



## Mid-Atlantic Fishery Management Council

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Michael P. Luisi, Chairman | G. Warren Elliott, Vice Chairman  
Christopher M. Moore, Ph.D., Executive Director

April 17, 2018

Dr. Walter Cruickshank  
Acting Director  
Bureau of Ocean Energy Management (BOEM)  
45600 Woodland Road  
Mailstop VAM-LD Sterling, VA 20166

Dear Mr. Cruickshank,

Please accept these comments from the Mid-Atlantic Fishery Management Council (Council) on the Request for Feedback (RFF) to the proposed “Renewable Energy Path Forward on the Atlantic.”

The Council manages more than 64 marine species with 7 fishery management plans (FMPs)<sup>1</sup> in federal waters and is composed of members from the coastal states of New York to North Carolina (including Pennsylvania). 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.<sup>2</sup> 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.<sup>2</sup>

The Council requests that BOEM extend the comment period for the RFF for at least 90 days. The current comment period is insufficient to complete a review of the factors and metrics important to planning the future of wind lease locations for the entire outer continental shelf. As such, the extension of the comment period will allow the Council and its stakeholders the necessary time to develop meaningful comments on the positive and exclusionary factors for wind development in response to this RFF.

In addition, while BOEM has indicated in the RFF that information on, “marine life, habitat areas, cultural resources, transportation, fishing, and other human uses” will be “considered when new energy

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<sup>1</sup> Fourteen species are directly managed with specific FMPs. These include summer flounder, scup, black sea bass, Atlantic bluefish, Atlantic mackerel, *Illex* and longfin squids, butterfish, Atlantic surfclams, ocean quahogs, golden and blueline tilefish, spiny dogfish (joint with the New England Council), and monkfish (joint with the New England Council). In addition, more than 50 forage species are managed as “ecosystem components” in all seven FMPs. The Council sets possession and landing limits to prevent the expansion of directed fisheries on these forage species in the Mid-Atlantic.

<sup>2</sup> 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](http://www.st.nmfs.noaa.gov/Assets/economics/publications/FEUS/FEUS-2015/Report-Chapters/FEUS%202015-AllChapters_Final.pdf).

or other infrastructure developments are proposed,” we believe that this information should be considered for this early planning process as well.

The Council looks forward to working with Bureau of Ocean Energy Management to ensure that any future wind development activities minimize impacts on the marine environment and can be developed in a manner that ensures coexistence of our fisheries with these energy development sites.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Moore". The signature is fluid and cursive, with a large initial "C" and a stylized "Moore".

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

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