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December 16, 2022

Bridgette Duplantis
BOEM Office of Leasing and Plans
1201 Elmwood Park Blvd.
New Orleans, LA 70123

RE: Docket No. BOEM-2022-0072
Draft Wind Energy Areas – Commercial Leasing for Wind Power Development on the
Central Atlantic Outer Continental Shelf (OCS)

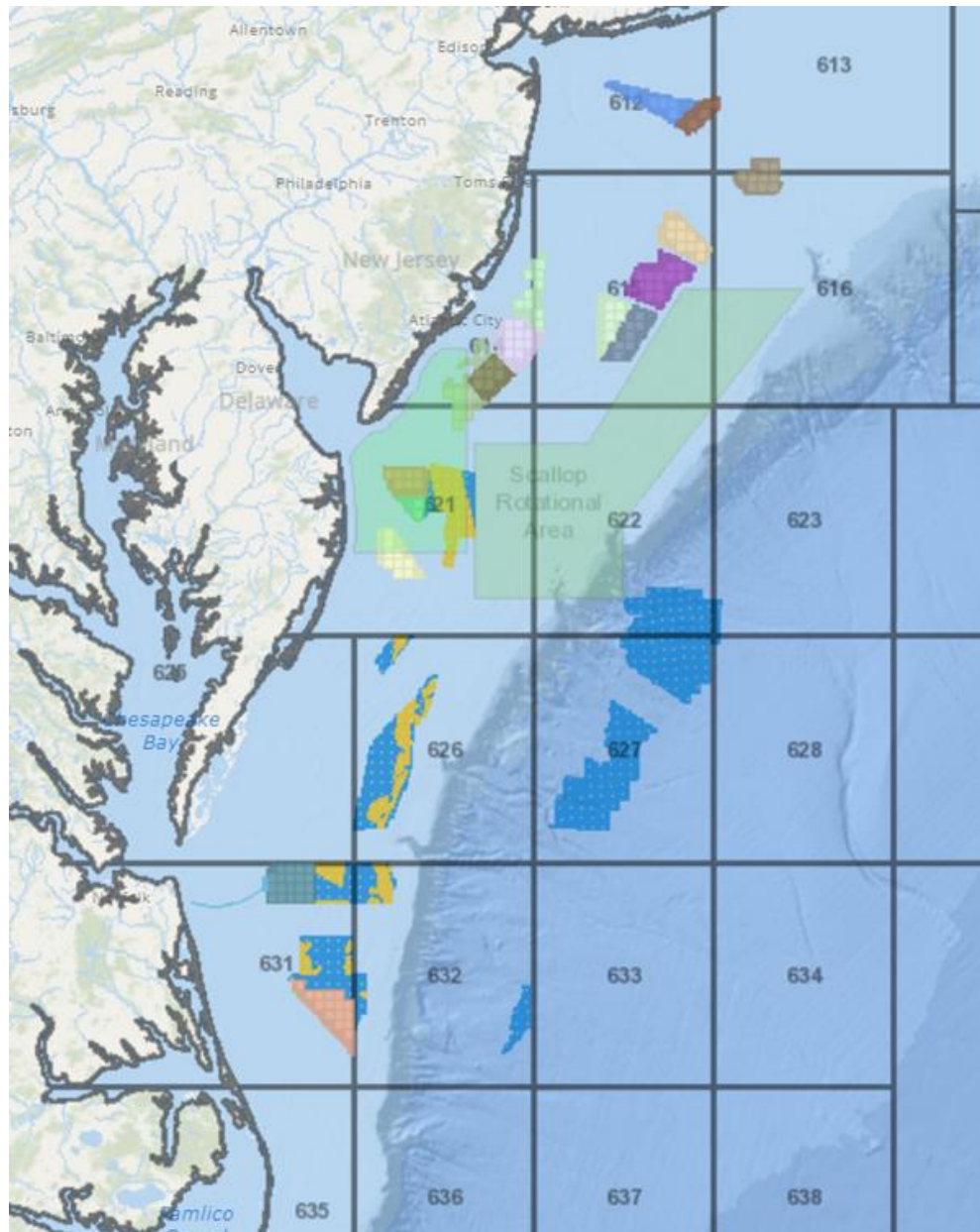
Dear Ms. Duplantis:

The New Jersey Department of Environmental Protection (NJDEP) appreciates the opportunity to provide comments on the Draft Wind Energy Areas – Commercial Leasing for Wind Power Development on the Central Atlantic Outer Continental Shelf (OCS). Further, NJDEP appreciates the collaboration between BOEM and the National Oceanic and Atmospheric Administration's National Centers for Coastal Ocean Science to use an ocean planning model to minimize ocean user conflicts.

