



MASSACHUSETTS FISHERMEN'S PARTNERSHIP, INC

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Women of Fishing Families

October 3, 2022

Zachary Jylkka
Bureau of Ocean Energy Management
Office of Renewable Energy Programs
45600 Woodland Road
Sterling, VA 20166

Dear Mr. Jylkka,

Thank you for the opportunity to provide input into the Bureau of Ocean Energy Management's (BOEM) Request for Information on commercial offshore wind leasing in the Gulf of Maine (GOM).

The Massachusetts Fishermen's Partnership (MFP) is writing to express our concerns about offshore wind development (OSW) in the GOM. It is undeniable that wind energy projects will result in uncertain negative impacts to the unique and valuable marine ecosystem in the GOM, lead to devastating consequences to the fishing industry, catastrophic impacts to the local economy, and unknown hardships to the fishing communities. Although we are uncertain about the extent of future environmental and socio-economic effects of OSW developments, we already know that such projects will harm both the environment and the local fishing-related economy.

The Massachusetts Fishermen's Partnership (MFP) was formed in 1995 so that the fishing industry in Massachusetts can speak with one voice. The MFP now represent over 4,000 commercial fishermen and 16 commercial fishing member organizations throughout MA and plays an integral part promoting the common interests and economic viability of commercial fishermen and fishing families—including facilitating new collaborative research and grant programs, increasing business opportunities for vessels and shoreside businesses, and encouraging effective co-management of marine ecosystems.

The MFP leadership recognizes the need for renewable offshore energy and the fishing industry to co-exist. We believe it is possible to have both clean energy and clean protein, and the fishing industry has worked proactively to develop strategies to work alongside this nascent industry. However, offshore clean energy should not come at the expense of fishermen, small commercial fishing businesses, the health of the marine environment or our national food security

The New England commercial fishing industry provides a critical local seafood source to our nation and is a steward of the ocean. This industry has been sustainably harvesting seafood in the GOM for over 400 years and embraces the responsibility of safeguarding the oceans and the sustainability of the seafood resources. Local fishermen rely on the health of the GOM system and a sustainable fishery. These fishermen operate following the Magnuson–Stevens Fishery Conservation and Management Act, under the U.S. Department of Commerce, under the most restricted fisheries management regulations and sustainable fishing in the world.

Local fishermen and fishing communities have many years of experience and knowledge of the GOM ecosystem and fisheries at a finer scale. The commercial fishing industry is on the front line of the effects of climate change and will be among the most impacted by warming oceans. Also, this industry faces the unknowable impacts of ocean industrialization.

The commercial fishing industry should be at the forefront of all discussions relating to leasing our oceans, and mostly, should be directly in any decision-making process along the way. BOEM must work with local fishermen and industry to guarantee the protection of the GOM including reducing the impacts from OSW to the fishing industry.

BOEM should partner with local fishermen, fishing industry, scientists, and agencies to conduct proper studies prior to identifying potential areas for offshore wind development in the GOM. Local fishermen and fishing communities have many years of experience and knowledge of the GOM ecosystem and fisheries at a finer scale. Local fishermen rely on the health of the GOM system and fisheries. Integrating the knowledge of fishermen into the planning process of offshore wind in the GOM is critical.

We strongly recommend that BOEM:

- slows down the development of any OSW projects in the GOM,
- properly engages local fishermen and scientists in the process of planning and collecting critical data to improve our understanding of floating turbine technology, impacts to the environment, and impacts to fishing industry and local communities,
- establishes funding and mechanisms that support a transparent and collaborative efforts to better understanding of the threats that OSW development poses to our fishing communities, food security, and vital ocean resources, and
- integrates such critical information in the planning and decision-making processes of OSW projects.

The MFP warmly welcomes any partnerships and opportunities to assist BOEM in the development of meaningful collaborative efforts.

Thank you for your consideration of these comments. Please do not hesitate to reach out if we can provide additional information or clarification.

Sincerely,


Angela Sanfilippo

MFP Executive Director