



January 7, 2022

**Submitted via: <http://www.regulations.gov>**

U.S. Department of the Interior

Re: Docket No. BOEM-2021-0083, Request for Information (“RFI”)  
Guidance for Mitigating Impacts to Commercial and Recreational Fisheries  
From Offshore Wind Energy Development

To whom it may concern:

The National Ocean Industries Association (“NOIA”) appreciates the opportunity to provide comments on the above-referenced request for information by the Bureau of Ocean Energy Management (“BOEM”) on the impacts of offshore wind development. An almost 50-year-old organization, NOIA represents all segments of the offshore energy industry. This includes leasing and development of traditional fossil fuels such as oil and gas, primarily in the Gulf of Mexico, but also important new sources of energy like offshore wind. Further, our members include not just energy developers, but also the businesses large and small that do the work of building, supplying, and maintaining these projects. In other words, we represent thousands of blue-collar and white-collar employees stretching from New England to the Gulf Coast and across the nation. In fact, NOIA members have been critical in building out not only the pioneering turbines off the coasts of Northern Europe, but also the limited yet growing number of turbines in U.S. waters.

As an organization, NOIA strongly supports ongoing attempts to build new offshore wind resources in federal waters. Offshore wind projects will prove vital to the economic growth of this country and efforts to meet climate goals for the 21<sup>st</sup> century. According to recent estimates, we have a \$70 billion<sup>1</sup> market off America’s coasts for wind in the next 10 years. That means renewable, reliable energy in places like New England, New Jersey, and New York, where building infrastructure onshore is famously difficult and industrial growth has sometimes been hard to come by.

### **Climate Change And Beneficial Impacts For Fisheries:**

While we understand that not all stakeholders in the fishing community are interested in seeing offshore wind developed, there will be beneficial impacts from the emerging offshore wind sector.. At the very least, we have seen that fishermen can find meaningful work aiding the rollout and development of offshore wind projects through seasonal labor in areas like scout work and monitoring.<sup>2</sup> Critically though, we feel BOEM should do its best to avoid missing “the forest for the trees” and remember the critical role that allowing a renewable energy boom will play in combating climate change. Climate change is well-established as a potential threat to

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<sup>1</sup> <https://www.cnbc.com/2019/12/13/us-has-only-one-offshore-wind-farm-but-thats-about-to-change.html>

<sup>2</sup> <https://www.workboat.com/wind/fishermen-provide-scouting-monitoring-for-offshore-wind>



fisheries and fishing communities<sup>3</sup>. In fact, an article in the journal *Science* found that in the last century weather-related factors have slashed the productivity of marine fisheries globally by 4.1% and in some areas by a staggering 35%.<sup>4</sup> According to this research, our oceans have absorbed some 90% additional warming in the last 10 years, which has increased the acidification of the seas, driven cold-water species out of their traditional ranges, disrupting the ability of oysters, clams, crabs and other species to fully develop, and impairing or harming a host of other aquatic life forms.<sup>5</sup> The fishing community therefore has a vested interest in co-existing—and thriving—alongside what may prove to be a pivotal renewable energy boom in this country. Offshore wind is uniquely situated to not only offset dated legacy fossil-fuel plants<sup>6</sup>, but is already proving to be a key point as this country’s leaders negotiate on global climate policies on the world stage.<sup>7</sup> Secretary Haaland issued a *global* offshore wind challenge at COP26—we have an opportunity to lead, and getting this right at home will be a key piece in our approach to addressing climate change across borders and continents.

While addressing climate change would provide long-term benefits for fisheries, there are other, shorter term benefits for coastal communities. Global studies have found that offshore wind can increase the population of certain fish species.<sup>8</sup> For example, according to studies in Europe, “researchers found evidence that the wind turbines not only attracted fish, providing both shelter and food (from the organisms that grew on the turbines), but also served a role in their life cycle, with young fish attracted to the wind farm where they would grow, then leave to spawn, and then other juveniles would come to the wind farm to grow.”<sup>9</sup> Not only has BOEM referenced this positive “reef effect” wind turbines can create<sup>10</sup>, it is also well known here in the U.S. that that fishermen often seek out the red snapper that congregate near oil and gas facilities and other offshore structures in the Gulf of Mexico<sup>11</sup>. Off of California, studies demonstrate that the creation of fixed-bottom structures have and continue to host marine ecosystems that lead to both commercial and recreational opportunities for the fishing community.

