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Mid-Atlantic Fishery Management Council
800 North State Street, Suite 201
Dover, DE 19901

Re: BOEM Guidance for Mitigating Impacts of Offshore Wind Energy Projects on Commercial and Recreational Fisheries (Tab 6)

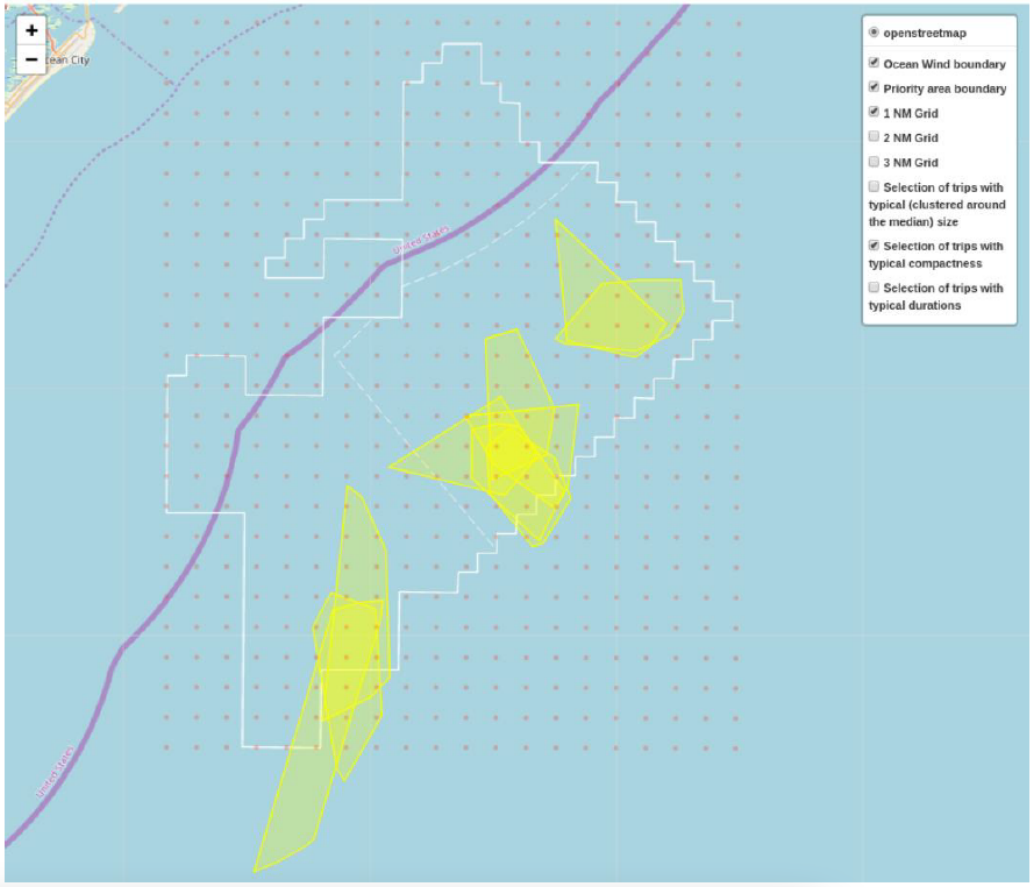
Dear Council Members,

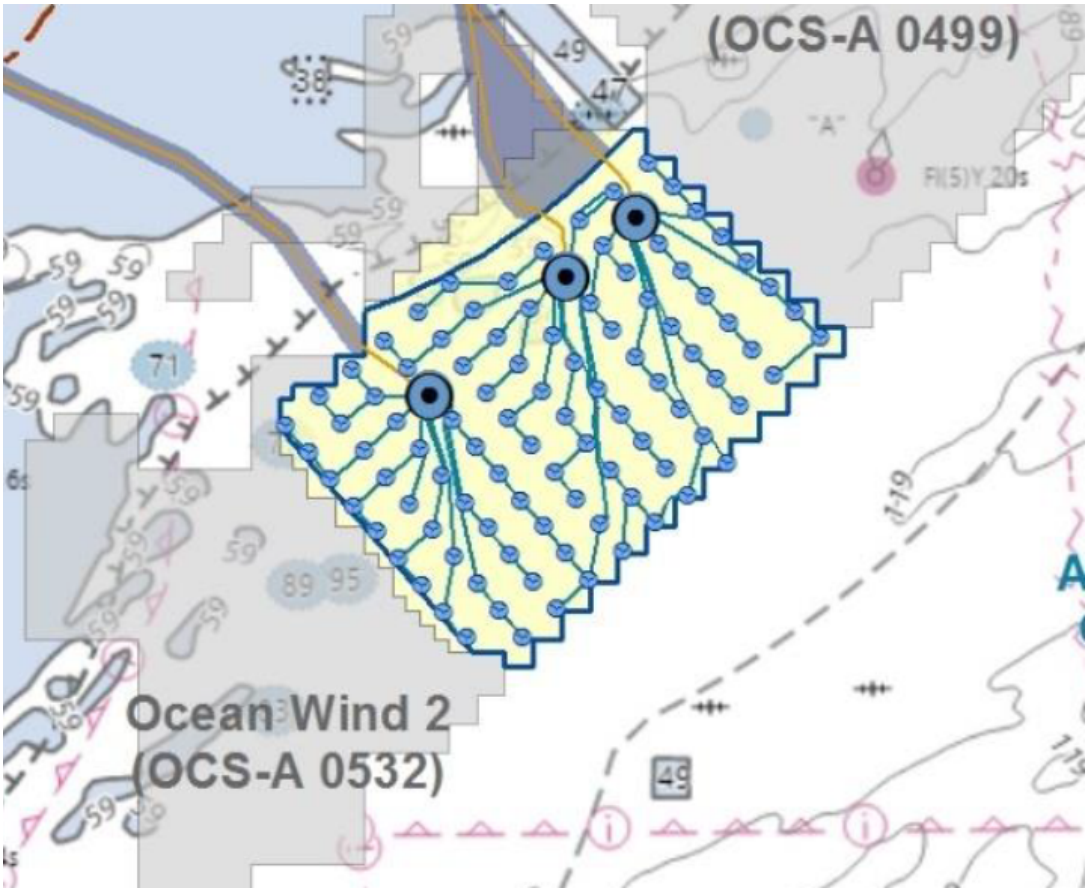
Surfside Foods encourages the Mid-Atlantic, New England, and South Fisheries Management Councils to request that BOEM's ***Guidelines for Mitigating Impacts to Commercial and Recreational Fisheries on the Outer Continental Shelf Pursuant to 30 CFR Part 585*** stresses that fisheries mitigation must go beyond project design where it is foreseeable that a fishery will lose access to the lease area and where resource enhancement outside the lease area is a feasible alternative to Compensation. For the surfclam fishery out of Atlantic City, NJ the cumulative impacts of multiple OSW projects across the region will produce more severe impacts to fishing and supporting communities than merely the additive effects of single projects.

Many mobile gear fishers, such as harvesters of Atlantic surfclam, will be displaced from fishing grounds during offshore wind energy operations due to the spacing of project components and the spatial operational needs of the fishery. Below we show trip polygons of typical fishing trip compactness overlaid with potential wind turbines spaced at 1nm in a grid pattern in the Ocean Wind lease off Atlantic City. The reality is that the grid pattern turbine spacing for Ocean Wind I will be closer than the 1nm spacing depicted with trip polygons and the safe, efficient harvest of Atlantic surfclams will not be possible within the wind lease area during wind energy operations.

Fishing trip shapes within Ocean Wind region

Selected trip polygons overlaid with potential wind turbine grids spaced out at various widths; from all trips 10+ hours long





The Atlantic City, NJ surfclam fleet could experience revenue losses of as much as 25% according to the model development and economic assessment articles in the ICES Journal of Marine Science, 2022, 0, 1–14. The loss of access to offshore wind energy lease areas will result in increased operational competition on the remaining grounds outside of wind project areas and localized overfishing for Atlantic surfclams in the NY Bight would be likely to occure. The Atlantic surfclam (Spisula solidissima) fishery produces over USD 30 million in ex-vessel revenues annually. Together with the fishery for the ocean quahog (Arctica islandica), $55 million in combined annual landings were estimated to generate $1.3 billion in total economic impacts (Murray, 2016). New York Bight wind energy lease areas were responsible for much of the surfclam landings and associated economic impacts in prior years and the loss of these areas to harvest is potentially catastrophic to the fishery.

