



Gloucester Fishermen's Wives Association™

**Mr. Zachary Jylkka
Bureau of Ocean Energy Management
Office of Renewable Energy Programs
45600 Woodland Road (VAN-OREP)
Sterling, Virginia 20166**

November 16, 2023

Dear Mr. Jylkka,

Since 1969, the Gloucester Fishermen's Wives Association (GFWA) has been a prominent advocate for the fishing industry, striving to promote a sustainable environment and a fair economy for local and family-owned businesses. Our history of involvement in various environmental and marine issues, such as the Stellwagen Marine Sanctuary declaration with NOAA in 1993, attests to our commitment to preserving commercial and recreational fishing.

We write to express our deep concerns regarding the Department of Interior's (DOI) proposal to establish offshore wind (OSW) farms in the Gulf of Maine (GOM). This development poses a significant threat to the seabed, potentially altering the marine ecosystem irreversibly, particularly in the designated calling areas by the DOI.

The proposed offshore wind (OSW) farm development in the Gulf of Maine (GOM) raises significant concerns about food security. The Massachusetts fishing industry, a cornerstone of the local economy and a key player in global food supply, is at risk. Our fishermen have been feeding communities for over 400 years, and during the recent COVID crisis, they were pivotal in maintaining food supply when other sources faltered. The OSW development threatens this legacy by potentially reducing the seafood supply, impacting not only our local communities but also the broader food security network. The Massachusetts fishing industry, worth billions and employing thousands, faces an uncertain future if displaced from the GOM.

Our fishermen already navigate a myriad of challenges, including climate change, which has altered fish patterns and habitats; low quotas for valuable fish stocks, constraining their ability to earn a livelihood; and anticipated closures to protect the endangered North Atlantic right whale. These factors combine to create a highly precarious situation for our fishing communities, who have adapted and persevered through these hardships to continue providing essential food resources.

Additionally, the safety and livelihoods of our fishermen, who navigate the GOM, cannot be jeopardized. The GFWA stands firmly against compromising these critical aspects of our community for the proposed OSW developments. Further constriction of our local fishing capacity could lead to complete dependence on imports, raising concerns about sustainability and fishing practices. We must question the wisdom of trading a centuries-old natural resource, crucial for food security, for an energy resource with a comparatively limited lifespan.

Furthermore, the introduction of OSW farms poses yet another significant concern, particularly regarding their impact on marine mammals. The North Atlantic right whale, already endangered, could be further threatened by the construction and operation of these wind farms. The noise and disruption caused by such developments are not fully understood, but they have the potential to affect the migration, feeding, and breeding patterns of these whales. The uncertainty surrounding these impacts calls for a cautious approach, considering the critical status of the right whale population.

In light of the significant concerns regarding food security, the compounded challenges faced by our fishermen, and the potential negative impacts on marine mammals, especially the endangered North Atlantic right whale, the GFWA stands firmly against the proposed OSW developments in the GOM.

We urge the Bureau of Ocean Energy Management to reconsider this proposal, taking into account the long-term wellbeing of our fishing communities, the broader ecosystem, and the critical importance of preserving marine life.

A handwritten signature in cursive script that reads "Angela Sanfilippo".

Dr. Angela Sanfilippo
President, Gloucester Fishermen's Wives Association



MASSACHUSETTS FISHERMEN'S PARTNERSHIP, INC

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Mr. Zachary Jylkka
Bureau of Ocean Energy Management
Office of Renewable Energy Programs
Sterling, Virginia 20166

Dear Mr. Jylkka,

The Massachusetts Fishermen's Partnership (MFP), representing over 4000 commercial fishermen and 16 fishing organizations, appreciates the opportunity to comment on BOEM's proposed wind energy leasing areas in the Gulf of Maine outer continental shelf (OCS).

In our capacity as the Massachusetts Fishermen's Partnership (MFP), an organization deeply rooted in the fishing community of Massachusetts, we have been at the forefront of discussions on the responsible development of offshore wind (OSW) for over a decade. Our engagement is not just as stakeholders, but as active participants in shaping the future of our coastal waters which are both our workplace and our legacy.

The MFP's expertise and experience, drawn from representing a diverse array of our member organizations, provide us with a unique and comprehensive understanding of the multifaceted nature of our industry. We have been closely monitoring and participating in OSW discussions since the initial proposals, such as the Cape Wind project. Our history in these discussions is not just as observers but as advocates for a balanced approach that respects the needs of the fishing industry while acknowledging the importance of renewable energy.

Our role in these discussions has been pivotal. We have offered insights into the practical realities of fishing in proposed OSW areas, highlighted potential ecological impacts, and underscored the need for thorough and genuine stakeholder engagement. The MFP has consistently advocated for a development approach that does not merely involve the fishing community in discussions as a formality but integrates their knowledge and concerns into the planning and implementation phases. This approach is vital in ensuring that the development of OSW is not at the expense of the fishing industry, which is a cornerstone of the Commonwealth's economy and cultural heritage.

