

THE

**RESPONSIBLE
OFFSHORE
DEVELOPMENT
ALLIANCE**

Offshore Wind
Portfolio 2021



RESPONSIBLE OFFSHORE DEVELOPMENT ALLIANCE (RODA)

Responsible Offshore Development Alliance (RODA) is a broad membership-based coalition of fishing industry associations and fishing companies — across the United States — committed to improving the compatibility of new offshore development with their businesses. The alliance works to directly collaborate with relevant regulatory agencies (e.g., National Marine Fisheries Service, Bureau of Ocean Energy management, U.S. Coast Guard, fishery management councils, and state agencies), offshore developers, scientists, and others to coordinate science and policy approaches to managing development of the Outer Continental Shelf in a way that minimizes conflicts with existing traditional and historical fishing.

On March 25, 2019 RODA executed a ten-year Memorandum of Understanding with the National Marine Fisheries Service and Bureau of Ocean Energy Management to collaborate on the science and process of offshore wind energy development on the Atlantic Outer Continental Shelf. With our partners, RODA will work to ensure that local and regional fishing interests are involved early and often throughout offshore wind development processes, and that the interests and concerns of commercial fishermen are communicated as effectively as possible.

RODA works to increase collaborative research and monitoring in order to: (1) improve overall understanding regarding siting and operations of new offshore activities; (2) support mitigation requirements in terms of informing and minimizing impacts to users and resources, including development of standardized mitigation frameworks; and (3) inform agency decision-making and industry engagement through existing consultative processes.

RODA is working to design and implement new models for persistent, long-term, holistic, and collaborative research programs that effectively gather and communicate fishery-dependent and -independent data and expertise. It is approaching this through two channels: facilitating grassroots, fishing industry-driven efforts to enhance fishermen's ability to effectively bring their own expertise to the table, and—separately but relatedly—working in partnership with regulators and other ocean use proponents to ensure that fishermen are fully included in appropriate efforts to assess interactions between fisheries stocks and new ocean use and development.

To develop the best long-range solutions to offshore development, fishermen's knowledge must be directly included in study identification, prioritization, design, and execution of well-coordinated scientific research at the proper geographic scales.

At RODA, we know that subject-matter expertise is critical, and we want you to have everything you need to know in one spot. This portfolio includes an extensive overview of offshore wind development and its impacts particularly in the Mid-Atlantic and Southern New England regions.



TABLE OF CONTENTS

THIS PDF IS INTERACTIVE 



OFFSHORE WIND

The rapid advancement of large offshore wind energy facilities to meet climate goals places our nation at the dawn of a new era of ocean industrialization. While mitigating carbon emissions is urgent and necessary, so is protecting and prioritizing domestic sourcing of sustainable, affordable, and healthy protein. This necessitates evaluating the most efficient means of reducing atmospheric carbon while minimizing impacts to biodiversity and the economy.

Fishing communities stand ready and willing to incorporate their unique expertise in the country's transition to renewable energy but there must be meaningful ways for them to do so. Three key topics must be addressed to ensure responsible planning for the unprecedented demands that are anticipated to be placed on our Oceans.

- Improving regional research efforts and scientific understanding of offshore infrastructure projects
- Enhanced interstate coordination and clear delineation of authorities within federal agencies
- Facilitation of industry to industry cooperation

Currently, there is no balancing of priorities in offshore renewable energy permitting decisions. Promises to achieve production targets for offshore wind energy based solely on climate goals will significantly impact other public needs such as food production, tourism, and national security. Such targets, if adopted, must be accompanied by a comprehensive roadmap for evaluating tradeoffs and should not be pursued before the creation of balanced multi-use ocean plans.

ENVIRONMENTAL IMPACTS

A recent National Marine Fisheries Service (NMFS) meta-analysis showed only 11 peer-reviewed scientific studies in Europe examining the impacts of offshore wind energy facilities to fisheries and fish stocks. While RODA is collaborating on efforts to standardize and improve monitoring plans, there currently is almost no usable baseline data for evaluating impacts; this task is left to developers' discretion and not required over sufficient time scales. Facilities will prevent fisheries resource surveys and create management uncertainty, which will reduce legally allowable catch if not addressed. NMFS, fishery management councils, and fishing communities have not received augmented funding to support this critical work nor to conduct much-needed research.



PROCESS

Federal agencies oversee the permitting process, but most project decisions occur at the state level through power purchase agreements. In addition, state/federal and interstate conflicts have rendered Coastal Zone Management Act consistency reviews largely toothless. An example of this can be found with siting, which most often occurs in a black box based on wind speeds and driving competition amongst foreign wind developers or individual governors, not grid requirements or optimizing multiple ocean uses (the opposite is true for oil and gas). Offshore wind culture is process-oriented, not outcome-based. Commercial fisheries are federal and do not follow state lines but there is a lack of incentive for offshore wind advocates to address conflicts regionally. In light of this leadership vacuum, fishermen had to create their own group (RODA) to assume the role of coordination without designated authority or public funding.

NAVIGATION & SAFETY

Developers have ignored consistent, clear requests from fishermen to include corridors for safe vessel transit in their project designs. No state or federal regulator has required such lanes and the Coast Guard claims it has no authority to mandate them. Wind turbines will likely interfere with marine radar used on fishing boats. Unlike for the Cape Wind project, neither BOEM nor USCG has performed any study or analysis to determine the distance of the interference or ways to mitigate it, instead based on inappropriate data sets and incomplete information.

TRANSMISSION

Experience in Europe has shown that the vast network of cables associated with offshore wind energy result in as many impacts to fishing and the environment as the turbines themselves, if not more. Given the large scale of proposed offshore wind energy areas in U.S. waters, regulators and developers should have engaged in dedicated planning to coordinate transmission prior to identifying lease areas or designing projects. Instead, this critical issue that has enormous ramifications to fishing businesses, marine environments, power production, and pricing is being treated as an afterthought. No development should occur before a coordinated transmission system is designed and required, with extensive input from fishermen who best know seabed conditions. For an offshore grid system to be successful, it must: 1) be used effectively by offshore wind companies and not create more redundancies; and 2) be properly and comprehensively planned with substantial engagement with other ocean users, in particular fishermen, in order to avoid unnecessary conflicts with operations and important habitat areas.

JOBS

Offshore wind activities are not designed to comply with the Jones Act and proponents simply offer unenforceable promises that they will utilize U.S. materials, vessels, and crews at some undetermined point in the future. We must not lease millions of acres of our federal lands to foreign companies that are unwilling to invest in America. All projections of job creation and local investments originate from the wind industry itself and differ significantly with experience in Europe—a recent study showed only 6% of jobs promised in Norway actually materialized. Wind developers and trade associations have promised each state wild economic growth; in actuality, the U.S. can accommodate at most a few hubs and the numbers touted in each state are temporary and based on total, rotating installation crews. Power promises correspond to the nameplate capacity of turbines but in even the most efficient European projects they only generate roughly 40% of that (capacity factor). This rampant misinformation is used to make fishermen appear economically insignificant, when in reality a true economic comparison has never been completed.

Articles for Offshore Wind

July 2, 2020

Offshore wind: Seven things every fisheries professional needs to know

Guest Author: Annie Hawkins

By now, you have probably seen quite a bit about offshore wind energy development planned for multiple regions of the United States. Fishermen and related businesses understandably run the gamut from bewildered (“That would never happen where I fish”), to overwhelmed (“There’s too much else going on to pay attention”), to laser-focused (“Leases are on my fishing grounds”). Here are seven key reasons you should get involved now.

1. Wind is big

Just a few years ago, pilot or demonstration projects were the name of the game in U.S. offshore wind energy, but times have changed. Qualified companies are large and almost exclusively foreign-owned. Many or most are linked to governments and national oil and gas companies. They work closely with highly active trade associations, embassies, and investment firms.