As described in NJDEP's June 28, 2022 comment letter, New Jersey fisheries would be impacted by offshore wind development in the Central Atlantic Call Areas; specifically, fishery landings, revenue, and ports¹; and New Jersey's two most valuable fisheries, sea scallop and surfclam/ocean quahog, have the potential to be most impacted². As described in detail below, Call Areas A and C are most important to New Jersey fisheries.

¹ Christel, D. 2022. Data provided by email to Central Atlantic States Offshore Wind group, 6/1/2022.

² Kirkpatrick, A.J., S. Benjamin, G.S. DePiper, T. Murphy, S. Steinback, and C. Demarest. 2017. Socio-Economic Impact of Outer Continental Shelf Wind Energy Development on Fisheries in the U.S. Atlantic. Volume I—Report Narrative. U.S. Dept. of the Interior, Bureau of Ocean Energy Management, Atlantic OCS Region, Washington, D.C. OCS Study BOEM 2017-012. 150 pp.



Call Area A is actively used for commercial fishing and transit by New Jersey vessels. Area A is located in NOAA Statistical Area 621, where, between 2017 and 2021, New Jersey fishers landed over 155 million pounds, not including surf clam/ocean quahogs, using gear that is most likely incompatible with offshore wind structures (including dredge (1937 trips), seines (934), gill net (486), and otter trawls (145)). In terms of cumulative impacts, three existing offshore wind projects, Garden State, Skipjack, and US Wind, are also located in this single Statistical Area (see map). This broad area is a major transit zone for vessels leaving and entering Cape May, and transit safety will likely be affected by turbines, particularly in adverse weather. Scallop vessels are further limited in their transit by the Mid-Atlantic Access Area (MAAA) Scallop Rotational Area (see green polygon in map). Scallop vessels cannot freely enter this rotational area while transiting to other fishing grounds. NJDEP agrees with the results of the Fisheries Sub model of the NCCOS study, which indicated that Area A was least suitable for mitigating fisheries impacts.



Significant impacts to New Jersey fisheries are anticipated if Area A is developed, particularly for the scallop, surfclam/ocean quahog, and menhaden fisheries. Effective mitigation and cumulative impacts should be further considered.

Additionally, offshore wind development in Call Area C is particularly problematic for the surfclam industry. There is evidence that this area has a significant surfclam resource, and recent fishing efforts are not shown in publicly-available VMS data. Specifically, Surfside Foods has reported to NJDEP that in 2021, the company began fishing in Call Area C and generated 10% of coastwide revenue there. Also, Rutgers University is currently evaluating this surfclam population. Therefore, more research is needed to fully evaluate the stock and potential economic impacts to this valuable industry prior to leasing.

NJDEP also notes that as final Wind Energy Areas for the Central Atlantic are established, careful consideration of minimizing impacts from transmission cables will be necessary to mitigate impacts to New Jersey's fisheries and habitat resources.

As BOEM moves forward in developing the Central Atlantic Area, please consider that the potential impacts to New Jersey's commercial and for-hire fisheries from offshore wind are not well understood, particularly socio-economic impacts and cumulative impacts. We also note that New Jersey's port towns should be evaluated to determine whether they are at particular risk. Data is available for some fisheries that indicate losses could far exceed landings revenue. Docks, processing facilities, shipping, and other secondary industries could all be impacted.

Thank you for providing the New Jersey Department of Environmental Protection with the opportunity to comment on the Draft Central Atlantic WEAs. If you have any questions or would like to discuss any of these comments, please contact Elizabeth Lange at Elizabeth.Lange@dep.nj.gov.

Sincerely,



Megan Brunatti
Deputy Chief of Staff