Despite our involvement and proactive stance, we have observed a recurring pattern where the concerns of the fishing community are overlooked or inadequately addressed in the rush to advance OSW projects. The current trajectory of development in the Gulf of Maine is particularly alarming. Proposals are advancing without adequately considering the long-term consequences for the fishing industry and the marine ecosystem. The spacing of turbines, for instance, has been a major point of contention. The MFP has consistently argued for layouts that allow safe navigation and fishing activities, yet these

recommendations have often been ignored in favor of designs that prioritize energy yield over marine safety and sustainability.

The MFP's commitment to this issue extends beyond advocacy. We have actively sought solutions that could allow for the coexistence of renewable energy and sustainable fishing practices. For example, the MFP was instrumental in securing a \$300k grant aimed at retraining commercial fishermen to work in the renewable energy sector. This initiative is a testament to our belief that it is possible to have both clean energy and a thriving fishing industry, but only if there is a sincere commitment to collaboration and mutual respect.

The MFP's involvement in the OSW discussions is driven by a deep understanding of and commitment to the fishing industry. Our stance is not opposition for the sake of opposition, but a call for a balanced, respectful, and genuinely collaborative approach to developing offshore wind energy—a strategy that recognizes and integrates the needs and expertise of the fishing community to ensure the sustainable future of both our industry and the environment we depend upon.

However, current offshore wind (OSW) development strategies, particularly in the Gulf of Maine, raise significant concerns. Our history with these projects, including the Cape Wind project, reveals a pattern of inadequate stakeholder engagement and a lack of comprehensive impact analysis on the fishing industry and ecosystems. We advocate for genuine collaboration, not mere placation. The engagement of the commercial fishing industry from the early stages of site development is essential.

But often, our expertise and knowledge are dismissed. For example, we have consistently argued that the proposed turbine spacing in most OSW projects does not meet our safety needs, especially in rough weather. Additionally, safety concerns include navigation hazards and crowding effects, with traffic data suggesting a significant risk of accidents and fatalities. These additional costs to industry, and fishing families, are almost never adequately addressed in the environmental impact assessments.

In conclusion, we urge BOEM to prioritize collaborative approaches with the fishing industry; to develop reasonable, not rushed, timelines for development; and to make sure that offshore wind developments are conducted responsibly and with minimal impact on our crucial fishing heritage and ecosystem sustainability. Based on the proposed plan to date—none of these factors are being considered, and we therefore oppose any development in its current form.

Sincerely,

A handwritten signature in cursive script that reads "Ed Barrett".

Ed Barrett

President, Massachusetts Fishermen's Partnership

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Nine Dale Avenue
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ma.gov

CITY OF GLOUCESTER

November 16, 2023

Mr. Zachary Jylkka
Bureau of Ocean Energy Management
Office of Renewable Energy Programs
45600 Woodland Road (VAN-OREP)
Sterling, Virginia 20166

Subject: Critical Concerns Regarding Wind Power Development in the Gulf of Maine

Dear Mr. Jylkka,

The Gloucester Fisheries Commission, established in 1955 to safeguard Gloucester, the nation's oldest commercial fishing port, is deeply concerned about the proposed offshore wind (OSW) projects in the Gulf of Maine. The area under consideration has been a cornerstone of Massachusetts' and the nation's fishing industry for over 400 years. The decision to potentially repurpose these waters without considering Vessel Monitoring System (VMS) data, as advocated by the local fishing community, seems to overlook the substantial impact this project could have on the industry.

Perhaps the most serious risk is safety. The introduction of OSW structures in traditional fishing areas significantly elevates the risk of maritime accidents, particularly in adverse weather conditions. Navigation around these large structures becomes highly challenging, increasing the likelihood of vessel collisions and damage. This is not a hypothetical concern, but a reality observed in various fisheries across the globe.

For example, in the North Sea (Europe), they have a high density of OSW installations. Reports from this region highlight increased navigational hazards for fishing vessels operating near wind farms. The risk is particularly acute during poor visibility conditions, where the structures become serious collision hazards. In the fishing grounds off the Jiangsu Province, in China, where extensive OSW development has taken place, local fishermen have reported difficulties in navigating through turbine arrays. These difficulties are exacerbated during foggy or stormy conditions, leading to several incidents of vessel damage and near-misses with the structures.

The integration of OSW projects into marine environments is also a relatively new venture, and thus, there is a significant gap in our understanding of their long-term effects on marine life, fish populations, and the overall bio-economy of these ecosystems. This lack of long-term studies and conclusive data presents a considerable risk, as the potential disruptions could have far-reaching and possibly irreversible consequences.