The projects themselves are no less extraordinary. Current generation offshore wind turbines are three times the height of the Statue of Liberty, and the blades are among the largest composite human-made structures in existence. In the North Sea, Denmark even plans to build two artificial islands to house the large amount of offshore wind infrastructure there and export the power.

2. Conflicts are complex

There are so many aspects of interactions between offshore wind and fisheries that will be better understood the more the fishing industry brings its knowledge to the table. Offshore wind projects are not simply a series of “sticks in the water.”

In deeper waters of the Pacific, Hawaii and Gulf of Maine, floating platforms will be connected through a series of suspended cables. Inter-array cables run between turbines, and scour protection and mattresses extend far beyond the bases. The



RODA Workshop Brings Together Wind Energy Stakeholders for Science Workshop

December 3, 2020 -- In October, the Responsible Offshore Development Alliance (RODA) brought together fishermen, state and federal agency representatives, wind energy developers, and others to participate in a three-day workshop: *Synthesis of the Science: Fisheries and Offshore Wind Development*. The workshop kicked off the collaborative project, which provides a forum for research and knowledge sharing between the fishing industry, offshore wind industry, federal and state agencies, and the public.

RODA received funding from the National Marine Fisheries Service (NMFS) for the project, which consists of two integrated components, a virtual workshop and a published report. These components have the overarching purpose of enhancing regional and national understanding of existing science and data gaps related to offshore wind energy interactions with fish and fisheries.

Together, RODA, NMFS and the Bureau of Ocean Energy Management (BOEM) partnered on this project. Through a collaborative process co-designed by fishermen, wind developers, and state, academic, and federal partners, this effort advances the Responsible Offshore Science Alliance's (ROSA) regional science efforts by describing the current state of science, existing research and monitoring programs, and data gaps, and soliciting input regarding priority research questions.

Over 560 participants attended the virtual workshop from all around the world. Speakers from across the US, UK and Europe presented the state of play for the disciplines that had been identified by the planning team, including physical and benthic habitat, oceanography processes, biological and ecological interactions, socio-economics, impacts to fisheries monitoring and data collection, management and cumulative impacts. To gather expertise and input from participants, [breakout sessions](#) provided an opportunity for small group discussions on specific issue areas.

"With the speed in which offshore wind projects are moving and the depth of science that is required to safely operate within wind energy areas and to preserve our valuable ecosystems, the Synthesis of Science workshop will prove to be invaluable as we move forward," said Guy Simmons, Sea Watch International's Senior VP of marketing, product



NOAA, BOEM, and Fishing Industry Sign New Memorandum of Understanding

March 26, 2019 — *The following was released by NOAA Fisheries, the Bureau of Ocean Energy Management, and the Responsible Offshore Development Alliance:*

NOAA Fisheries, the Bureau of Ocean Energy Management (BOEM), and the [Responsible Offshore Development Alliance](#) (RODA) signed a 10-year [Memorandum of Understanding](#) that brings local and regional fishing interests together with federal regulators to collaborate on the science and process of offshore wind energy development on the Atlantic Outer Continental Shelf.

Safe, reliable, and affordable domestic energy production powers the U.S. economy, promotes jobs and is critical to our nation's security. Offshore wind is an abundant, domestic energy resource that is located close to major coastal load centers, providing an alternative to long-distance transmission or development of electricity generation in these land-constrained regions.

Fishing has occurred in New England and Mid-Atlantic waters for hundreds of years and is an integral part of the region's culture and economy. Regional fisheries not only provide a healthy and sustainable source of food for both domestic and international markets, but also recreational opportunities for thousands of anglers, divers, and nature enthusiasts. Fisheries also support numerous shoreside processing jobs and support industries important to the economies of many coastal communities.

“Any development on the Outer Continental Shelf must consider how these activities can affect current ocean users and the marine environment,” said BOEM Acting Director Walter Cruickshank. “That is why working with federal, state, and local agencies, fishing communities, and the public is such an essential part of our renewable energy program. We look forward to working with NOAA and RODA through early and constant communication to ensure that the most recent information is available to decision makers.”

“With wind energy developing in the New England/Mid-Atlantic region, this collaboration comes at a crucial time,” said Chris Oliver, assistant administrator for NOAA Fisheries, the primary federal agency charged with sustaining U.S. marine resources and habitats. “This Memorandum of Understanding will help achieve NOAA Fisheries’ strategic national goal of maximizing fishing opportunities while supporting responsible resource development.”

RODA, which is a broad membership-based coalition of fishing industry associations and fishing companies, will work with NOAA Fisheries and BOEM to compile, develop, and deliver the best available scientific products and information necessary to address offshore development, fisheries management, and ecosystem health.



RODA: Offshore Wind Report Indicates ‘Major Fundamental Flaws’ in Process

August 3, 2020 — *The following was released by the Responsible Offshore Development Alliance:*

The Bureau of Ocean Energy Management’s (BOEM) latest report on offshore wind “highlights the severity of impacts to fishing resources, businesses, and communities” and indicates “major fundamental flaws” in the offshore wind planning process, according to [new public comments](#) from the Responsible Offshore Development Alliance (RODA). Deficiencies in the report also reveal an unacceptable level of uncertainty and risk from a large-scale new ocean use.

RODA’s comments responded to BOEM’s supplement to the draft environmental impact statement (SEIS) for Vineyard Wind’s proposed 800-megawatt offshore wind project in federal waters off the coast of Massachusetts. In the SEIS, [BOEM found](#) that “major cumulative effects could occur on commercial fisheries” from East Coast offshore wind development in the coming years.

“We need to be thinking about the long-term impacts on our coastal communities and marine ecosystems, and right now there are too many red flags and unknowns,” said Annie Hawkins, RODA’s executive director. “Unfortunately this is the result of a collective failure to plan in a way that accommodates both fishing and renewable energy, and to invest in sound research and conflict resolution before the very latest stages of project review. The SEIS was a welcome step, but if it serves as the basis for greenlighting 2000 of the world’s largest turbines over 1400 square miles of unique ocean habitat, we’ll be embarking on one of the biggest socio-ecological experiments in history.”

Offshore wind planning has been fundamentally flawed, RODA wrote, and for fishermen, fisheries scientists, and managers “it is nothing short of chaotic.” While the SEIS partially evaluated fishing impacts, the most important decisions have already been made at the state- and project-level, making it difficult for BOEM to fairly weigh ocean uses, or ensure adequate ecological safeguards, on a geographically-appropriate scale. Fisheries experts have expressed for nearly a decade that the leasing process systematically ignores their environmental concerns until the final permitting phases. Without this important expertise, it is not surprising to see how much conflict and uncertainty remains, RODA wrote.

Transit lanes, the creation of a comprehensive mitigation plan, environmental impacts, and domestic job creation are among the other issues that still need to be resolved if offshore wind is to move forward, according to RODA’s comments.

Fishermen have long maintained that for most fisheries and gear types in the Vineyard Wind area, spacing turbines in a grid 1×1 nautical miles apart is too narrow to operate, making viable and safe transit lanes through the turbine arrays extremely important in the project design. RODA also questioned BOEM’s reliance on the Coast Guard’s Massachusetts and Rhode Island Port Access



Responsible Offshore Science Alliance forms to advance regional research on fisheries and offshore wind

April 8, 2019 — *The following was released by the Responsible Offshore Science Alliance:*

Today, the Responsible Offshore Science Alliance (ROSA) launches.

After many years of discussion and recognition of the need for a regional science body to address fisheries and wind development, ROSA has formed. It will provide for and advance regional research and monitoring of fisheries and offshore wind interactions in federal waters. It is a collaborative effort among fishing industry representatives, offshore wind developers, and state and federal government agencies.

ROSA's goals are to collect and disseminate salient and credible data on fisheries and wind development, and to increase the understanding of the effects and potential impacts of wind energy development on fisheries and the ocean ecosystems on which they depend. It will further seek to address broader aspects of the ocean environment that offshore fisheries and wind energy activities occupy, including pre-facility baseline activity and resource status, ecosystem-based fishery management, socioeconomic effects, cumulative impacts, and other relevant science. It will be structured with an Executive Council, Research Council, and topic-and geographic specific subcommittees comprised of scientific and technical experts of diverse affiliations.

