



New England  
Fishery Management  
Council



MID-ATLANTIC  
FISHERY MANAGEMENT COUNCIL

June 4, 2018

Bureau of Ocean Energy Management  
Office of Renewable Energy Programs  
45600 Woodland Road (VAM-OREP)  
Sterling, Virginia 20166

Dear Sir/Madam,

Please accept these comments from the Mid-Atlantic Fishery Management Council (Mid-Atlantic Council) and the New England Fishery Management Council (New England Council) on the “Call for Information” for the New York Bight Call Area, which includes four large areas totaling approximately 1.8 million acres within the New York Bight that could potentially be identified as wind energy areas for future development.

The Mid-Atlantic Council manages more than 64 marine species with 7 fishery management plans (FMPs) in federal waters and is composed of members from the coastal states of New York to North Carolina (including Pennsylvania). Fourteen species are managed with specific FMPs, and over 50 forage species are managed as “ecosystem components” within the Council’s FMPs. The New England Council has primary management jurisdiction over 28 marine fishery species under 9 FMPs in federal waters and is composed of members from Connecticut to Maine. In addition to managing their primary fisheries, the Councils have enacted measures to conserve fish habitat, protect deep sea corals, and manage forage fisheries sustainably. The marine fisheries managed by the Councils are profoundly important to the social and economic well-being of communities in the Northeast U.S. and provide numerous benefits to the nation, including domestic food security.

The Councils support policies for U.S. wind energy development and operations that will sustain the health of marine ecosystems and fisheries resources. While the Councils recognize the importance of domestic energy development to U.S. economic security, they also note that the proposed New York Call Area is important in social, economic, and cultural currency to the fishing communities of the region. As such, the Councils recommend that areas that are identified as critically important to these fisheries and the communities they support should be removed from consideration for further offshore wind development. Specifically, the commercial fisheries for butterfish, Atlantic mackerel, Atlantic sea scallop, Atlantic surfclam and ocean quahog, longfin and *Illex* squid, and summer flounder, scup, and black sea bass appear to be highly impacted commercial fisheries across parts of the Call Area. Further, there are numerous recreational fisheries that operate within the proposed Call Areas, including recreational tuna and marlin tournaments.

As you are aware, under the Magnuson-Stevens Fishery Conservation and Management Act the Councils identify essential fish habitat for managed fisheries resources. Some sensitive habitats that may occur in the proposed Call Area include sand waves, cobble/gravel, or other unique bathymetric

features, as well as areas of high spawning activity for some species. Further site-specific evaluations are needed within the Call Area to determine potential locations of sensitive habitats or high spawning activity that also may not be suitable for further wind development. The potential Call Areas also overlap with high populations of surfclam, ocean quahog, and scallops; sessile species with limited mobility may be more susceptible to habitat impacts from wind development.

The National Marine Fisheries Service (NMFS) is providing detailed comments and analytical products that describe our fisheries, essential fish habitat, endangered and protected resources, and other considerations related to the marine environment for the Call Areas. The Councils support these comments and they should be referenced in concurrence with this letter.

We are pleased that BOEM has extended the comment period through the end of July. This will allow the Councils, stakeholders, and state and federal fisheries agencies time to provide additional information on the site conditions, fishery resources, and fishery activities that are in proximity to or within the call area.

The Councils look forward to working with Bureau of Ocean Energy Management to ensure that any wind development in our region minimizes impacts on the marine environment and can be developed in a manner that ensures coexistence of our fisheries with future wind development activities.

Please contact us if you have any questions.

Sincerely,



Dr. Christopher M. Moore  
Executive Director, Mid-Atlantic Fishery Management Council



Mr. Thomas A. Nies  
Executive Director, New England Fishery Management Council

cc: M. Bachman, J. Bennett, J. Coakley, W. Cruickshank, W. Elliott, M. Luisi, C. Oliver, J. Quinn,  
T. Stockwell