### **Addressing Deeper Differences**

As directed by statute, federal waters are a public resource that must be shared by multiple stakeholders for multiple uses, with decision-making in place to avoid conflict as much as possible. The Gulf of Mexico is an excellent example of diverse stakeholders not only successfully coexisting, but also supporting each other. This includes the energy industry, recreational and commercial fishing, the military, and the tourism industry. Although fishing

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<sup>3</sup> <https://www.msc.org/what-we-are-doing/oceans-at-risk/climate-change-and-fishing>

<sup>4</sup> <https://www.science.org/doi/10.1126/science.aaw5824>

<sup>5</sup> <https://blog.nwf.org/2020/07/how-fish-are-being-affected-by-climate-change/>

<sup>6</sup> <https://www.liherald.com/stories/ef-barrett-generation-station-in-island-park-to-follow-new-dec-guidelines,121588>

<sup>7</sup> <https://www.doi.gov/pressreleases/secretary-haaland-issues-global-offshore-wind-challenge-un-climate-change-conference>

<sup>8</sup> <https://www.sciencedaily.com/releases/2012/04/120410093318.htm>

<sup>9</sup> <https://seagrant.gso.uri.edu/offshore-renewable-energy-improves-habitat-increases-fish/>

<sup>10</sup> <https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/SFWF%20FEIS.pdf>

<sup>11</sup> <https://www.saltwatersportsman.com/red-snapper-winter-season-texas/>



communities along the east and west coast have grown accustomed to a freer hand in this space, the federal government is in a position to effectively work with the offshore wind sector and impacted stakeholders to avoid, mitigate, or potentially compensate for impacts.

To help avoid and mitigate impacts, our industry has consistently sought fair turbine layouts within Wind Energy Areas to ensure that vessels can safely and predictably transit these areas and return catches to harbor—though tighter grouping of turbines could likely allow for more economic energy production. We are also proud that member companies have worked to improve fisheries science, funded trawl surveys and the like to check the health of commercial fisheries, and generally worked to advance research in the space.<sup>12</sup> BOEM should continue to encourage efforts to strike a reasonable balance between energy production and fisheries, and the bureau should continue to support mitigation and research funding as part of a continuous improvement cycle.

NOIA continues to consider the issue of compensation and potential approaches for managing the issue, in the wake of initial efforts seen in the last few years. As a foundational principle, BOEM should consider compensation programs that are designed with standards on a regional basis rather than project-by-project, which makes them more predictable both for wind developers and for fishermen. Clearly, BOEM will also need to bring in state and local partners for that discussion, given the acute interest of these officials in the long-term health of both industries.

In the medium-to-longer term, it could be of value for Congress to adopt offshore wind revenue sharing and dedicate a portion of that funding for fisheries programs, port infrastructure modernization, and the like. Revenue sharing has been widely successful in the Gulf of Mexico for oil and gas development and providing funding for coastal resiliency for the Gulf region, and a similar model—for fisheries programs—could be considered for offshore wind.

**Conclusion:**

Offshore wind and commercial fishing can co-exist in a way that provides a living—and electricity—to people across the region. Successful coexistence among these industries has been demonstrated in the experience of the offshore wind industry in Europe and by the U.S. energy industry in the Gulf of Mexico. We encourage BOEM to recognize this, recognize the manageable impacts of offshore wind, and help these projects move forward in a way that allows both industries to thrive.

Very respectfully,

A handwritten signature in black ink, appearing to read "Erik Milito".

Erik Milito

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<sup>12</sup> <https://www.vineyardwind.com/fisheries-science>



President  
National Ocean Industries Association