



Gulf of Mexico Fishery Management Council

Managing Fishery Resources in the U.S. Federal Waters of the Gulf of Mexico

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February 9, 2022

Mrs. Tershara Matthews
Chief, Emerging Programs
Office of Regional Director
Gulf of Mexico Regional Office
Bureau of Ocean Energy Management
1201 Elmwood Blvd.
New Orleans, LA 70123

Mr. Andy Strelcheck
Regional Administrator
National Marine Fisheries Service
Southeast Regional Office
263 13th Ave. S.
St. Petersburg, FL 33701

Dear Mrs. Matthews and Mr. Strelcheck:

During its January 2022 meeting, the Gulf of Mexico Fishery Management Council (Council) received a presentation from the Bureau of Ocean Energy Management (BOEM) on renewable wind energy in the Gulf of Mexico (Gulf) and reviewed relevant motions from the Council's advisory panels on this topic. The Council is providing the following comments and three requests regarding potential impacts of offshore wind energy development, including offshore facilities and transmission lines, on all essential fish habitat in the BOEM Call Area in the Gulf.

The Council commends the National Oceanic and Atmospheric Administration, National Centers for Coastal Ocean Science on the development of the Aquaculture Opportunity Areas Atlas¹. This spatial analysis tool is an effective tool for considering appropriate uses for regions of the Gulf with competing uses. First, the Council thinks this approach for spatial planning would be useful for BOEM to implement during the siting of offshore wind facilities and transmission lines, to minimize adverse impacts to the Gulf fishing industry. As one example of competing ocean uses, the Council's Shrimp Advisory Panel expressed concern about the potential impacts on routes for shrimp trawling caused by turbine placement and the potential for excessive dredging for burial of transmission lines. To further enhance the information for decision-making, spatial analyses for evaluating potential sites for offshore wind energy facilities and transmission lines in the Gulf should include and consider the complete historical Gulf shrimp fishing effort data. Areas of high effort by the Gulf shrimp industry likely represent areas of high profitability, as a combination of increased shrimp abundance and lowered trip costs. Close consideration should therefore be given

¹ https://coastalscience.noaa.gov/data_reports/an-aquaculture-opportunity-area-atlas-for-the-u-s-gulf-of-mexico/

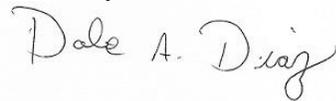
to the economic impacts resulting from potential effort shifting to other geographic areas by the industry as a result of placement of turbines and transmission lines.

Second, the Council requests that BOEM enter into consultations, as early in the process as possible, with the National Marine Fisheries Service pursuant to Section 7 of the Endangered Species Act (ESA) with respect to any action that BOEM takes or proposes to take to authorize offshore wind energy development in the Gulf that may affect any ESA listed species or designated critical habitat. In doing so, potential impacts on ESA listed species or designated critical habitat may be minimized, and managed fisheries which are held accountable for adverse impacts on such species or habitats may avoid additional regulations to restrict access and harvest.

Lastly, the Council requests consideration of membership on BOEM's Gulf of Mexico Intergovernmental Renewable Energy Task Force. While the Council recognizes that some of its Gulf state agency members are currently on the Task Force, the Council represents a regional approach to Gulf fishery management, and its members possess expertise related to various aspects of a diverse Gulf fishery. Therefore, a representative from the Council would allow BOEM to directly address fishing considerations in offshore wind development in the Gulf.

We are appreciative of the presentations given by BOEM, and we thank you for your consideration of the above requests. If you have any questions, please do not hesitate to contact Dr. Matt Freeman at the Council office.

Sincerely,

A handwritten signature in cursive script that reads "Dale A. Diaz".

Mr. Dale Diaz
Council Chair

cc: Council Members / Council Staff / Mara Levy / Jack McGovern, Ph.D. / Clay Porch, Ph.D.
/ John Walter, Ph.D. / Noah Silverman