The Responsible Offshore Development Alliance (RODA) was a key partner in forming ROSA, and will ensure continual, comprehensive fishing industry representation in ROSA's efforts.

"So much is poorly understood regarding the impacts of large-scale offshore wind energy development to fisheries and fish stocks, and studies that have been performed lack regional coordination," said Annie Hawkins, Executive Director of RODA. "This forum will be immensely helpful to the fishing industry so that it may provide leadership in study prioritization, methodology, and execution through cooperative research."

NOAA Fisheries supports the development of a regional science and monitoring framework through ROSA. As the federal agency charged with stewardship of living marine resources, including fisheries and associated fishing communities, NOAA also has an interest in the responsible planning, siting, and evaluation of offshore wind power activities. "America's offshore wind energy future is dependent on scientists, fishermen, and energy officials uniting under a common goal: safeguarding our invaluable marine resources," said Chris Oliver, Assistant Administrator for NOAA Fisheries. "NOAA Fisheries is pleased to be a part of this scientific endeavor to ensure our fisheries and fishing communities continue to thrive."

Several developers including EDF Renewables, Ørsted, Shell New Energies, and Equinor Wind US have expressed support for ROSA.



RODA Suggests Improvements for Federal Consideration of Fishing Impacts from Proposed Vineyard Wind Project

February 22, 2019 – WASHINGTON – *The following was released by the Responsible Offshore Development Alliance:*

Today, the Responsible Offshore Development Alliance (RODA) submitted comments to the Bureau of Ocean Energy Management on the Draft Environmental Impact Statement and associated Construction and Operations Plan for Vineyard Wind’s proposed wind energy facility off New England.

RODA noted the improved depth of fisheries analysis in the report compared to previous documents, but highlighted several concerns regarding the leasing process and suggested a wide range of topics for which information regarding fisheries impacts is inaccurate or requires further analysis. The comments are primarily intended to serve as guidance for improving fisheries-related consideration and analysis for this and future projects.

RODA is a membership-based coalition of fishing industry associations and fishing companies dedicated to improving the compatibility of new offshore developments with their businesses. RODA membership includes major fishing associations, dealers, and affiliated businesses, in addition to over 120 vessels across nine states operating in approximately 30 fisheries. RODA’s comments on Vineyard Wind are the result of extensive and direct input from a large number of industry members.

[Read RODA’s public comments here](#)



RODA and Ørsted Partner to Address Fisheries and Offshore Wind Coexistence

January 17, 2019 — BOSTON — *The following was released by the Responsible Offshore Development Alliance and Ørsted:*

The Responsible Offshore Development Alliance (RODA) today announced that it has entered into a partnership agreement with Ørsted U.S. Offshore Wind to improve communications between the commercial fishing industry and offshore wind energy developers.

This first-of-its-kind partnership will create an unprecedented opportunity for commercial fishermen to provide direct input to the wind energy industry on matters of significant interest to their businesses. Under this partnership, both industries will remain autonomous but provide a platform to move towards workable solutions. While non-binding in nature, it is RODA and Ørsted's hope that discussions will prove beneficial to all parties involved.

"Partnering with Ørsted is a significant step forward as we look to strengthen our ongoing dialogue between commercial fishermen and offshore wind developers," said RODA Executive Director Annie Hawkins. "RODA believes that we need to develop solutions for offshore wind energy and commercial fishing to coexist, and today's announcement will support future sustainability for both industries."

"We are proud to be the first offshore wind developer to partner with RODA, which is an important part to the future of offshore wind," said CEO of Ørsted U.S. Offshore Wind and President of Ørsted North America Thomas Brostrøm. "The fishing community must be considered as offshore wind development continues in the U.S. Through this partnership, we will be able to share our concerns in a productive way and develop practical solutions as we all seek to coexist and thrive for a better tomorrow."

RODA is the only national commercial fishing organization that is purpose-built for interacting with the offshore wind industry to maintain sustainable fisheries. Based from Midcoast Maine to the Outer Banks of North Carolina, it also has the broadest geographic and gear-type range of any East Coast fishing industry membership organization active in offshore wind engagement.

The RODA Board of Directors consists of fishing industry representatives who bring over 200 years of combined operational and management experience, split across the range of federally and state-managed Atlantic fisheries. One of RODA's primary goals is to ensure that the fishing industry's input at-large is received, considered, and accommodated to the maximum extent possible in leasing, design, construction, and operations of new offshore developments.



Working Group Nears Consensus on Transit Lane for Fishing Vessels in Northeast Wind Energy Areas

December 6, 2018 — *The following was released by the Responsible Offshore Development Alliance:*

The [Responsible Offshore Development Alliance](#) (RODA), which consists of regional fishing industry representatives from Maine to North Carolina, convened an Offshore Wind Transit Lane Working Group meeting on December 3rd at the Hotel Viking in Newport, R.I.

Fishing industry representatives, offshore wind developer lease-holders, the National Marine Fisheries Service (NMFS), the Bureau of Ocean Energy Management (BOEM), and the U.S. Coast Guard, among others, joined RODA to continue an attempt to develop fishery transit lanes through the large group of Wind Energy Areas (WEAs) in federal waters off of Massachusetts and Rhode Island. The meeting was facilitated by the Consensus Building Institute. Currently, three WEAs are subject to active leases held by Ørsted U.S. Offshore Wind and Vineyard Wind. BOEM will hold an additional auction for three new leases in WEAs adjacent to the existing sites on December 13, 2018.

In addition to loss of access within the lease areas, commercial fishermen coastwide have long been concerned about their ability to safely travel across wind energy arrays to access other historical, traditional commercial fishing grounds. They are especially concerned with the size of the WEAs being proposed by BOEM, which are by far the largest in the world.

While fishing industry representatives and wind developers agree that minimizing transit time through wind energy arrays is a primary design goal, safety risks greatly increase due to the long distances—up to 50-70 miles—fishing boats may be required to transit either around or through wind energy arrays.

The Massachusetts Fisheries Working Group on Offshore Wind began to consider the development of transit lanes earlier this year, and RODA has since held a large workshop followed by the smaller working group meeting to continue this task. To prepare for the working group meeting, RODA asked NMFS and the Northeast Regional Ocean Council Data Portal team to evaluate historic transit patterns to identify options for safe and direct access to fishing grounds. NMFS presented an analysis based on VMS and AIS data that substantially supported input received from the fishing industry regarding prevailing transit patterns.

As some examples, vessels from Massachusetts, Rhode Island, Connecticut, and other ports frequently cross the Wind Energy Areas in a “diagonal” Northwest-Southeast direction to access offshore fishing grounds, and will no longer have access to direct routes. Vessels from New York

Articles for Environmental Impacts

November 17, 2020

Making Waves: Offshore Wind and Commercial Fishing

By **Kirk Moore**

Join NF editors Kirk Moore and Jessica Hathaway for a discussion on the future of offshore wind power with panelists Annie Hawkins, executive director of the Responsible Offshore Development Alliance in Washington, D.C.; Mike Conroy, executive director of the Pacific Coast Federation of Fishermen's Associations in San Francisco; and Bonnie Brady, executive director of the Long Island Commercial Fishing Association; Montauk, N.Y.

Ask questions for the panel in our Member Forum — details below the [video](#).

We will be talking about the latest developments with proposed wind energy projects off the East Coast — and how soon those proposals will come to the West Coast. Topics include the upcoming federal environmental impact statement on the cumulative impacts of Vineyard Wind and other East Coast projects; the status of wind energy planning off the West Coast; the state of relations and communications between fishermen and the wind industry; and fishermen's concerns with safety and adequate vessel traffic lanes between turbines.

Bonnie Brady: "It's really important for fishermen to lock arms and work together before they get run over by these things on their historic fishing grounds."

