



Mid-Atlantic Fishery Management Council

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Michael P. Luisi, Chairman | G. Warren Elliott, Vice Chairman
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August 7, 2017

Ms. Kelly Hammerle
National Program Manager
BOEM
45600 Woodland Road
Mailstop VAM-LD Sterling, VA 20166

Dear Ms. Hammerle,

Please accept these comments from the Mid-Atlantic Fishery Management Council (Council) on the development of a New National Outer Continental Shelf (OCS) Oil and Gas Leasing Program for 2019-2024.

The Council has management jurisdiction over 13 marine fish species¹ in federal waters and is composed of members from the coastal states of New York to North Carolina (including Pennsylvania). The Council manages its fisheries throughout their range and develops fishery management plans to achieve its vision of “Healthy and productive marine ecosystems supporting thriving, sustainable marine fisheries that provide the greatest overall benefit to stakeholders.” This includes actions to conserve fish habitat, protect deep sea corals, and manage forage fisheries sustainably. The fisheries for the Council’s managed species are prosecuted in the Mid-Atlantic and Northeast exclusive economic zone and are within two of BOEM’s oil and gas leasing areas.

Marine fisheries are profoundly important to the social and economic well-being of Mid-Atlantic communities and provide numerous benefits to the nation, including domestic food security. In 2015, the commercial seafood industry in the Mid-Atlantic region supported 100,954 jobs, \$13.9 billion in sales, \$3.2 billion in income, and \$5.1 billion in value added impacts across the Mid-Atlantic.² Commercial fishermen landed 648 million pounds of finfish and shellfish, earning \$512 million in landings revenue, while 2.0 million recreational anglers took 12.4 million fishing trips and spent nearly \$3.5 billion on trip and equipment expenditures.²

The Council supports U.S. energy development that sustains the health of the marine ecosystem and fishery resources while minimizing environmental risks. The environmental risks associated with offshore oil development are not consistent with the Council’s vision. The Council believes that renewable energy, if implemented in a manner which minimizes impacts on fish habitat and fisheries,

¹ Summer flounder, scup, black sea bass, bluefish, spiny dogfish, Atlantic surfclam, ocean quahog, golden tilefish, Atlantic mackerel, longfin and shortfin squids, butterfish, and monkfish.

² National Marine Fisheries Service. 2017. Fisheries Economics of the United States, 2015. U.S. Dept. Commerce, NOAA Tech. Memo. NMFS-F/SPO-170, 247p. Available at: http://www.st.nmfs.noaa.gov/Assets/economics/publications/FEUS/FEUS-2015/Report-Chapters/FEUS%202015-AllChapters_Final.pdf

may be more consistent with the its vision. The Council's Policy on Offshore Oil (attached) should be considered with these comments, and can also be found at: <http://www.mafmc.org/habitat/>.

Over the past decades, the Council has implemented management programs that support sustainable fisheries and rebuild overfished stocks. These efforts have necessitated sacrifice from the commercial and recreational fishing sectors in the form of economic losses and foregone fishing opportunities. The Council is concerned about the potential for negative impacts on the marine ecosystem and cautions against oil and gas development in the absence of better information to understand the direct, indirect, and cumulative impacts of these activities to the region. A study recently published in *Nature* showed that air guns cause significant mortality to zooplankton populations, even > 1 km from the seismic source.³ Since zooplankton are a part of food chain base, and fish larvae are part of the zooplankton, this new study suggest these activities could have profound negative impacts on our marine resources and the millions of Americans who benefit from them.

