



December 16, 2021

Tershara Matthews
Chief, Office of Emerging Programs
Bureau of Ocean Energy Management (BOEM)
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123

Dear Ms. Matthews,

On behalf of the Gulf of Mexico Reef Fish Shareholders' Alliance (Shareholders' Alliance), please accept this letter providing comment on the "Request for Information: Commercial Leasing for Wind Power Development on the Outer Continental Shelf in the Gulf of Mexico; Request for Comments" (BOEM-2021-0077-0001). and look forward to continued collaboration.

The Shareholders' Alliance is the largest organization of commercial grouper and snapper fishermen in the Gulf of Mexico, with membership in all five states that border the Gulf of Mexico. We work hard to ensure that our fisheries are sustainably managed so our fishing businesses can thrive and our fishing communities can exist for future generations. We are the harvesters that provide much of the American public with a reliable source of domestically-caught wild Gulf seafood, and we do this through a philosophy that sustainable seafood and profitable fishing businesses depend on healthy fish populations.

It is with this in mind that we offer the following initial feedback and recommendations on the decision-making process by which offshore wind develops in the Gulf of Mexico. We appreciate the opportunity to inform this decision-making process, and look forward to continued collaboration and meaningful input throughout this effort.

Executive Summary

The Shareholders' Alliance supports clean, renewable energy solutions like offshore wind. We believe that this growing industry can coexist with the commercial fishing and seafood industry in the Gulf of Mexico. This harmony is predicated on establishing and following through with a decision-making process that's inclusive, stakeholder-driven, meaningful, transparent, accountable, and science-based. Minimizing, if not completely avoiding, spatial and temporal conflict between user groups is a top priority. We look forward to our partnership with BOEM, and the collaboration between BOEM and NOAA Fisheries, which will deliver solutions that improve the health and operations of our commercial fishing businesses, coastal communities, fishery management process, Gulf of Mexico ecosystem, and natural environment as a whole.

Broad Opportunities with Offshore Wind

Offshore wind presents a range of potential environmental and economic opportunities as a source of clean, domestic energy production. If implemented properly, offshore wind could reduce our collective carbon footprint, support domestic industries, and create meaningful local employment opportunities and infrastructure. At sea, these structures could create artificial habitat and structure that could improve fish stock health and facilitate fish migration patterns. Mitigation and compensation strategies could serve to buttress ecosystem science and data collection that support sustainable fishery management measures.

General Challenges and Threats to the Gulf of Mexico Ecosystem

Offshore wind could also pose a myriad of hazards if these programs are rushed and ineffectively implemented. At sea, the network of structures and cables could be difficult and expensive to maintain. Commercial fishermen could be displaced from traditional fishing grounds as turbines and arrays effectively become no-take marine protected areas (MPAs); further, these structures may prevent access to future fishing opportunities as fish stocks move and the Gulf of Mexico marine ecosystem shifts due to climate change and other factors. Fish migration and spawning patterns may be inhibited by these structures. Further, there could be direct and indirect fish and protected species mortality and natural habitat loss associated with the survey, development, installation, maintenance, and decommissioning of these structures; the impacts of which could become amplified if these offshore wind structures end up generating a net gain in suitable artificial habitat (see above). The surveys, structures and exposed lines could damage commercial fishing gear (as we have seen in other regions), and could create critical gaps in fishery survey and data collection programs. Environmental pollution, disruption of vessel traffic, and obstructions to safe vessel navigation could all occur. On land, working waterfronts and seafood supply chain infrastructure could be displaced. Without sufficient collaboration between BOEM and fishery managers (e.g., NOAA Fisheries, Gulf of Mexico Fishery Management Council (Gulf Council)), there could be ineffective or inappropriate conflict between the offshore wind and the commercial fishing industry. The cumulative impacts of offshore wind could be underestimated if these effects aren't fully analyzed through the entirety of the nation's seafood supply chain.

