

# NOAA responds to Vineyard Wind, BOEM; Issus MOU

by Capt. David Monti



Three cheers for NOAA! They did a very detailed analysis (a 44 page letter) of Vineyard Wind's Environmental Impact Statement (EIS). NOAA's National Marine Fisheries Service (NMFS) comments were released last week.

The letter highlights NOAA's concern about possible negative impacts of the project on fish, fisheries and habitat. NOAA stated that the most current fishery landings and revenues were not used in the EIS analysis.

Additionally, the letter said *"Related to fish and fisheries, there is limited analysis of areas of mortality, injury, and behavioral impacts, particularly spawning activity for relevant species and potential loss in catch resulting from pile driving activities."*

In my opinion we need NOAA to review plans like this as they know ocean habitat and fisheries, whereas this is not the primary focus of the Bureau of Ocean Energy Management (BOEM). Yet, the entity responsible of wind farms (BOEM) has all the authority and they only have to consult in NOAA.



So I was delighted this week when BOEM announced a [Memorandum of Understanding](#) (MOU) between the commercial fishing industry, BOEM and NOAA to safeguard fish and habitat as wind farms develop.

However, the recreational fishing community was missing as partners in the MOU. No recreational fishing partners were listed as having a seat at the table in the MOU.

So although the MOU is a step in the right direction... BOEM, NOAA and wind farm developers should consider incorporating recreational fishing in their planning. In some states that have wind farms developing off their shore recreational fishing is just as important, delivering an equal or greater economic impact to the state.

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