



*Responsible Offshore Development Alliance*

May 1, 2019

Commandant (CG-NAV-2)/NAVSAC  
Attn: Michael D. Emerson, Director, Marine Transportation Systems  
U.S. Coast Guard  
2703 Martin Luther King Avenue SE, STOP 7418  
Washington, DC 20593-7418

**Re: Atlantic Coast Port Access Route Study: Port Approaches and International Entry and Departure Transit Areas [Docket No. USCG-2011-0351]**

Dear Mr. Emerson,

The Responsible Offshore Development Alliance (RODA) submits the following comments regarding the United States Coast Guard's (USCG) Notice of Study regarding port approaches to ports on the Atlantic Coast of the United States. We respectfully urge the USCG to include a full analysis of fishing vessel transit as it relates to existing, proposed, and potential offshore wind energy areas in the appropriate study ranges.

RODA is a membership-based coalition of fishing industry associations and fishing companies with an interest in improving the compatibility of new offshore development with their businesses. Our Board of Directors consists of representatives of commercial fishing businesses and vessels from federally- and state-permitted Atlantic fisheries from North Carolina to Maine. Currently our membership includes major Atlantic fishing associations, dealers, and affiliated businesses, plus over 120 vessels across nine states operating in approximately 30 fisheries. RODA does not advocate for or represent any one particular fishery; rather, it actively endorses only those positions that are common amongst commercial fishing industry participants, and it offers a platform for gathering input from a broad range of fishery representatives when multiple viewpoints exist.

Our diverse membership is concerned with impacts to their businesses by the numerous areas sited for offshore development along the Atlantic Coast. Some of the biggest unknown consequences from these rapidly developing projects include changing traffic patterns, navigational safety, and port access conflicts. RODA is asking the USCG to expand the original ACPARS study to include impacts to navigation, safety issues and access conflicts related to the development of wind energy areas that are moving forward quickly.

As you know, a large area of the Outer Continental Shelf (OCS) has been leased for offshore wind development without any comprehensive analysis of the fishing industry's need for safe transit or how the installation of large numbers of offshore structures will impact the operations of fishing vessels. Our experience in New England – where the fishing industry was left to “negotiate” with offshore wind energy developers after several sites were leased – showed that explicit analysis needs to occur up front in order to achieve meaningful results. Safety is too important to be left to the discretion of those who

are not navigation experts. Furthermore, these decisions need to be fully informed and vetted by the enforcement agency responsible for resolving conflicts that will arise in the future. The bottom line across both the fishing industry and offshore wind energy developers needs to be the same as the USCG's: safety is our mutual priority. RODA therefore applauds USCG for initiating the MARIPARS study for the lease areas off of New England in order to perform unbiased review and ensure that the industry's needs are fully considered.

RODA requests that USCG perform a similar analysis for Atlantic ports that are not included in the MARIPARS study as part of its upcoming Port Access Route Study (PARS). Recently RODA co-hosted, with the New York State Research & Development Authority (NYSERDA) a workshop to gather feedback related to fishing transit throughout the New York Bight related to areas designated for offshore wind development. A major outcome of the workshop was the expression of a clear and mutual desire from the commercial fishing industry – both operators and representatives – for the USCG to perform a similar study to MARIPARS for other ports in the Atlantic region. A final summary of feedback collected at this workshop is being written and will be shared with USCG once it has been finalized.

RODA encourages USCG to include the full range of traditional and nontraditional data to inform the PARS study. The Federal Register notice states that the “PARS will use AIS data and information from stakeholders to identify and verify customary navigation routes as well as potential conflicts involving alternative activities.” While AIS provides important information to understand movement patterns for some vessels and fisheries (*e.g.*, see attached letter submitted by Wallace & Associates on behalf of the majority of the surfclam and ocean quahog industry harvesters), this data stream is not fully representative of every fishery and vessel in the region and only contains data collected in the past several years. Due to interannual variability in fisheries distribution and management that may require studies using longer time series, broad shifts in stock distribution resulting from changing environmental conditions, and differences among fisheries in AIS reporting, certain vessels' activities are best understood by examining a broader range of data sources. Some of this input was clearly articulated during the RODA/NYSERDA workshop, which several representatives from the USCG in attendance. We therefore encourage USCG to work with the National Marine Fisheries Service (NMFS), RODA members and other fishermen to ensure that this study is performed accurately and inclusively.

RODA and its member organizations thank you for your consideration of this request.

Sincerely,

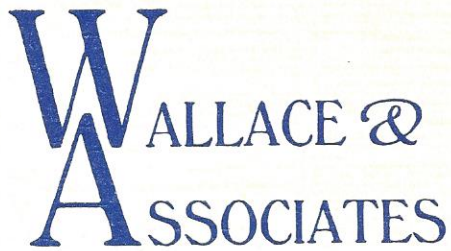
A handwritten signature in blue ink, appearing to read "Annie Hawkins".

Annie Hawkins, Executive Director

A handwritten signature in blue ink, appearing to read "Lane Johnston".

Lane Johnston, Policy Fellow

*Responsible Offshore Development Alliance*



February 28, 2019

The New York State Department of Environmental Conservation  
New York State Energy Research and Development Authority  
Responsible Offshore Development Alliance

Re: Commercial Fishing Transit Lanes and Offshore Wind Energy in the New York Bight

Dear Sir or Madam:

Wallace and Associates (W&A) represents the vast majority of the surfclam and ocean quahog (SCOQ) industry harvesters. This includes forty (40+) Surfclam Ocean Quahog (SCOQ) vessels fishing out of the ports of Oceanside, NY, New Bedford MA, Fairhaven MA, Point Pleasant, NJ, Atlantic City, NJ, and Ocean City, MD. The clam industry is writing to comment on your request for feedback and data related to fishing vessels transiting throughout the New York Bight. A very large portion of the SCOQ fishery takes place within the NY bight. The clam companies are concerned that any transit lanes through a wind energy lease must reflect the historical routes taken by clam vessels. Safety is the main priority for all routing decisions.

The clam industry vessels that W&A represents feel it is appropriate that only the United States Coast Guard (USCG) perform the needed analysis and modeling that accurately reflects vessel movements. Vessel interactions are critical to determine routing measures that are appropriate for all marine traffic. USCG is the appropriate agency to evaluate the changes in navigational safety risk resulting from different routing scenarios. We believe that the USCG is the only entity with the expertise to perform these analyses, and, BOEM should request the USCG perform all modeling and analysis concerning vessels transiting through wind farms. The clam industry's position is that having the USCG perform the modeling and analysis is the only way to ensure that a proper analysis is done, while considering all marine users, with vessel safety as its primary objective. Although a consensus between fishermen and wind energy developers might be seen as beneficial, it falls well short of the analysis necessary to site transit lanes through Wind farms in the New York Bight and southern New England for all vessels.

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Thank you for considering the clam industry's comments.

If you have, any questions please feel free to contact me at any time.

Sincerely,



David H. Wallace

Cc

Brian Hooker (BOEM)

Edward G. LeBlanc (USCG)

Gregory Lampman (NYSERDA)

Clam Industry Members

Regional Office NMFS