Wind energy regulators and the Coast Guard need better data on fishing vessel traffic, says Annie Hawkins: "It should not have come to the level of disagreement that it did with that New England area... with saying 'Be more vigilant, drink more coffee.' That's not where we should be."

Mike Conroy: West Coast floating turbines "adds a level of complexity" with deepwater mooring cables. For some fisheries, "it's going to be operationally impossible for them to function."

- Sign up for a free [NationalFisherman.com](https://www.nationalfisherman.com) membership.

The Fisheries and Offshore Wind Energy: Synthesis of the Science project consists of two integrated components, a virtual workshop and a published report, which together have the overarching purpose of enhancing regional and national understanding of existing science and data gaps related to offshore wind energy interactions with fish and fisheries.

This joint effort brings together the National Oceanic and Atmospheric Administration (NOAA) Fisheries, the Bureau of Ocean Energy Management (BOEM), and the Responsible Offshore Development Alliance (RODA).

Through a collaborative process co-designed by fishermen, wind developers, and state, academic, and federal partners, this effort will advance the Responsible Offshore Science Alliance's (ROSA) regional science efforts, by describing the current state of science, existing research and monitoring programs, and data gaps and soliciting input regarding priority research questions.

WORKSHOP PLENARY PRESENTATIONS – OCTOBER 2020

INTRODUCTION:

- Welcome Keynotes
- Speakers:
 - Chris Oliver, NOAA Fisheries
 - Walter Cruickshank, BOEM

ECOSYSTEM EFFECTS:

- Keynote: Offshore Wind Energy and Ecosystem Effects
- Speakers: Andrew Gill, Centre for Environment, Fisheries and Aquaculture Science

BENTHIC HABITAT MODIFICATIONS:

- Moderator: Brian Hooker, BOEM
- Panelists:



Responsible Offshore Development Alliance

February 22, 2019

Dr. Walter Cruickshank, Acting Director
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, Virginia 20166

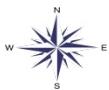
Re: Notice of Availability of a Draft Environmental Impact Statement for Vineyard Wind LLC's Proposed Wind Energy Facility Offshore Massachusetts [Docket No. BOEM-2018-0069]

Dear Dr. Cruickshank,

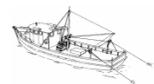
The Responsible Offshore Development Alliance (RODA) submits the following comments regarding the Draft Environmental Impact Statement (DEIS) and associated Construction and Operations Plan (COP) submitted by Vineyard Wind, LLC for its proposed wind energy facility in federal waters off of New England.¹ 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.

We value the productive relationship RODA has had with the Bureau of Ocean Energy Management (BOEM) since our inception and the opportunity to engage in open communication on the impacts of offshore development to commercial fisheries. RODA thanks BOEM and its subject matter experts for the significant amount of work that went into the preparation of this DEIS, and notes the improved depth of its fisheries analysis in comparison to previous environmental review documents that we have reviewed. We look forward to working with you as you refine the DEIS prior to completion of any final Environmental Impact Statement and consequential decisions.

¹ 83 Fed. Reg. 63184 (Dec. 3, 2018).



Navigating Together into the Future



Executive Director: Anne Hawkins

Chairman: Peter Hughes

Treasurer: Eric Reid

For Information, Contact Annie@RodaFisheries.org

Review of “Vineyard Wind 1 Offshore Wind Energy Project Supplement to the Draft Environmental Impact Statement”

Eric N. Powell, Editor, Director, Science Center for Marine Fisheries, University of Southern Mississippi
Andrew Scheld, Fisheries Economist, Virginia Institute of Marine Science
Pat Sullivan, Professor, Cornell University
Josh Kohut, Professor, Rutgers University
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Daphne Munroe, Associate Professor, Rutgers University
Paula Moreno, Principal Scientist, EcoMarine Integrated Analytics, LLC
Gavin Fay, Associate Professor, University of Massachusetts Dartmouth

Date of Final Draft: July 22, 2020

Editor’s Note¹

This document addresses primarily perceived weaknesses in the SEIS. The editor emphasizes that many issues have been dealt with satisfactorily and these are not addressed, in the main, herein in order to limit document length.

Table 1 prepared by Munroe and Kohut, summarizes the types/scale of wind farms that are reported in the literature. This table points out that the size and scale of what is being considered in the SEIS has not been studied to date and thus the existing literature under consideration in the SEIS may not adequately represent the situation in the US. This constraint limits evaluation of impact across most subject areas.

General Comments:

The SEIS describes a variety of potential impacts on biological, physical, socioeconomic, and cultural resources resulting from proposed development alternatives of the Vineyard Wind 1 project. Resource impacts resulting from wind energy development more broadly throughout the U.S. Atlantic, from North Carolina to Maine, are also included. Impacts are identified as adverse or beneficial and ranked as negligible, minor, moderate, or major. The analysis is extensive across potentially affected resources, though limited in detail for specific resources and impact-producing factors. This lack of detail is often a weakness when examined relative to the potential impacts discussed. Description of expected impacts often identifies a broad range of levels, such that it is difficult to discern anticipated effects with any degree of certainty, for example. As a case in point, in section 3.11, the SEIS states that “cumulative impacts from the presence of structures associated with the Proposed Action when combined with past, present, and reasonably foreseeable activities on commercial fisheries and for-hire recreational fishing are anticipated to range from negligible to major” (section 3.11.2.1, pg. 127 / 3-100).

Key Issue 1: Evaluation of the Totality of impact across the Mid-Atlantic region

Section 1.2.1.1 Reasonably Foreseeable Assumptions quoted here presents an example of the limitations of the SEIS “It is difficult to predict turbine capacity and spacing or other future engineering for planned but currently unscheduled offshore wind awards. For those projects with announced WTG sizes, BOEM assumed an 8 or 12

¹This report was funded by SCMFIS (Science Center for Marine Fisheries) under National Science Foundation grant #1841112. The scientific results and conclusions of this SCMFIS project, as well as any views or opinions expressed herein, are those of the authors and do not necessarily reflect those of SCMFIS Industry Advisory Board Member companies, VIMS, USM, NOAA, or the Department of Commerce.

Articles for Process

November 16, 2020

Expo News: Static electricity

By Kirk Moore

The fledgling U.S. offshore wind industry is gathering critical mass in southern New England, where a forthcoming environmental assessment of the 800-megawatt Vineyard Wind plan could determine how it and a dozen other East Coast projects might proceed.

Fishermen in the Northeast fleets, heirs to a 400-year New England industry, are deeply engaged on scientific, political and legal fronts, trying to slow what they see as federal and state governments overenthusiastic about granting wind developers chunks of the outer continental shelf.

In June 2018, East Coast fishing industry leaders organized the Responsible Offshore Development Alliance to represent fishermen's interests to the wind industry and government regulators. Annie Hawkins, RODA's executive director, says fishermen on every coast need to get involved.

"Just because the current projects are not located in your area doesn't mean they won't affect you," Hawkins wrote in a July 2 commentary in *NF*. "A relatively small group of developers own the leases, and the federal permitting process is being tested and tweaked in real time.

"Even states are following closely in the footsteps of others, as was recently seen when Massachusetts largely followed a Rhode Island-developed process for compensatory mitigation for the Vineyard Wind project. The developer stated its intent for that process to set precedent for every project in every state," says Hawkins.

In early 2020, West Coast fishermen joined with RODA to set up a Pacific advisory council. It has attracted membership from every fishery in the region, with fishermen recognizing how the political climate in California, Seattle and Washington favors developing renewable energy sources. Alongside decades-long policies to preserve its coast and ocean environment, California has more recently committed to seeking 100 percent renewable power sources.



Responsible Offshore Development Alliance Calls for Changes to 'Broken and Ineffective' Wind Development Outreach

June 3, 2020 — *The following was released by the Responsible Offshore Development Alliance:*

The Responsible Offshore Development Alliance (RODA) is calling on state and federal regulators to extensively revise their approach to planning offshore wind development off of Oregon, calling the current system “broken and ineffective” for preserving sustainable seafood production. The comments come in a [public comment letter](#) submitted by RODA on the engagement plan for the Bureau of Ocean Energy Management’s (BOEM) Oregon Intergovernmental Renewable Energy Task Force.