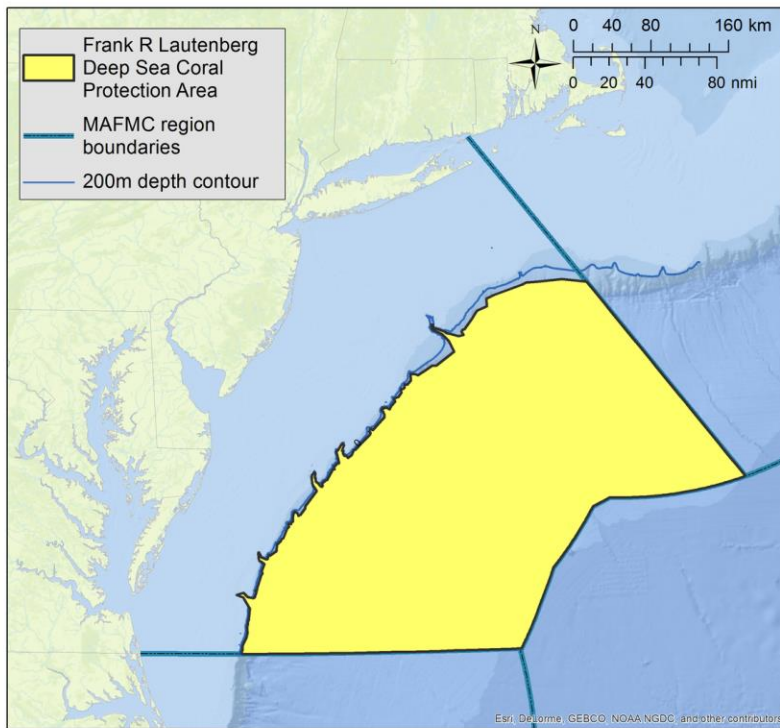
While oil and gas development has been largely focused on potential offshore lease areas, the Council is concerned that impacts of development would not be localized. Impact analyses must consider the cumulative impacts to our region. From the potential expansion of nearshore receiving facilities, the installation of underwater oil pipelines, to the increased sound associated with vessel traffic, the impacts of offshore oil development will have broad and cascading effects on the marine environment from our shorelines to farthest reaches of the Atlantic OCS.

Just the increased propagation of sound from geologic and geophysical activities, such as seismic surveys and increased vessel traffic to transport oil, can impact fish and other living marine resources that depend on sound for their most vital life functions. The National Oceanic and Atmospheric Administration's Ocean Noise Strategy Roadmap⁴ recognizes that "sound is a fundamental component of the physical and biological habitat that many aquatic animals and ecosystems have evolved to rely on over millions of years." The strategy also notes that changes in the acoustic environment caused by human activities "can lead to reduced ability to detect and interpret acoustic cues that animals use to select mates, find food, maintain group structure and relationships, avoid predators, navigate, and perform other critical life functions."

The Council is also concerned that some of the region's most sensitive habitats, which it has worked to protect from the impacts of fishing, may now be at risk. The Frank R. Lautenberg Deep Sea Coral Protection Area, an area the size of Virginia encompassing more than 38,000 square miles of federal waters off the Mid-Atlantic coast, restricted fishing activity to protect slow-growing, fragile deep sea corals from the impacts of fishing gear. The Council is concerned about the reconsideration of the offshore canyons contained within these protection areas that were withdrawn from development consideration by the previous administration. These canyons contain sensitive deep sea corals, function as habitat areas of concern for golden tilefish, and have unique biological and oceanographic features making them both ecologically and economically important to the marine environment and our fisheries.

³ McCauley, R.D., R.D. Day, K.M. Swadling, Q.P. Fitzgibbon, R.A. Watson, and J.M. Semmens. 2017. Widely used marine seismic survey air gun operations negatively impact zooplankton. *Nature Ecology & Evolution* 1. Doi: 10.1038/s41559-017-0195. Available at: <https://www.nature.com/articles/s41559-017-0195>.

⁴ Available at: http://cetsound.noaa.gov/Assets/cetsound/documents/Roadmap/ONS_Roadmap_Final_Complete.pdf.



At present, there is insufficient information about how oil and gas development activities throughout our region may affect fish, marine mammals, benthic communities, and ecosystem structure and function. Given the existing value of living marine resources and our fisheries along the coast, the Council believes it is important to fund research that enables a better understanding of the environmental consequences of these activities.

While the Council recognizes the importance of energy exploration to U.S. economic security, the Council also notes the Mid-Atlantic is rich in marine biodiversity and contains ecologically sensitive areas that are highly important in social, economic, and cultural currency of the region. The Council looks forward to working with the Department of the Interior and its Bureau of Ocean Energy Management to ensure that any future energy development activities minimize impacts on the marine environment.

Please feel free to contact me if you have any questions.

Sincerely,

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

cc: J. Coakley, W. Cruikshank, W. Elliott, M. Luisi, C. Oliver