Guiding Principles for Collaboration

The Shareholders' Alliance offers the following four guiding principles as a framework that could facilitate the coexistence of offshore wind and commercial fishing in the Gulf of Mexico:

- Commercial fishermen should be considered partners and be meaningfully engaged throughout the process with a reasonable expectation of informing the results.
- The establishment of offshore wind in the Gulf of Mexico should be a deliberative and iterative process informed and improved by successes and challenges experienced in other regions.
- Decision-making processes should be inclusive, stakeholder-driven, meaningful, transparent, accountable, and science-based.
- BOEM and NOAA Fisheries should develop a common vision and strategies for success, including a data sharing plan, and work in partnership to fully understand their respective roles, responsibilities, processes, and regulations.

Recommendations to BOEM

The Shareholders' Alliance offers the following initial recommendations for consideration during this call for information:

Outreach and Data Collection

1. Prioritize meeting with commercial fishermen in coastal communities in Texas and Louisiana.

We appreciate the outreach and communications that have happened to-date, as BOEM staff have been proactive and communicative with commercial fishermen over the last few months. We recommend that a series of in-person meetings and workshops take place at the community level where commercial fishermen and BOEM staff can review nautical charts, fishing logbooks, and other commercial fishing data at a fine scale spatial and temporal level. Relevant commercial fishing communities/areas should include but should not be limited to:

- Port Isabel, Texas
- Corpus Christi, Texas
- Port O'Connor, Texas
- Galveston, Texas (priority)
- Port Arthur, Texas
- Cameron, Louisiana
- Port Fourchon, Louisiana
- New Orleans, Louisiana (we are looking forward to the January 2022 meeting here)

To this point, the “call area” is too large to be able to reasonably provide effective comment on – at 30 million acres, it’s like asking commercial fishermen to comment on turbine placement “throughout the entire state of Mississippi” or “in an area three times the size of Switzerland.” If there are areas that are currently known to be desired by developers, these areas should be identified and prioritized for specific commercial fishing feedback and review. Further, if there are areas that are currently known to be likely unsuitable for use (e.g., areas relating to existing oil and gas infrastructure, sediment resource areas, protected species and habitat, navigation, safety, U.S. Department of Defense uses, socioeconomic and cultural uses, and other outer continental shelf uses) these areas should be identified and removed from consideration.

2. Develop a fishing industry advisory council.

This advisory body should include a diverse suite of representatives from the commercial, charter/for-hire, and private angler sector of fisheries in areas likely to be impacted by offshore wind energy development in the Gulf of Mexico. The National Marine Sanctuary Program’s Sanctuary Advisory Councils serve as an effective template for this effort. This body should be diverse and inclusive, operate in a transparent manner, and provide formal feedback and recommendations to BOEM and the Gulf Council.

3. Enhance engagement with the Gulf Council.

In addition to directly impacting commercial fishermen, the decisions BOEM makes will impact fishery managers and fishery management plan development. We appreciate BOEM initially presenting information about this process to the Gulf Council earlier this year, and recommend additional regular updates including the development of a document that outlines a vision for how the Gulf Council and BOEM can collaborate and share resources. An additional benefit of more regular and formal engagement with the Gulf Council is the added access this will provide BOEM to the commercial (and charter/for-hire fishermen and private anglers) that attend Gulf Council meetings in-person or virtually.

4. Develop “best practices” for successful wind energy introduction.

Offshore wind energy has already been attempted or introduced in other commercial fishing regions, and has suffered mixed results. It is clear that many commercial fishermen and industry organizations

in those regions continue to have strong concerns and have identified a suite of challenges – both potential and realized – that were not adequately addressed in those processes. We recommend that BOEM build on prior experiences and “lessons learned” from those regions to develop a public guide for how to avoid those pitfalls in the Gulf of Mexico.

5. Ensure cumulative impacts analysis includes the seafood supply chain.

Direct and indirect impacts, both positive and negative, of offshore wind development in the Gulf of Mexico do not stop at the vessel/fisherman level; they reverberate throughout the seafood supply chain, including with fish houses, wholesale operations, retail operations, and restaurants, right down to the seafood consumer him/herself. Any socio-economic analyses conducted as part of these efforts should fully include impacts on these important stakeholder groups.