In the letter, RODA calls for BOEM to develop a new planning and engagement model that brings fisheries stakeholders into the process early, with greater participation from fisheries members on task forces and greater opportunities for public input.

Task forces need to work with the industry identify potential impacts on fishing before any offshore leases are issued. Often input from the fishing industry is sought too late in the process, after leases have been awarded and sites selected.

“Fisheries participants and experts must be wholly integrated into every step of the planning process through true collaboration,” the letter states.

Collaboration with the fishing industry is vital because of the many documented conflicts between fishing and wind energy development. These include potential environmental impacts on marine species and habitats; limiting fishing access; disruptions of scientific surveys; and interactions with protected species such as whales.

RODA is a membership-based coalition of fishing-related companies and associations committed to improving the compatibility of new offshore development with their businesses. RODA’s approximately 170 members represent every Atlantic coastal state from North Carolina to Maine, and Pacific coast members in California, Oregon and Washington.

[Read the letter here](#)

FISHERMEN DEMAND A SAY IN DECISIONS ON OFFSHORE WIND ENERGY

Wayne Parry, The Associated Press

September 16, 2019 — Fishermen insisted Monday to a congressional subcommittee looking at offshore wind energy that they be consulted when crucial decisions are being made on the development of such projects, including where they are located and the level of access to the waters near them.

Fishermen should have been brought into the planning process from the start, Peter Hughes, of Atlantic Capes Fisheries, told U.S. House members from New Jersey and California who were holding a hearing at the Jersey Shore.

“Look at these slides,” he said, referring to diagrams of where proposed wind projects would be built. “They’re right smack dab where we are fishing. This is going to put people out of business.”

The purpose of the hearing was to gather input from the fishing industry and its advocates to be considered in future regulation of the nascent wind energy market. So far, a single five-turbine wind farm off Block Island, Rhode Island, is the only operating offshore wind farm in the U.S., but states up and down the East Coast are readying plans for similar projects.

Capt. Ed Yates, a fisherman from Barnegat Light, New Jersey, said flounder, cod and other species have moved away from underground cables at a wind project off Denmark.

“How does offshore wind energy affect the fishing industry?” he asked. “The answer we get from the wind operators is ‘We won’t fully understand the impacts until the facilities are already built.’”

The Responsible Offshore Development Alliance formed last year to represent the interests of the fishing industry regarding offshore wind. The group’s executive director, Annie Hawkins, said more scientific studies are needed, adding there has been virtually no public discussion of important questions like how wind energy projects would be dismantled after reaching the end of their lifespans.



Equinor Steps Up to Enhance Dialogue with Fisheries

February 27, 2019 — WASHINGTON — *The following was released by the Responsible Offshore Development Alliance:*

In an increased effort to promote the coexistence and collaboration between offshore wind development and the U.S. fishing industry, the Responsible Offshore Development Alliance (RODA) would like to announce that Equinor Wind US has joined its Joint Industry Task Force. The purpose of the task force is to develop recommendations for maximizing the compatibility of offshore wind development with the established fishing industry in the region.

The Joint Industry Task Force allows both industries to remain autonomous while facilitating conversations, utilizing the best available science, and providing a space for direct input to be discussed and generating novel solutions, as offshore development continues to move forward. In particular, the task force will focus on improving communications regarding operational and design elements of offshore wind energy development projects and commercial fishing practices.

This innovative partnership was created earlier this year. In order to ensure a productive and collaborative discussion, the vision of a complete joint industry task force will have fully inclusive representation from the region's diverse fisheries and offshore wind energy developers. RODA invites any interested wind energy developers and commercial fishermen, or fishing industry businesses, to join in this endeavor.

March 28, 2019

Wind win: Fisheries alliance signs pact with NMFS and BOEM

Guest Author: Jessica Hathaway

The Responsible Offshore Development Alliance has signed a 10-year collaborative agreement with NMFS and the Bureau of Ocean Energy Management regarding the development of offshore wind energy projects off the East Coast.

The Washington-based alliance represents the seafood and fishing industries and has been working to voice and amplify the concerns of the maritime trades as offshore wind projects are being fast-tracked for approval.

"The fishing industry has expressed its concern about the potential impacts of rapid, large-scale wind energy development to coastal communities and sustainable fishing practices," said Annie Hawkins, executive director of the alliance. "This agreement paves a way forward for fishing communities to give meaningful input to federal regulators in determining the future of our ocean resources."

The agreement states that the federal agencies will seek to engage local and regional fishing communities in areas where offshore wind projects are being considered and work together to ensure decisions are made using the best available science. They will also determine how to incorporate industry knowledge into the offshore wind development process.

"Of course, any development on the Outer Continental Shelf must consider how these activities can affect current ocean users and the marine environment," said BOEM's Acting Director Walter Cruickshank. "That is why working with federal, state and local agencies, fishing communities, and the public in our process is such an essential part of our renewable energy program. We look forward to working with NOAA and RODA to balance the needs of all ocean users through extensive and continuous engagement."

So far, the federal government has leased 1.7 million acres in the Atlantic for 15 wind energy development projects. Those projects intersect with the fishing and transit grounds of more than 4,600 fishing vessels. Those boats landed more than a billion pounds of fish in 2016 and are responsible for producing 140,000 jobs.

SEAFOOD INDUSTRY GROUP SIGNS PACT WITH NOAA FISHERIES, BOEM OVER WIND ENERGY PROJECTS

Steve Bittenbender, Seafood Source

March 27, 2019 — A U.S. organization representing the seafood industry announced on Tuesday, 26 March, that it reached a 10-year agreement with two key federal agencies regarding the development process for offshore wind energy projects in the Atlantic Ocean.

Under the terms of the memorandum of understanding signed by NOAA Fisheries, the Bureau of Ocean Energy Management, and the Responsible Offshore Development Alliance, they will seek to engage local and regional fishing communities in areas where offshore wind projects are being considered. They will also determine how to deliver industry knowledge into the offshore wind development process.

In addition, they will work together to ensure decisions are made using the best available science.

“Of course, any development on the Outer Continental Shelf must consider how these activities can affect current ocean users and the marine environment,” BOEM Acting Director Walter Cruickshank said in a statement. “That is why working with federal, state, and local agencies, fishing communities, and the public in our process is such an essential part of our renewable energy program. We look forward to working with NOAA and RODA to balance the needs of all ocean users through extensive and continuous engagement.”

Currently, the U.S. has leased 1.7 million acres offshore in the Atlantic for wind energy development. Once all are active, those 15 projects could develop enough electricity for 6.5 million homes.

[Read the full story at Seafood Source](#)

FEDERAL REGULATORS, FISHERMEN AGREE TO CONSULT ON OFFSHORE WIND

Kirk Moore, WorkBoat

March 27, 2019 — Federal energy and ocean officials signed a formal agreement with commercial fishing advocates to work together on planning for offshore wind energy development.

It is a milestone for the East Coast fishing industry, which is pressing hard to have more influence over how the federal Bureau of Ocean Energy Management is overseeing private wind power developers.

The 10-year memorandum of understanding between BOEM, the National Oceanic and Atmospheric Administration, and the Responsible Offshore Development Alliance aims to bring “local and regional fishing interests together with federal regulators to collaborate on the science and process of offshore wind energy development on the Atlantic Outer Continental Shelf,” according to a joint statement released Tuesday.

BOEM officials stressed domestic energy production is critical to the nation’s economy and security and that potential offshore wind energy is “located close to major coastal load centers, providing an alternative to long-distance transmission or development of electricity generation in these land-constrained regions.”

The statement also recognizes the fishing industry’s centuries-old place in the region’s economy and culture, and fisheries’ ongoing economic role in the seafood and recreational industries.