For example, studies in the North Sea, where OSW projects are prevalent highlight displacement and behavioral changes in commercial fish species, which can have cascading effects on the local fishing industry and marine biodiversity. Alterations in fish behavior and habitat can lead to decreased catch rates, impacting the livelihoods of local fishing communities and the broader economy reliant on these industries.

Lack of reliable data on fishing effort exacerbates the situation. The absence of comprehensive VMS data in the decision-making process leads to a skewed understanding of the fishing activities in the Gulf of Maine. This oversight undermines the accuracy of assessments regarding the impact of OSW projects on local fisheries.

The designated OSW areas are situated in some of the last remaining productive fishing grounds due to various restrictions in other regions. Therefore, the displacement of fishing efforts from the OSW areas will severely strain the already precarious position of our fishing fleets, affecting not only Gloucester but the entire Commonwealth of Massachusetts.

The Gloucester Fisheries Commission firmly believes that the advancement of renewable energy should not come at the cost of the livelihoods and safety of those who have depended on these waters for centuries. We urge the Bureau of Ocean Energy Management to reconsider the proposed OSW projects in the Gulf of Maine, taking into account the critical issues raised above.

Sincerely,



Dr. Angela Sanfilippo
Chair of Gloucester Fisheries Commission



Al Cottone

Executive Director of Gloucester Fisheries Commission

November 18, 2023

Mr. Zachary Jylkka
Bureau of Ocean Energy Management
Office of Renewable Energy Programs
45600 Woodland Road (VAN-OREP)
Sterling, Virginia 20166



www.maseafoodcollab.com

Dear Mr. Jylkka,

On behalf of the Massachusetts Seafood Collaborative, Inc. (MSC), a 501(c)6 organization formed during the COVID-19 pandemic, I write to express our collective concerns and perspectives regarding the current and future state of the Massachusetts seafood industry.

Our collaborative represents a diverse range of stakeholders in the seafood supply chain, from fishermen to processors and wholesalers. Together, we confront numerous challenges, including foreign competition, climate change, the advent of offshore wind developments, and the aging of our workforce. In these times of transformation, it's imperative that our voices be heard, and our concerns addressed.

As we adapt to these changes, MCS's focus remains on strengthening the industry through various initiatives. These include increasing procurement opportunities, expanding marketing efforts, modernizing infrastructure, enhancing workforce development, bolstering public education, exploring research opportunities, and advocating for regulatory reform.

We acknowledge the potential benefits of renewable energy initiatives like offshore wind farms. However, we urge careful consideration of their impact on the marine ecosystem and, by extension, our seafood industry. The Massachusetts fishing industry, a pillar of our local economy and a significant player in the global food supply, is at a critical juncture. Our fishermen, who have been feeding communities for over 400 years, now face an uncertain future with the proposed developments in the Gulf of Maine.

Our industry, deeply interwoven into the fabric of Massachusetts' economy and heritage, now faces a significant threat from the proposed offshore wind developments. These initiatives, while promising in terms of renewable energy, pose potential risks to the delicate marine ecosystems and the traditional fishing areas that our industry relies upon. The impact of such developments is far-reaching, extending beyond the immediate vicinity of the fishing grounds to every node of our supply chain.

The installation of offshore wind farms could disrupt fishing patterns, leading to reduced catches, and affecting the livelihoods of fishermen, many of whom have been in this profession for generations. This reduction in supply does not merely impact those at sea; it ripples through

the entire chain, affecting processors, wholesalers, and the supporting infrastructure. Reduced supply can lead to increased costs, making it challenging for small and medium-sized businesses to sustain themselves. Furthermore, changes in the marine ecosystem could lead to longer-term ecological impacts, which may not be immediately apparent but could have profound effects on the sustainability of our industry.

By bringing together a large and diverse group of stakeholders, we can better understand and articulate the complex and interconnected impacts that offshore wind development may have on our industry. Our united voice is critical in advocating for the protection of our seas, the sustainability of our businesses, and the preservation of the Commonwealth's rich fishing heritage. It allows us to present a unified front in discussions with policymakers and stakeholders, ensuring that the needs and concerns of the entire seafood supply chain are adequately represented and addressed.

The MSC's goal is not only to preserve what we have today but to ensure the prosperity and sustainability of Massachusetts' seafood industry for future generations. In doing so, we reinforce our commitment to the Commonwealth's economy and heritage, which has been shaped significantly by our industry over the centuries.

The Massachusetts Seafood Collaborative, Inc. (MSC) firmly believes that our strength lies in our diversity. A broad and inclusive membership, encompassing all facets of the seafood supply chain, is not just beneficial but crucial for our collective success. This diversity includes fishermen, processors, wholesalers, and those involved in supporting infrastructure. Each segment brings unique insights and experiences, creating a comprehensive understanding of the industry.

