



Massachusetts Lobstermen's Association, Inc.

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via email: marfp83C@gmail.com

Request for Approval of 83D RFP
Filed with Massachusetts Department
of Public Utilities

Re: 83D RFP to the Massachusetts Department of Public Utilities – Stakeholder comments

To Whom It May Concern:

On behalf of its 1800 members, the Massachusetts Lobstermen's Association (MLA) respectfully submits this letter of comment to the Massachusetts Department of Energy Resources ("DOER"), the Massachusetts Office of the Attorney General ("AGO"), and electric distribution companies that operate in Massachusetts ("EDCs"), collectively known going forward as "Agencies" on the development of Offshore Wind (OSW).

Established in 1963, the MLA is a member-driven organization that accepts and supports the interdependence of species conservation and the members' collective economic interests. The membership is comprised of fishermen from Maryland to Canada and encompasses a wide variety of gear types from fixed gear and mobile gear alike. The MLA continues to work conscientiously through the management process with the Division of Marine Fisheries (DMF) and the Atlantic States Marine Fisheries (ASMFC) and the New England Fisheries Management Council (NEFMC) to ensure the continued sustainability and profitability of the resources in which our fishermen are engaged in.

The MLA is also actively involved with the Northeast Regional Ocean Council (NROC) stakeholders' processes, the Massachusetts Coastal Zone Management (CZM), the Bureau of Ocean and Energy Management (BOEM) and MA Ocean Planning processes to ensure the recommendations of the commercial fishermen are vetted and ultimately implemented.

The MLA members are encouraged by the Agencies effort for industry and stakeholders input and feedback on *An Act to Promote Energy Diversity*. As noted above the MLA is actively and at the table with BOEM, CZM and NROC and have at all levels commented on the need for the commercial fishermen to be part of these discussions on the industries needs is a must, when it comes to a multi jurisdictional projects. The MLA continues to strongly recommend having active commercial fishermen fishing in the affected areas from each state at the table.

The MLA advocates being an intricate part of the process and at the table for all OSW projects slated for the waters here in Southern New England. Given the warming water in Southern New England, our fishermen have moved into deeper waters and we have numerous fishermen from a variety of fisheries fishing in these waters that will be greatly and negatively impacted by all of these projects such as gillnetters, charter boats, longline, highly pelagic species and crab.

While the MLA has many concerns about OSW we are however, extremely concerned that initial studies be conducted not only the lobster resource but also on the entire benthic habitat prior to construction of any wind turbine in Southern New England. We are also concerned about the safety of the fleet and their ability to safely transit to and from their homeports. We strongly ask that more research be done on the impacts of the OSW turbines and the interaction with radar on the vessels. The port of New Bedford is a hub for the commercial fishing industry and the OSW lease areas are directly southeast from here and is highly travelled by the fleet.

We are also concerned about the long-term impacts of OSW to the endangered North Atlantic Right Whale (NARW). While the commercial lobster and fixed gear industries are continually constrained because of potential future interactions with these animals, there is not enough known about the impacts of OSW construction, electromagnetic fields and noise impacts on the NARW? Currently, we have being told by whale specialists at the New England Aquarium that the NARW birthrates are declining, what is the impact of OSW have on these highly protected species? More research is undeniably needed in this area of concern so that the commercial fleet does not further endure any more baseless constraints.

Throughout the OSW mitigation process we are hopeful that the Agencies will see the value in engaging and using the Lobster Foundation of Massachusetts (LFoM), which is the MLA's 501c-3, to engage with the industry on their concerns and to do the research the industry is requesting. The LFoM was created to do independent research in conjunctions with the MADMF and other government and academics on an as need basis to assess and determine the survivability of the lobster stocks in any given area as well as other species of concerns to the entire commercial fleet.

In closing, we are hopeful that the Agencies will consider utilizing the LFoM as a conduit to do the industries research that is of great concern while working collectively with the OSW companies and the other research projects prior, during and post construction of OSW. For more information on the LFoM please visit <http://lobsterfoundationofma.org>

We would like to thank Agencies for their continued efforts to engage the commercial fishing industry stakeholders throughout this lengthy process and are encouraged that they will do their due diligence when vetting and engaging any industry representative. Should there be any further questions or comments please feel free to call me at 781-545-6984.

Sincerely,

Beth Casoni

Executive Director