“Any development on the Outer Continental Shelf must consider how these activities can affect current ocean users and the marine environment,” said BOEM Acting Director Walter Cruickshank. “That is why working with federal, state, and local agencies, fishing communities, and the public is such an essential part of our renewable energy program. We look forward to working with NOAA and RODA through early and constant communication to ensure that the most recent information is available to decision makers.”

[Read the full story at WorkBoat](#)

Governor Janet T. Mills
1 State House Station
Augusta, ME 04333

January 7th, 2021

Dear Governor Mills,

Maine's fishing community maintains serious concerns about current offshore wind energy (OSW) efforts envisioned for the Gulf of Maine (GOM). To begin constructive dialogue, the fishing community supports the creation of an inclusive planning process and research program over the rapid implementation of commercial-scale OSW facilities. The industry strongly urges you to prioritize a thorough review of Maine's OSW statutes and regulations as a more measured first step to ensure the state has the tools in place to minimize potential harms and maximize the benefits of OSW to the people of Maine.

On April 14th, 2020, approximately 50 GOM fishing industry and community leaders submitted a letter to you, Governor Sununu, and Governor Baker regarding GOM OSW development, and we appreciate your April 29th response. Since the time of that correspondence, the State of Maine announced its plan to pursue a floating OSW "research array" and held four informational webinars about the project from December 15-22, 2020. Maine's fishing community members raised many questions during the informational meetings and unfortunately, received too few answers.

We are troubled that the timeline for the state's proposed research array allows for neither adequate planning nor engagement with the fishing community. We ask you to consider adjusting your approach to ensure the timeline and research plans will support meaningful fishing community collaboration. We are willing to work, in good faith, with the state on the research array to consider outcomes that may minimize impacts to fishing practices and provide much-needed socioeconomic and environmental data. However, this is only possible if we have a reasonable timeline and planning process to complete this work.

In December, the Department of the Interior (DOI) clarified its policy prioritizing the requirement to minimize OSW impacts to fishing operations through a legal memorandum. The memo states that "[n]owhere does the statute indicate that the Secretary is only to prevent interference with the *legal* right to navigate or fish in an area. It is the Secretary's job to provide for the prevention of interference with those *uses*" (emphases added). In practice, this means that OSW projects cannot be approved unless they do not unreasonably interfere with fishing activity. As pointed out during all four informational webinars, given the significant fishing occurring in the GOM, and the relative lack of fine-scale spatial data, the risk of unreasonable interference would greatly increase if a project is rushed and does not include close coordination with fishing experts.

MAINEBIZ: FISHERMEN SAY MILLS' OFFSHORE WIND PLAN IS SHORT-CIRCUITING INPUT PROCESS

January 14, 2021 — A coalition of fishing communities last week sent a letter to Gov. Janet Mills expressing concern about proposed offshore wind energy development in the Gulf of Maine.

The coalition, called Responsible Offshore Development Alliance and based in Washington, D.C., asked the Mills administration to prioritize “an inclusive planning process and research program over the rapid implementation of commercial-scale OSW [offshore wind] facilities.”

The Maine Lobstermen’s Association, Maine Coast Fishermen’s Association, and a number of Maine-based fishermen are members of the alliance. The Governor’s Energy Office is leading the development of a [research array](#) of up to 12 turbines covering up to 16 square miles somewhere along the southern half of Maine’s coast. The location and size and number of the turbines haven’t been determined yet.

In a virtual information meeting last month, GEO Deputy Director Celina Cunningham said the state is seeking input from fishermen to determine locations that would have minimal conflict with known fishing grounds. But Responsible Offshore Development Alliance Executive Director Annie Hawkins wrote the group is “troubled that the timeline for the state’s proposed research array allows for neither adequate planning nor engagement with the fishing industry.”

She added that the fishing industry is willing to work with the state on the research array “to consider outcomes that may minimize impacts to fishing practices and provide much-needed socioeconomic and environmental data. However, this is only possible if we have a reasonable timeline and planning process to complete this work.”

RODA request pause in offshore wind development amid COVID-19 pandemic

By Chris Chase
April 15, 2020

The Responsible Offshore Development Alliance – a lobbying group [formed in January 2018](#) to represent the East Coast fishing industry in discussions over offshore wind energy development – has called for all a six-month pause in the regulatory process pertaining to offshore wind development in the Gulf of Maine due to the impacts of the COVID-19 pandemic.

The call for a delay came via a letter sent to governors of New England states, including Charlie Baker of Massachusetts, Janet Mills of Maine, and Chris Sununu of New Hampshire. The letter was also sent to Walter Cruickshank, the acting director of the Bureau of Ocean Energy Management. The letter sites the importance of public participation in regulatory decisions, which is hampered by measures many states are taking to prevent transmission of COVID-19.

“Due to COVID-19, many meetings and opportunities for this engagement have been postponed until further notice,” RODA Executive Director Annie Hawkins wrote in the letter.

RODA, and the commercial fishing industry in the Northeast U.S., [have objected](#) to the layout of wind projects in the region, with the industry offering compromises such as [transit lanes](#) to minimize the impact on the seafood industry.

In the letter, RODA points out that the industry is facing financial impacts from the pandemic, which has forced members to put time and effort into addressing the crisis, and not engagement in offshore wind development.

“A six-month pause would not only demonstrate good faith to the fishing industry, but also allow for additional research on offshore wind’s impact on marine ecosystems and better data sharing that will benefit offshore development moving forward,” RODA said in a press release.

The letter additionally calls for three more steps, including the formation of a fisheries-driven Gulf of Maine regional working group, that can participate in the process.

“Fishermen in Maine, New Hampshire, and Massachusetts all fish in the Gulf of Maine, and are currently forced to follow every meeting and engagement opportunity in each state to fully understand how offshore wind would affect their livelihoods,” the release states. “A regional group, convened and led by the fishing industry, would more efficiently address industry concerns and allow for industry input, according to the letter.”

Articles for Navigation and Safety

Responsible Offshore Development Alliance proposes transit lanes for New England offshore wind

By Chris Chase

January 7, 2020

The Responsible Offshore Development Alliance (RODA) has submitted a letter to NOAA Fisheries, the U.S. Coast Guard, and the Bureau of Ocean Energy Management (BOEM) that proposes a new layout for potential wind projects off the coast of New England.

The proposal includes several four-nautical-mile transit corridors that follow likely paths for fishermen in the region. Groups representing the fisheries in the region [have objected repeatedly](#) to multiple New England wind energy projects, including the [Vineyard Wind](#) project, citing concerns about the potential impact to their ability to fish effectively in the areas where the wind projects are installed.

RODA, and other groups representing fisheries in the area, have objected to a lack of direct input in the current proposed spacing of wind turbines in the area, which would be in a grid with spacing of one nautical mile between each turbine.

“On 1 November, 2019, the five New England leaseholding developers submitted a proposal for a uniform [one square nautical mile] wind turbine layout for the New England offshore wind energy areas,” RODA wrote in its letter submitting the new proposal. “Neither RODA nor our members had direct input into that proposal, and it does not represent the needs and requests that fishing industry participants have clearly and consistently documented through public meetings and on the record.”

RODA is requesting that the USCG analyze their new proposal, “at a minimum giving it equal consideration to that presented by the developers.”

“This proposal enhances safety for mariners, and closely follows expected and reasonable design and process principles recommended by fishing industry experts,” RODA wrote. “Neither of these proposals should supplant any of the ongoing work for the USCG MARIPARS study, and each of them should be analyzed under the process for MARIPARS including full consideration of all factors that impact navigational safety.”

New England fishing groups object to latest offshore wind layout proposal

By Chris Chase

November 19, 2019

Groups representing New England fisheries are objecting to a recently released proposal regarding the future spacing of offshore wind turbines.

Five companies that hold leases for offshore wind projects in New England – Equinor, Mayflower Wind, Ørsted/Eversource, and Vineyard Wind – released a joint statement calling for a uniform layout of the wind turbines. The companies are calling for a 1 nautical mile spacing, arranged in east-west rows and north-south columns.