Considering these perspectives, we respectfully request that the Bureau of Ocean Energy Management consider the long-term impacts of offshore wind farm developments on the seafood industry. It is vital to balance the pursuit of renewable energy with the sustainability of a sector that has been a cornerstone of Massachusetts' economy and cultural heritage.

Thank you for considering our position. We look forward to a constructive dialogue and are eager to collaborate on solutions that safeguard the future of the Massachusetts seafood industry.

Sincerely,


Roger Berkowitz.

President, Massachusetts Seafood Collaborative, Inc.

maseafoodcollab@gmail.com

BOEM is interested in feedback and information regarding site conditions, resources, and multiple uses in close proximity to or within the Draft WEA. When references a specific area within the Draft WEA, please refer to the corresponding grid number (Figure 4). Below are guiding questions to provide constructive public comment.

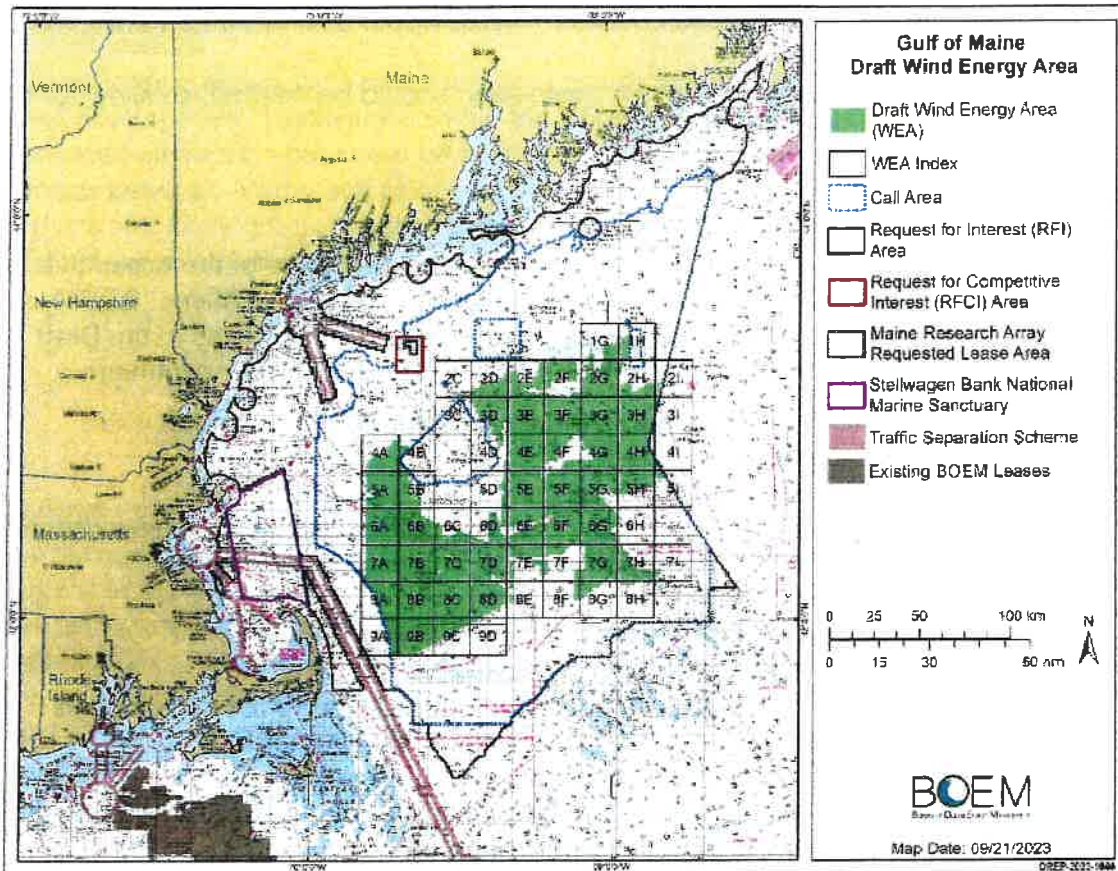


Figure 4. Gulf of Maine Draft WEA with grid overlay. Source: BOEM.

Feedback Requested: Information on Draft WEAs

Secondary Areas

These areas are not part of the Draft WEA, however, BOEM is seeking information for further analysis.

Should Secondary Areas A, B, and/or C or any portion of those areas, receive consideration as Final WEAs?

Under what recommended conditions?

- *e.g., Leasing should be considered only after a certain number of years of electronic vessel tracking data are collected on lobster vessels to better understand high concentrations of lobster activity to avoid it in a lease.*