the determinative factor of whether regulators, developers, and fishermen are collectively able to devise mitigation strategies in advance of project installation (some of which, such as technology or gear innovations, take considerable time to research or implement). Your support of RODA and fishing industry leaders in this approach would demonstrate true leadership.

Third, we would like to reiterate previous requests from RODA, the New England Fishery Management Council, and others to BOEM to **not consider any unsolicited bids** for renewable energy development areas in the GOM, and request the states to support this unanimous request from fisheries experts. Unsolicited bids for offshore development circumvent sufficient and comprehensive engagement with other users, especially fishing communities. Siting of lease areas is paramount to minimizing impacts and de-conflicting with other uses of the OCS and this process ought to be fair and transparent. Because any qualified entity can submit an unsolicited bid, even if such a bid leads to a competitive leasing process, lines arbitrarily drawn on a map are likely to eventually become developed areas. If federal and state regulators genuinely aim to maximize compatibility of the two ocean uses, fishermen from the GOM need their input to be properly and openly evaluated during the planning and analysis phase for delineating WEAs.

Lastly, GOM fishermen are requesting greater transparency in offshore wind procurement goals and their **context within an overall energy strategy**. A more open exchange of information on the relative availability, price, and environmental impacts of all existing and potential energy sources for the region will be beneficial to the citizens of ME, NH, MA, and all those who rely on other resources found in the GOM for their livelihoods.

Thank you for your consideration of these concerns and our request for support on these important issues. We look forward to hearing from you and your staff to further discuss these requests.

Sincerely,



Annie Hawkins, Executive Director
Responsible Offshore Development Alliance
P.O. Box 66704
Washington, D.C. 20035
Email: annie@rodafisheries.org

On behalf of the following fishery-dependent businesses and associations:

Maine

Associated Fisheries of Maine
Maggie Raymond, Executive Director
Maine

F/V Bug Catcha
Gerry Cushman, Owner
Port Clyde, ME

F/V Knotty Lady
Dustin Delano, Owner
Friendship, ME

F/V Jocelyne K
Herman Coombs, Owner
Orr's Island, ME

F/V Jocka
Terry Alexander, Owner
Harpwell, ME

F/V Overkill
James Wotton, Owner
Friendship, ME

Maine Coast Fishermen's Association
Ben Martens, Executive Director
Maine

Maine Lobstermen's Association
Patrice McCarron, Executive Director
Maine

Maine Lobster Dealers' Association
Annie Tselikis, Executive Director
Maine

O'Hara Corporation
Mary Beth Tooley, Government Affairs
Rockland, Maine

New Hampshire

Explore the Ocean World, LLC
Ellen D. Goethel, CEO
Hampton, NH

F/V Ellen Diane
David T. Goethel, Owner
Hampton Harbor, NH

New Hampshire Commercial Fishermen's
Association
Erik Anderson, President
New Hampshire

Northeast Fishery Sector XI
Dan Salerno, Sector Manager
New Hampshire

Yankee Fishermen's Cooperative
Jim Titone, President &
Linda Hunt, General Manager
Seabrook, NH

F/V Patty-B
Dale Blatchford, Owner
Hampton, NH

F/V Sadie Amelia
Norman Moore, Owner
Hampton, NH

F/V Whats Next
Jeffrey Ruccio, Owner
Hampton, NH

F/V Black Swan
Stephen Joyce, Owner
New Hampshire

F/V Miss Maura
Peter Lagerstrom
Hampton, NH



Responsible Offshore Development Alliance

Massachusetts

Cape Seafoods Inc.
Western Sea Fishing Company
F/V Endeavour, Gloucester, MA
F/V Challenger, Gloucester, MA
Gerry O'Neill, President/Director
Gloucester, MA

Cape Cod Commercial Fishermen's
Alliance
John Pappalardo, CEO
Massachusetts

Double Diamond Fishing Corp.
Maurice Lemieux
New Bedford, MA

F/V America
F/V American Pride
F/V Padre Pio
Salvatore Bramante, Owner
Boston, MA

F/V Angela & Rose
Francesco Paul Vitale, Owner
Gloucester, MA

F/V Atlantic Prince
F/V Boomer II
F/V Guardian
F/V Olympia
F/V Tremont
Michael Walsh, Owner
Boston, MA

F/V Explorer II
Bonnie Akerley, Owner
Gloucester, MA

F/V Labor in Vain
Doug Germain, Owner
Gloucester, MA

F/V Midnight Sun
Thomas Testaverde, Owner
Gloucester, MA

F/V Miss Emily
Kevin Norton, Owner
Scituate, MA

F/V My Grace
Frank Sciortino, Owner
Gloucester, MA

F/V Mystique Lady
Joseph Jurek, Owner
Gloucester, MA

F/V Razzo
Joseph Randazzo
Gloucester, MA

F/V Sabrina Maria
Albert Cottone, Owner
Gloucester, MA

F/V Santo Pio
Joseph Orlando, Owner
Gloucester, MA

Fishing Partnership Support Services
J.J. Bartlett, President
Massachusetts

Gloucester Fishermen's Wives Association
Angela Sanfilippo, President
Gloucester, MA

Hansen Scalloping Inc.
F/V Endeavor
F/V Intrepid
Eric Hansen, President
Marion, MA

Massachusetts Fishermen's Partnership
Edward Barrett, President
Massachusetts

Massachusetts Lobstermen's Association
Beth Casoni, Executive Director
Massachusetts

Northeast Sector Service Network Inc.
Libby Etrie, Program Director
Massachusetts

Northeast Fishery Sector II
Joseph Orlando, President &
David Leveille, Sector Manager
Represents 137 permits owned by 64
members; 54 active vessels in the GOM
Gloucester, MA

Northeast Fishery Sector VI
Michael Walsh, President &
David Leveille, Sector Manager
Represents 24 permits owned by 5
members; 12 active vessels in the GOM
Boston, MA

Lund's Fisheries, Inc.
JT Sea Products
Loper Bright Enterprises
Lund-Marr Trawlers, LLC.
Wayne Reichle, President
New Jersey (with operations in MA and ME)

Northeast Fishery Sector VIII
New Bedford, MA

Northeast Fishery Sector X
Timothy Barrett, President
John Haran, Sector Manager
S. Dartmouth, MA

Northeast Fishery Sector XIII
John Haran, Sector Manager
Scituate, MA

Boat Kathleen A. Mirarchi, Inc.
Frank Mirarchi, President & CEO
Scituate, MA

Northeast Seafood Coalition, MA
Jackie Odell, Executive Director
Massachusetts

Atlantic Capes Fisheries Inc.
Atlantic Harvesters LLC
Galilean Seafood Inc.
Sam Martin, COO
New Jersey (with operations in MA and RI)