“In response to feedback from key stakeholders, we have proposed to adopt a uniform turbine layout across our adjacent New England lease areas,” the companies said in the joint statement. “This uniform layout has subsequently been proposed to the United States Coast Guard (USCG) for its review.”

The spacing, according to the statement, is “consistent with the requests of the region’s fisheries industry and other maritime users.”

A report put together by the industry indicates that the traffic is generally “transiting around, or along the outside edges, of the wind energy area” and that vessels “up to 400 feet in length can safely operate within the proposed 1x1 nautical mile layout.”

However, two groups representing the interests of fisheries in the region – the Responsible Offshore Development Alliance (RODA) and the Fisheries Survival Fund – both issued statements of their own objecting to the one nautical mile spacing, and the findings of the wind industry’s report.

“It is unclear what industry requests these developers are responding to, but this proposal does not reflect the position of the scallop industry,” the Fisheries Survival Fund wrote in a statement. “It is also unclear how this unsupported proposal, delivered to the Coast Guard for the stated purpose of addressing other maritime interests, will benefit commercial fisheries or promote fishing vessel navigational safety.”

RODA calls for revisions to port access study used in offshore wind project impact statements

By Chris Chase

July 7, 2020

The Responsible Offshore Development Alliance (RODA), an organization representing fishing industry interests related to proposed offshore wind projects in New England, has officially requested that the U.S. Coast Guard correct a study done relating to port access in parts of the region.

The study, the Massachusetts and Rhode Island Port Access Route Study (MARIPARS), does not fully take into account the full depth of fishing industry use in the region, according to a letter sent by RODA to the U.S. Coast Guard. RODA claims the report, issued on 27 May, 2020, does not take into account certain information, resulting in “fundamental omissions and calculation errors that compromise the quality, objectivity, and integrity of the information contained therein.”

The port access study has been a key source of information for decision-making on multiple offshore wind projects off the coast of New England – projects that fishermen have either [been worried about](#) or [objected to](#) in light of potential impacts to the industry in the region. RODA previously offered a series of proposals and input to the [MARIPARS study process](#).

Now, the organization is requesting the Coast Guard take a second look at what it calls five “key errors” in the study, which include “inappropriate selection of fisheries data sources,” “complete absence of analysis of fishing vessel operational requirements,” “unjustified analysis of only one layout design rather than a range,” “inclusion of clear mathematical errors,” and “false assertions regarding radar interference.”

Inappropriate selection of fisheries data sources, according to RODA, is related to the Coast Guard’s use of Automatic Identification System technology as an indication of vessel activity and movement. However, RODA states that AIS isn’t used on the majority of affected vessels in the so-called wind energy areas [WEAs].

“Prior to initiation of the MARIPARS study, and throughout its development, multiple fisheries groups including RODA informed the USCG that the majority of fishing vessels in the [Massachusetts and Rhode Island] WEAs are not using [AIS] technology, and therefore it should not be used as a primary data source for evaluating vessel behavior,” the formal request states.



Working Group Near Consensus on Transit Lanes for Fishing Vessels in Northeast Wind Energy Areas

December 6, 2018 — *The following was released by the Responsible Offshore Development Alliance:*

The [Responsible Offshore Development Alliance](#) (RODA), which consists of regional fishing industry representatives from Maine to North Carolina, convened an Offshore Wind Transit Lane Working Group meeting on December 3rd at the Hotel Viking in Newport, R.I.

Fishing industry representatives, offshore wind developer lease-holders, the National Marine Fisheries Service (NMFS), the Bureau of Ocean Energy Management (BOEM), and the U.S. Coast Guard, among others, joined RODA to continue an attempt to develop fishery transit lanes through the large group of Wind Energy Areas (WEAs) in federal waters off of Massachusetts and Rhode Island. The meeting was facilitated by the Consensus Building Institute. Currently, three WEAs are subject to active leases held by Ørsted U.S. Offshore Wind and Vineyard Wind. BOEM will hold an additional auction for three new leases in WEAs adjacent to the existing sites on December 13, 2018.

In addition to loss of access within the lease areas, commercial fishermen coastwide have long been concerned about their ability to safely travel across wind energy arrays to access other historical, traditional commercial fishing grounds. They are especially concerned with the size of the WEAs being proposed by BOEM, which are by far the largest in the world.

While fishing industry representatives and wind developers agree that minimizing transit time through wind energy arrays is a primary design goal, safety risks greatly increase due to the long distances—up to 50-70 miles—fishing boats may be required to transit either around or through wind energy arrays.

The Massachusetts Fisheries Working Group on Offshore Wind began to consider the development of transit lanes earlier this year, and RODA has since held a large workshop followed by the smaller working group meeting to continue this task. To prepare for the working group meeting, RODA asked NMFS and the Northeast Regional Ocean Council Data Portal team to evaluate historic transit patterns to identify options for safe and direct access to fishing grounds. NMFS presented an analysis based on VMS and AIS data that substantially supported input received from the fishing industry regarding prevailing transit patterns.

As some examples, vessels from Massachusetts, Rhode Island, Connecticut, and other ports frequently cross the Wind Energy Areas in a “diagonal” Northwest-Southeast direction to access offshore fishing grounds, and will no longer have access to direct routes. Vessels from New York

CREATING TRANSIT LANES FOR FISHING VESSELS IN NORTHEAST WIND ENERGY AREAS STILL A WORK IN PROGRESS

Amanda Buckle, Seafood News

December 11, 2018 — [SEAFOOD NEWS](#) — The Offshore Wind Transit Working Group is inching closer to developing transit lanes for fishing vessels in Northeast Wind Energy Areas.

Members of the Responsible Offshore Development Alliance (RODA), as well as other fishing industry representatives, offshore wind developer lease-holders, the National Marine Fisheries Service (NMFS), the Bureau of Ocean Energy Management (BOEM) and the U.S. Coast Guard, convened in Newport, Rhode Island, earlier this month for the Working Group meeting, which aimed to develop fishery transit lanes through the Wind Energy Areas (WEA) in federal waters off of Massachusetts and Rhode Island.

Currently there are concerns about commercial fishermen safely traveling across WEAs to access fishing grounds. According to RODA, safety risks “greatly increase” due to the long distances that fishing boats may be required to take in order to get around or through the WEAs. To solve the issue, the working group is developing transit lanes.

The goal is for the group to come up with a transit lane option that preserves the most important routes to the historic fisheries. Some route options have been identified, but so far nothing has been finalized.

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Responsible Offshore Development Alliance

July 6, 2020

Mr. Jerry Barnes and Mr. Matt Creelman
Fifth Coast Guard District
431 Crawford Street
Portsmouth, VA 23704

Re: Port Access Route Study: Seacoast of New Jersey Including Offshore Approaches to the Delaware Bay, Delaware; Docket No. USCG-2020-0172

Dear Mr. Barnes and Mr. Creelman;

The Responsible Offshore Development Alliance (RODA) submits the following comments regarding the United States Coast Guard's (USCG) Notice of Study for the Port Access Route Study: Seacoast of New Jersey Including Offshore Approaches to the Delaware Bay, Delaware (hereafter referred to as the NJ/DE PARS).¹

RODA is a membership-based coalition of fishery-dependent companies and associations committed to improving the compatibility of new offshore development with their businesses. Our approximately 170 members are comprised of major fishing community groups, individual vessels, and shoreside dealers operating in federal and state waters of the New England, Mid-Atlantic, and Pacific coasts.

As we have detailed in previous comments to USCG and other regulatory agencies, RODA and its members are committed to safety at sea for the fishing industry and have played an ongoing role in the development of recommendations for turbine layout, orientation, and fishing vessel transit needs in wind energy arrays. RODA continues to urge the regulatory authorities, including USCG, to work together and to exercise special care in conducting analyses and gathering input from impacted fishermen in order to ensure that impacts are effectively addressed. We greatly value collaborating with these agencies—as well as offshore wind developers—on mutually satisfactory solutions that will support coexistence among multiple ocean uses. RODA strives to move quickly toward a future in which fishermen can work together with project proponents and federal and state authorities to productively and efficiently approach project design and mitigation in a manner that effectively reduces risk for both industries.

