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Commercial Leasing for Wind Power on the Outer Continental Shelf (OCS) Offshore New Jersey –
Call for Information and Nominations

Comment On: BOEM-2011-0005-0001

Commercial Leasing for Wind Power; Call for Information and Nominations Outer Continental Shelf
Offshore New Jersey

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Comment from Chris Moore, organization

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Organization: Mid-Atlantic Fishery

Government Agency Type: Regional

Government Agency: Mid-Atlantic Fishery Management Council

General Comment

See attached file(s)

Attachments

BOEM-2011-0005-DRAFT-0009.1: Comment from Chris Moore, organization

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Christopher M. Moore, Ph.D.
Executive Director

June 6, 2011

Mr. William Waskes, Project Coordinator
BOEMRE, Office of Offshore Alternative Energy Programs
381 Elden Street, Mail Stop 4090
Herndon, Virginia 20170

Dear Mr. Waskes:

The Mid-Atlantic Fishery Management Council (MAFMC) encourages and supports development of alternative energy sources to reduce our Nation's reliance on foreign oil. To the extent that near shore windmill farms can help alleviate this dependence, we support their development and operation. However, this development must consider the impacts such activities might have on the fishery resources found in those same federal waters.

The MAFMC has reviewed the Bureau of Ocean Energy Management, Regulation and Enforcement's (BOEMRE) Call for Information and Nomination for Commercial Leasing for Wind Power on the Outer Continental Shelf (OSC) Offshore New Jersey published in the *Federal Register* April 20, 2011. As indicated in the notice, the call itself is not a leasing announcement. However, as indicated, the area described in the notice may be subject to future leasing. This area is approximately 418 square nm and contains 43 whole OCS blocks and 34 partial OCS blocks.

In July 2010, President Obama signed Executive Order 13547 to establish the National Ocean Council, and to establish a comprehensive, integrated national policy for the stewardship of the Nation's ocean, coasts, and Great Lakes. This order provides a process for the development of ecosystem-based coastal and marine spatial planning (CMSP), through the work of the regional planning bodies. As described within the recommended framework, CMSP would take a regional approach to the development of CMS plans, including planning for multiple existing and emerging uses, such as offshore wind energy facilities. At the same time, BOEMRE's "Smart from the Start" initiative established a process for the leasing of sites for offshore wind energy facilities. However, BOEMRE's process is being conducted on a state-by-state basis and is focused on only a single sector -- offshore wind. At this point, it is unclear how these two parallel processes will intersect in a cohesive and comprehensive manner.

As this project moves forward into the permitting phase, please be aware that of the 13 species managed by MAFMC, a number of them (summer flounder, scup, black sea bass, surfclams, *Loligo* squid, Atlantic mackerel and butterfish) can be found in the water column or are in/on the Essential Fish Habitat (EFH) that underlies the "foot print" of this proposed windmill farm. Numerous other species of fish managed by the New England Fishery Management Council, the South Atlantic Fishery

Management Council and the National Marine Fisheries Service Highly Migratory Division also have identified EFH in this area.

As you might expect, significant commercial fisheries occur within this area. Vessels trip report (VTR) data for fisheries along the Atlantic Coast identify commercial landings from the call area for over 100 species of fish and invertebrates between the years 2000 and 2010. Additionally, landings of 2.4 - 30.2 million pounds were reported from the area from six important commercial fisheries (Table 1). Reported fishing activity in the call area during the same timeframe indicated 506 unique vessels with more than two thousand vessel crew members from 97 separate coastal communities (Table 2). In addition, the extent to which the recreational fishing community uses the call area is unknown but would only add to the number of citizens whose livelihoods should be considered. As such, a dialog with the affected fishing public is needed to proactively identify development areas that will not unreasonably disenfranchise their historic use of the area.

We have other concerns as well. First, it is important to consider that electromagnetic disruption will likely occur at the proposed project site and has the potential to alter migratory patterns of fish sensitive to such changes. Also, the impact of wind turbines and scour mats on oceanographic processes is still an open question and may adversely affect the local habitat of these species. In addition, National Standard 10 of the Magnuson Fishery Conservation and Management Act requires that our regulatory actions "promote safety of life at sea" and it is our understanding that the U.S. Coast Guard may have concerns with its ability to deploy air search and rescue operations within the proposed project area. If this is so, then this proposed windmill farm has the potential to compromise the safety of fishermen when they are engaged in fishing activities in the proposed area.

We are also concerned that an Environmental Assessment (EA) rather than a full Environmental Impact Statement (EIS) is being conducted. An EA would allow developers to begin the developmental process, "which has been the standard" (Director Michael Bromwich, statement on BOEMRE website 5/4/2011). We believe that a full EIS is needed to address the fisheries issues associated with this type of project -- as well as the other issues of marine mammals, migratory birds, endangered species, transportation, safety and security. We understand that in a secondary phase prior to construction, an EIS will be prepared by the applicant that will examine the tradeoffs between energy sources and other uses. However, we believe that a full EIS is needed before any further activity is undertaken.

At our next Council meeting in Port Jefferson, NY, June 14 - 16, we will be discussing this project. We have been assured that should our stakeholders wish to provide comments after that meeting, they can and those comments will be considered. We look forward to working with BOEMRE to clearly establish the process for input of data and other information as well as the concerns of the MAFMC and their stakeholders. Thank you for the opportunity to provide our comments. Should you have any questions, please contact Dr. Tom Hoff of my staff.

Sincerely,



Christopher M. Moore Ph.D.
Executive Director

cc: Anderson, Greene, Hooker, Kray, Kurkul, Robins

Table 1. Atlantic Coast fisheries with significant harvest from within the NJ call area (2000 – 2010).

Species	Landings (lbs)
MENHADEN, ATLANTIC	30,162,874
MACKEREL, ATLANTIC	6,227,150
MONKFISH	3,416,568
CROAKER, ATLANTIC	2,881,098
SCALLOP, SEA	2,666,005
HERRING, ATLANTIC	2,401,245

Table 2. Fishing ports as well as the number of vessels and crew associated with fishing activity within the NJ call area (2000 – 2010).

Port	N_Vessels	N_Crew
CAPE MAY, NJ	95	489
BARNEGAT LIGHT, NJ	67	231
ATLANTIC CITY, NJ	29	103
OCEAN CITY, MD	26	92
NEW BEDFORD, MA	22	140
POINT PLEASANT, NJ	20	74
NEWPORT NEWS, VA	18	188
BELFORD, NJ	12	32
BEAUFORT, NC	12	45
MONTAUK, NY	9	42
WILDWOOD, NJ	8	32
NEW BERN, NC	8	32
SEA ISLE CITY, NJ	8	17
Other (84 ports)	172	724
Total	506	2,241