When all the mitigation measures using turbine spacing, micro siting, row orientation, cable burial, and lighting have been done and a fishery will still lose access to the biomass within the WEA, resource enhancement outside the lease area must be fully explored as a mitigation measure, before compensation. If we want the mid-Atlantic surfclam fishery to co-exist with industrial wind energy operations at the scale being advanced by BOEM we must include resource enhancement for fisheries as mitigation for fisheries where the typical mitigation measures do not meet the requirements of co-existence.

By replacing the resource lost to wind energy development outside these lease areas we retain our harvesters, we retain our fishery, and we avoid all the secondary economic impacts for support businesses such as seafood dealers, fishing industry vendors, processors, and distributors. A report was issued July 5, 2022, looking at what hatchery capacity would be needed to support surfclam fishery mitigation via seeding fishing grounds. Indications are that fishery enhancement is economically viable. The 1-page summary of the assessment is attached.

Thank you for your consideration of our comments,

Thomas Dameron

Tom Dameron
Government Relations &
Fisheries Science Liaison
Surfside Foods, LLC

Assessing the Viability of Large-Scale Hatchery Production for Atlantic Surf Clam

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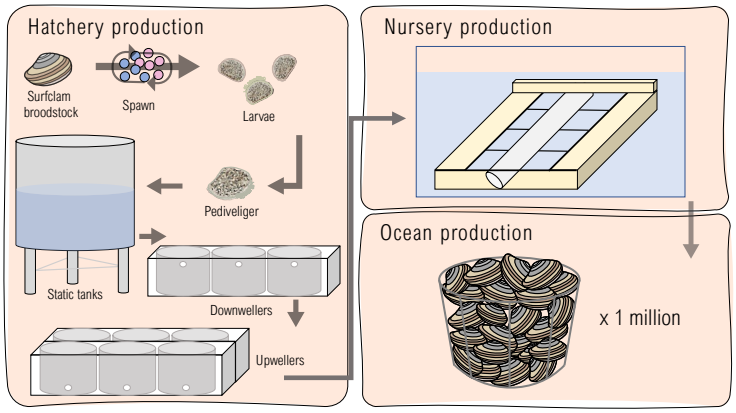
Project Overview

The high demand for renewable energy has stimulated the development of offshore wind farms along the east coast of the United States. Over two million acres are currently leased for the development of offshore wind turbines in U.S. waters (BOEM, 2022). It is expected that the Atlantic surf clam (*Spisula solidissima*) industry will be negatively impacted due to overlap between commercial fishing grounds and wind lease areas. This project uses the best available knowledge about predatory losses, hatchery and nursery growth, and costs of production to explore the economic viability of several large-scale surf clam hatcheries to offset additional costs, reduced revenues, and potential job losses associated with the displacement of the fishing fleet.

Methods

- Reports and primary literature were utilized to understand growth and survival of Atlantic surf clams in hatchery and nursery settings.
- Information on labor, energy, construction, and material inputs and costs for surf clam production were gathered from ~100 sources
- Met with hatchery managers, researchers, and others knowledgeable about shellfish hatchery production
- A techno-economic cost model and Monte Carlo analyses were employed to explore average production costs and their variability.



Results

- To support an annual production of **1M bushels** of surf clams, **88M fishery-sized clams** (>120mm) would need to survive.
- 374M – 2.1B clams are needed at the post-hatchery stage, and 277M – 645M clams are needed post-nursery
- The calculated hatchery costs range from $2.8M - $13.3M and nursery costs range from $800K- $1.8M
- Total costs range from **$3.6M - $15.1M.**

Under current market conditions where surf clams regularly sell for $14-17 per bushel, our analysis suggests that several large- scale surf clam hatcheries **could be** a viable mitigation method to provide **additional fishing opportunity** for the **commercial fishing fleet**. However, costs that are associated with permitting, land acquisition, and ocean harvesting are not included.

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