On May 27, 2020, RODA submitted a formal request for a public meeting for the NJ/DE PARS prior to June 4, 2020, as requested by the FR Notice.² Unfortunately we have not heard of an announced public meeting, virtual or otherwise, and are concerned that the deadline for public comment has remained unchanged. RODA strongly urges USCG to host a public meeting prior to initiation of this study to ensure sufficient opportunities for public input and engagement.

¹ 85 Fed. Reg. 26695 (May 5, 2020)

² See Letter from Lane Johnston, RODA, *Comments Submitted on Port Access Route Study: Seacoast of New Jersey Including Offshore Approaches to the Delaware Bay, Delaware; Docket No. USCG-2020-0172* (May 29, 2020)

Articles for Transmission



Responsible Offshore Development Alliance

August 10, 2020

New Jersey Board of Public Utilities
Joseph Fiordaliso, President
44 South Clinton Avenue, 9th Floor
Port Office Box 350
Trenton, New Jersey 08625-0305

Levitan & Associates, Inc.
20 Custom House Street
Suite 830
Boston, MA 02110

New Jersey Department of Environmental Protection
Catherine R. McCabe, Commissioner
401 E. State Street
7th Floor, East Wind
P.O. Box 402 Trenton, NJ 08625-0402

**Re: New Jersey Offshore Wind Transmission Information Gathering; Docket
No. QO20060463**

Dear President Fiordaliso, Commissioner McCabe and Levitan & Associates, Inc.;

The Responsible Offshore Development Alliance (RODA) submits the following comments regarding the Information Gathering for New Jersey Offshore Wind Transmission. We would like to thank New Jersey Board of Public Utilities (BPU) and Levitan & Associates, Inc. for including us in the discussion hosted on August 4, 2020 on fishing concerns associated with cabling and transmission.

RODA is a membership-based coalition of fishery-dependent companies and associations committed to improving the compatibility of new offshore development with their businesses. Our approximately 170 members are comprised of major fishing community groups, individual vessels, and shoreside dealers operating in federal and state waters of the New England, Mid-Atlantic, and Pacific coasts.

RODA constituents based in New Jersey believe that in light of the huge scale of proposed offshore wind energy areas in the Atlantic regulators and developers should have engaged in dedicated planning to coordinate transmission prior to identifying lease areas or designing projects. Instead, this critical issue that has enormous ramifications to fishing businesses, marine environments, and power production and pricing is being treated as an afterthought. As such, no new leasing or project approvals should occur before a coordinated transmission system is designed and required, with extensive input from the fishing industry. For an offshore grid system to be successful, it must hinge upon these two facts: 1) it is used by offshore wind companies and does not create more redundancies, and 2) it has been properly and comprehensively planned with substantial engagement with other ocean users, in particular fishermen, in order to avoid conflicts with operations and important habitat areas.

While RODA staff appreciates being included in the fishing webinar during the information gathering stage, the questions posed during the session seemed inappropriate for the participants on the call. Adequate technical information was not provided beforehand to give relevant insight, nor were

BROOKS MCKINNEY

Sep 16th 2020

Connecting Offshore Wind Energy to Onshore Users

To help reduce greenhouse gas emissions and U.S. reliance on [fossil fuels](#), more and more communities on the Eastern Seaboard are turning to offshore wind energy. As of early 2019, nearly 26 gigawatts of offshore energy were operational, in development or planned according to the [2018 Offshore Wind Technologies Market Report](#) developed by the [National Renewable Energy Laboratory](#) and the [U.S. Department of Energy](#).

How best to connect that power to onshore users – the top two contenders are dedicated transmission lines from each wind farm to shore, often called generator lead lines, and shared ocean transmission grids – has inspired earnest debate among wind farm developers, independent transmission developers, government agencies and environmentalists.

To be clear, there is currently only one operational offshore wind farm in the U.S – the five-turbine, 30-megawatt (MW) [Block Island Wind Farm](#) off the coast of Rhode Island – and no ocean transmission grids. Developed by Deepwater Wind (which was acquired by Danish power company [Ørsted](#) in 2018), Block Island became operational in 2016.

Reckoning With Risk

“In the near term, the transmission grid debate is complicated,” explained Kirsty Townsend, director of North American special projects for Ørsted, the world’s largest wind farm developer. “Many of the risks associated with such grids, such as the costs of onshore transmission upgrades or the costs of downtime or delays in development, have yet to be fully vetted and allocated appropriately, which poses a potential cost risk to consumers.”

Articles for Jobs



Responsible Offshore Development Alliance

August 10, 2020

New Jersey Board of Public Utilities
Joseph Fiordaliso, President
44 South Clinton Avenue, 9th Floor
Port Office Box 350
Trenton, New Jersey 08625-0305

Levitan & Associates, Inc.
20 Custom House Street
Suite 830
Boston, MA 02110

New Jersey Department of Environmental Protection
Catherine R. McCabe, Commissioner
401 E. State Street
7th Floor, East Wind
P.O. Box 402 Trenton, NJ 08625-0402

**Re: New Jersey Offshore Wind Transmission Information Gathering; Docket
No. QO20060463**

Dear President Fiordaliso, Commissioner McCabe and Levitan & Associates, Inc.;

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RODA constituents based in New Jersey believe that in light of the huge scale of proposed offshore wind energy areas in the Atlantic regulators and developers should have engaged in dedicated planning to coordinate transmission prior to identifying lease areas or designing projects. Instead, this critical issue that has enormous ramifications to fishing businesses, marine environments, and power production and pricing is being treated as an afterthought. As such, no new leasing or project approvals should occur before a coordinated transmission system is designed and required, with extensive input from the fishing industry. For an offshore grid system to be successful, it must hinge upon these two facts: 1) it is used by offshore wind companies and does not create more redundancies, and 2) it has been properly and comprehensively planned with substantial engagement with other ocean users, in particular fishermen, in order to avoid conflicts with operations and important habitat areas.

While RODA staff appreciates being included in the fishing webinar during the information gathering stage, the questions posed during the session seemed inappropriate for the participants on the call. Adequate technical information was not provided beforehand to give relevant insight, nor were

RODA SUBMITS COMMENTS ON PROPOSED CHANGES TO INTERPRETATION ON THE JONES ACT

Responsible Offshore Development Alliance

November 18, 2019 — *The following was released by the [Responsible Offshore Development Alliance](#):*

On Friday, the Responsible Offshore Development Alliance (RODA) submitted a letter to the U.S. Customs and Border Protection expressing serious concern with proposed modifications to ruling letters that would allow non-Jones Act compliant vessels to be utilized for a wide range of offshore activities, including offshore wind energy facility construction.

For nearly a century, fishermen have complied with the Jones Act. RODA is concerned that the proposed modifications and revocation of ruling letters to CBP's application of the Jones Act would not hold offshore wind energy developers to the same standards. The proposed definition is too broad and violates the purpose of the Jones Act. Carving out a broad exemption for an entire new industry does nothing to aid the development of U.S. marine commerce.

As the number of proposed offshore wind energy projects continues to grow throughout the U.S., their widely promised economic benefits must accrue to the citizens who are displaced, and to U.S. coastal communities at large. For offshore wind energy-related operations that can be executed with existing American vessels and crew, this means delivering on promises to fully utilize those resources. For larger construction tasks for which there may not currently be qualified vessels, foreign-owned wind energy companies should contract with U.S. shipyards to build the necessary Jones Act-qualified boats.

The actions proposed in the notice also have significant bearing on national security and environmental protection. Monitoring and enforcement of U.S. environmental and security laws on foreign vessels poses extraordinary challenges due the additional permissions needed by the Coast Guard to board non-U.S. flag vessels.

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