



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
MARINE FISHERIES ADVISORY COMMITTEE  
Silver Spring, MD 20910

November 15, 2019

MEMORANDUM FOR: Chris Oliver  
Assistant Administrator for Fisheries

FROM: Erika Feller   
Chair, Marine Fisheries Advisory Committee

SUBJECT: Marine Fisheries Advisory Committee Letter to the Secretary on  
Offshore Wind

This memo transmits a letter from NOAA's Marine Fisheries Advisory Committee's (MAFAC) to Secretary Ross that relays the Committee's concerns about the rapid pace of national offshore wind development; its impacts on fishermen and important marine ecosystems, protected resources, and fisheries; and the challenges it poses to NOAA Fisheries' mission.

Specifically, MAFAC's concerns address unfunded mandates for NOAA Fisheries and impacts on annual surveys and other science enterprise activities, lack of understanding about potential cumulative impacts to the marine environment, and the lack of a national, strategic approach to engage multiple stakeholders.

This letter was approved by the Committee at our recent meeting in Silver Spring, Maryland on October 17, 2019 and we respectfully request that it be submitted to Secretary Ross for his consideration.

Attachment





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MARINE FISHERIES ADVISORY COMMITTEE  
Silver Spring, MD 20910

November 15, 2019

The Honorable Wilbur Ross, Secretary  
U.S. Department of Commerce  
1401 Constitution Ave., N.W.  
Washington, DC 20230

Dear Secretary Ross:

As representatives of a diverse marine user community, the Marine Fisheries Advisory Committee (MAFAC) is concerned about the rapid pace of national offshore wind development. Offshore wind energy development projects are the furthest along in the U.S. Atlantic Coast with the Bureau of Ocean Energy Management (BOEM) reviewing several construction and operations plans within New England and the Mid-Atlantic. There are currently 15 active commercial offshore wind leases in the Northwest Atlantic Shelf from North Carolina to Massachusetts (covering 1.7 million acres of ocean bottom) with additional lease areas under consideration. Many of these lease areas encompass historic, productive fishing grounds. Recently, BOEM has initiated the process for offshore wind development along the Pacific and Hawaiian coasts.

The MAFAC members will continue their discussions about the potential interactions from ocean wind development that pose challenges to NOAA Fisheries' mission. Specifically, MAFAC is initially concerned with the following:

- a. Unfunded mandates. The MAFAC feels it is critical to secure a funding source and process for the expanded demand for regulatory, socio-economic and scientific services by securing annual funding sources to support NOAA Fisheries Science Center, Regional Office and Headquarters activities including research associated with developing a baseline (typically understood to be developed before permitting and construction begins) and monitoring construction and operations impacts.
- b. Lack of understanding about the potential cumulative impacts to marine ecosystems, protected species and fisheries, given lease sale EISs are developed for particular wind energy areas, which are more localized rather than a coast-wide assessment.
- c. Understanding how NOAA Fisheries annual surveys and other science enterprise activities may be impacted, and what can be done at both the leasing and permitting process to mitigate impacts.
- d. Lack of a national, strategic approach that implements a process to engage multiple stakeholders, in addition to mandatory public comment periods.

MAFAC supports the existing Memorandum of Understanding between NOAA, BOEM, and the Responsible Offshore Development Alliance (RODA), and recommends it be implemented for the Gulf of Mexico, west coast, Hawaii, and Alaska regions. Finally, MAFAC supports the



continued involvement of NOAA Fisheries in the Responsible Offshore Science Alliance (ROSA) as the organization works to develop regional monitoring programs for offshore wind.

As your stakeholders and advisors, MAFAC will continue to work on the concerns that we outlined and will develop detailed recommendations to submit to you and NOAA.

Respectfully,

A handwritten signature in black ink, appearing to read "Erika Eeller", is centered on a light gray rectangular background.

Erika Eeller  
Chair