

## Statement of Gulf of Maine Fishing Associations on Final Wind Energy Areas

March 18, 2024 -- The Bureau of Ocean Energy Management's (BOEM) final designation of an enormous Wind Energy Area (WEA) for the Gulf of Maine is the culmination of a rushed development process that is poorly informed on economic, scientific, environmental and cultural issues of paramount importance. Without adequate consideration of these issues, leasing in BOEM's WEA designation should not be pursued.

The government has designated this huge portion of the Gulf of Maine as suitable for wind energy installations with capacity to produce up to 32 gigawatts (GW) of energy. This number far exceeds the coastal states' combined goal of 13 GW, the New England grid operator's suggestion of 18 GW, and even the American Clean Power Association's requested 20 GW.

We acknowledge that the Final WEA improves on earlier efforts in some respects. First, BOEM implemented a nascent spatial modeling process that more explicitly shows ocean use, and this process should be continued and improved. Second, Lobster Management Area 1 (LMA 1) was excluded from energy development in recognition of the importance of protecting Maine, New Hampshire, and Massachusetts' iconic lobster fisheries which represent the majority of fishing activity in the region. We are grateful to state and federal leaders, specifically in Maine, for working with the industry in advocating to exclude LMA 1 from the Final WEA. We believe the unprecedented size of the WEA presents further opportunities to ensure that any future lease areas will avoid locations that pose threats to fisheries, habitat, and protected resources.

Despite improvements, the Final WEA leaves a large area open to offshore wind development which directly imperils commercial fishing, sensitive habitats, and maritime communities that depend on the fishing industry. The portion of the WEA formerly called "Secondary area C" is particularly concerning because it encompasses prime groundfishing territory, now slated to close permanently to fishermen who are ably stewarding it.

"Secondary Area C" has been frequented by endangered North Atlantic right whales in recent years. Ocean industrialization in this area is flatly inconsistent with a policy of endangered species protection. Serious questions persist regarding the contributions of offshore wind activity to recent whale mortality throughout their Atlantic range. Fishermen are disheartened that the WEA designation favors foreign energy developers over marine mammal protection. This preferential treatment is in stark contrast to the federal government's aggressive campaign to burden commercial fishing needlessly with crushing restrictions to protect whales.

Furthermore, the Final WEA displaces fleets operating in and around Wilkinson's Basin and off Massachusetts, areas the groundfish industry has demonstrated time and time again to be vital to the health and longevity of their fishery.

The Gulf of Maine WEA was finalized at a breakneck pace without adequate consideration of interactions with fisheries and long-term environmental impacts. Too many questions remain unanswered. Research such as that envisioned through the Gulf of Maine research array to study wind-marine environment interactions and identify strategies to avoid and reduce impacts from commercial scale offshore wind development has not been conducted. Nor has sufficient time been

set aside to follow best practices in ocean modeling, which should include significantly greater transparency and meaningful partnerships with fishermen as longstanding ocean stewards who hold generations of important ecological knowledge.

There is no known process for removing an area that is already part of a WEA and with large projects already approved elsewhere along the Atlantic Coast there is no reason to expedite leasing in this WEA. To avoid wasteful over-development and ensure responsible planning for any potential offshore wind development in the Gulf of Maine, BOEM should defer this action until the experience from other offshore wind developments can inform planning for the Gulf of Maine. The government should delay its ill-suited timeline to avoid front-running science and real world experience that should guide this important natural resource management decision.

Alewife Harvesters of Maine  
Atlantic Offshore Lobstermen's Association  
Cape Cod Commercial Fishermen's Alliance  
Downeast Lobstermen's Association  
Fisheries Survival Fund  
Gloucester Fishermen's Wives Association  
Maine Coast Fishermen's Association  
Maine Elver Fishermen Association  
Maine Lobstering Union  
Maine Lobstermen's Association  
Massachusetts Fishermen's Partnership  
Massachusetts Lobstermen's Association  
Massachusetts Seafood Collaborative  
New England Fishermen's Stewardship Association  
New England Young Fishermen's Alliance  
New Hampshire Commercial Fishermen's Association  
Responsible Offshore Development Alliance