6. Access existing federal and private sector datasets.

Commercial fishermen generate a wealth of scientific data with every fishing trip they take, including but not limited to precise catch and effort data, fine scale spatial and temporal data during fishing and transit, and detailed economic data. Specifically, commercial reef fish fishermen in the Gulf of Mexico complete vessel logbooks and trip tickets, run vessel monitoring systems, operate various chart plotter system, and in some cases even use electronic video camera systems. NOAA Fisheries’ Southeast Fisheries Science Center and Southeast Regional Office can provide a wealth of these data to BOEM upon request. The federal Aquaculture Opportunity Area process has prioritized this analytical approach and has developed extremely impressive datasets that are successfully informing that process, and we recommend that BOEM develop a similar process for offshore wind development.

Siting

7. Avoid placing wind energy infrastructure in or around commercial fishing areas.

We strongly recommend that turbines, cables, and other related infrastructure be installed outside areas of commercial fishing activity. Doing so will minimize conflict and facilitate successful development of offshore wind energy in the Gulf of Mexico. Furthermore, we recommend that BOEM work with commercial fishermen and NOAA Fisheries to assess local ecological knowledge and predictive models to predict how species – and therefore commercial fishing effort – may shift spatially in the future (i.e., for the life of the lease/infrastructure) as a response to changes in climate and the Gulf of Mexico ecosystem. Installation of wind energy infrastructure should avoid areas likely to become commercial fishing grounds in the future.

8. Wind energy infrastructure locations should not become *de facto* MPAs.

Commercial fishermen should have maximum maneuverability around wind energy infrastructure, including the ability to fish on and tie up to these structures. This is consistent with operations around existing oil platforms, and for years we have demonstrated the ability to safely and responsibly do this. Doing so will minimize economic harm to our businesses and will increase safety at sea during rough weather.

Monitoring and Evaluation

9. Develop and publish a comprehensive monitoring and evaluation plan.

Whether we’re talking about a commercial fishing business plan, fishery management plan, or plan for offshore wind development in the Gulf of Mexico, there should be clear goals and objectives, an assessment benefits and harms, and a process by which monitoring and evaluation takes place. We look forward to collaborating on the full comprehensive assessment of any offshore wind infrastructure siting including predictions of such things as levels of energy expense reduction and projections of

amounts of clean energy produced, etc. In effect, we need to know what “success” looks like, how we know if it is achieved, and what happens if it is not.

Mitigation and Compensation

10. Establish an ecosystem science fund.

We recommend that a trust be established to fund collaborative research in the Gulf that could serve the purpose of filling gaps in fishery surveys as a result of disruptions associated with offshore wind infrastructure installation. This fund could also prioritize other collaborative ecosystem science that could address ecological concerns raised during this process (i.e., disruptions to fish migratory patterns, identification of essential fish habitat, etc.) that could facilitate subsequent offshore wind efforts in this region. Science and data should drive the decisions associated with this process, so this process should generate a net benefit in Gulf of Mexico ecosystem science and data. To that end, we recommend identifying and executing opportunities for offshore wind turbines to act as a network of data collection platforms where, for example, installed sensors can collect oceanographic (e.g., temperature, salinity), ecological (e.g., fish abundance, radio frequency tagging) and fishery (e.g., private angler fishing effort) data on a continuous basis.

11. Establish a compensation fund.

While compensation is often a last resort, after attempts at avoiding conflict followed by minimizing negative effects, additional trust(s) should be established to compensate commercial fishermen for lost or damaged gear, loss of fishing grounds, loss of market access, etc., as well as other economic losses to seafood supply chain participants. This fund should also fully cover any environmental cleanup, or other potential expenses related to these structures.

Conclusion

Offshore wind energy holds promise for the Gulf of Mexico and for our planet at large, but we are not willing to sacrifice our businesses, our coastal communities, and our fishery resources to achieve it. We firmly believe that with a strong partnership between BOEM, NOAA Fisheries, and the Gulf’s commercial fishermen, these two industries can be complimentary rather than competing. This can be achieved by collectively establishing and following through with a decision-making process that’s inclusive, stakeholder-driven, meaningful, transparent, accountable, and science-based.

Thank you again for the opportunity to engage in this process, and we look forward to continued collaboration moving forward.

Sincerely,



Eric Brazer

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