



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
DIVISION OF MARINE FISHERIES
Three Fort Wetherill Road
Jamestown, Rhode Island 02835

June 28, 2022

Bridgette Duplantis
Office of Leasing and Plans
Bureau of Ocean Energy Management
1201 Elmwood Park Boulevard
New Orleans, Louisiana 70123

RE: Docket No. BOEM–2022–0023: Call for Information and Nominations — Commercial Leasing for Wind Power Development on the Central Atlantic Outer Continental Shelf (OCS)

Dear Project Coordinator,

The Rhode Island Department of Environmental Management Division of Marine Fisheries has reviewed the Bureau of Ocean Energy Management’s Call for Information and Nominations (Docket No. BOEM-2022-0023) — Commercial Leasing for Wind Power Development on the Central Atlantic Outer Continental Shelf (OCS) and offer the following comments:

- Squid are the species of greatest concern for Rhode Island fishermen as it relates to the Wind Power Development on the Central Atlantic OCS given they are two of the species with the highest landings values from this area to Rhode Island. Based on VMS data between 2006 and 2014 available on the Northeast Ocean Data Portal, the areas represented in the Call appear to avoid the primary fishing grounds for the longfin and Illex squid fisheries. However, there is high interannual variability in both the abundance and distribution of squid, and subsequently the harvest, which can make annual average of harvest over a set of years perhaps unable to capture the true value of these areas to the fleet. Additionally, given the variability in the species abundance and distribution, it is feasible that there may be years in the future when these areas are significant to these species and the fisheries they support.
- Landings of squid appear to be greatest from Area E, followed by Area B (Table 1). The total value of Area E for both species across the thirteen years of data available from the NOAA Fishing Footprints tool is \$7,052,000.
- Squid harvest locations should be considered as areas are truncated to a smaller, refined wind lease areas, as impacts to the Rhode Island squid industry may occur if these sites are developed in full.
- BOEM should also be aware that Call area B intersects with the Scup Southern Gear Restricted Area (Figure 1). Vessels fishing for longfin squid, black sea bass, or whiting in the Southern GRA from January 1 through March 15, must have a minimum mesh size of 5-inch diamond mesh to maintain low levels of scup discards in small-mesh fisheries while allowing those fisheries to access longfin squid (Framework Adjustment 9 to the Summer Flounder, Scup, and Black Sea Bass Fishery Management Plan). This may indicate that mobile gear fishing for longfin squid, black sea bass, and whiting may be affected by development in the southeastern portion of Call Area B.

Table 1. Thirteen-year total landings revenue from call areas based on data from the NOAA Fishing Footprints tool

Species	Area A	Area B	Area C	Area D	Area E	Area F
Illex Squid	\$389,000	\$2,090,000	\$623,000	\$1,361,000	\$3,828,000	\$1,158,000
Longfin Squid	\$479,000	\$1,852,000	\$289,000	\$750,000	\$3,224,000	\$432,000
Combined	\$868,000	\$3,942,000	\$912,000	\$2,111,000	\$7,052,000	\$1,590,000

We sincerely thank you for the opportunity to provide comments on the Call for Information and Nominations and recommend that BOEM contact the state of Rhode Island regarding any further economic analyses on state-level impacts to be conducted on the call areas. Should you have any questions or comments regarding these recommendations, please feel free to contact Julia Livermore (julia.livermore@dem.ri.gov; 401.423.1937).

Sincerely,



Conor McManus
Chief of Marine Fisheries

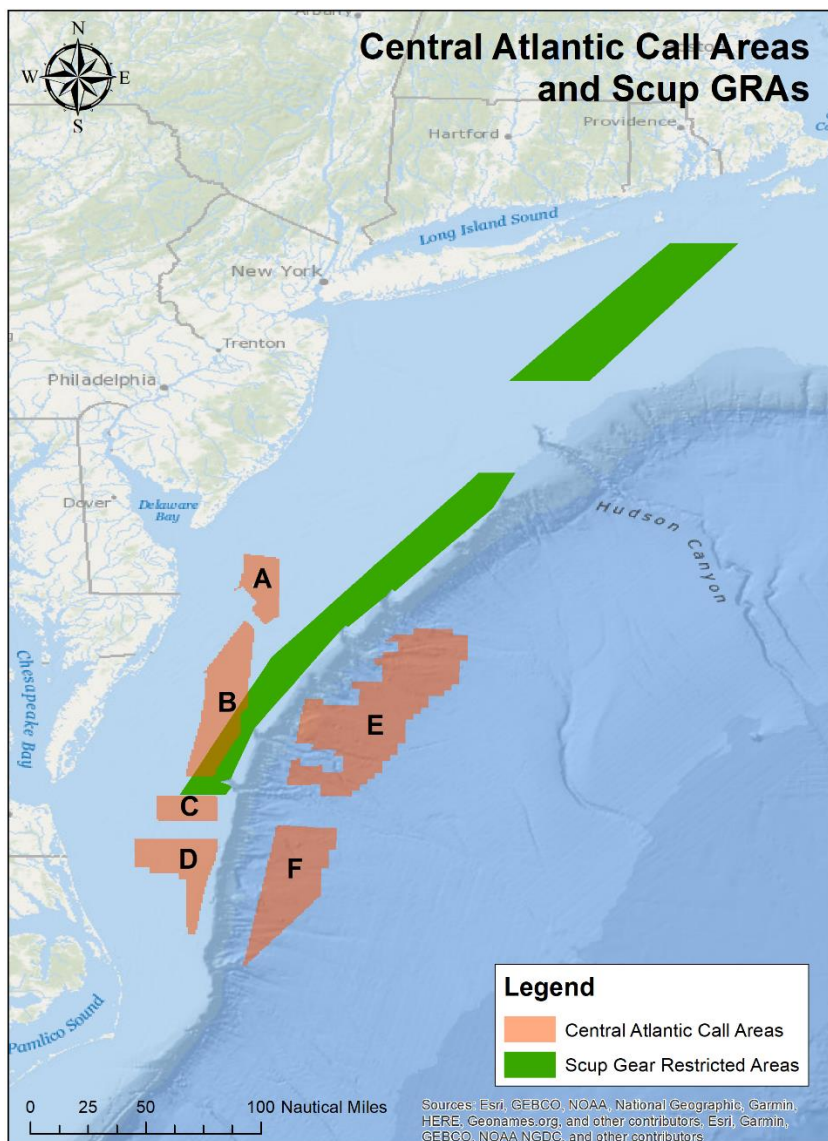


Figure 1. Intersection between the Scup Southern Gear Restricted Area and Call A B