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PG 10



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PG 25



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PG31



Daniel J. McKiernan
Acting Director

Commonwealth of Massachusetts

Division of Marine Fisheries
251 Causeway Street, Suite 400
Boston, Massachusetts 02114
(617)626-1520
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March 6, 2020

Michael Pentony, Regional Administrator
NOAA Fisheries, GARFO
55 Great Republic Drive
Gloucester, MA 01930

RE: Massachusetts Right Whale Conservation Plan 2020

Dear Mr. Pentony,

The Massachusetts Division of Marine Fisheries offers the following proposal to amend the Atlantic Large Whale Take Reduction Plan and provide protection for right whales in Massachusetts coastal waters (see attachment titled Massachusetts Right Whale Conservation Plan 2020). The Division has been a committed member of the TRT since its inception. We are committed to developing a comprehensive strategy to reduce the risk of entanglement and serious injury and mortality to North Atlantic right whales that maintains a safe, efficient, and profitable lobster fishery in Massachusetts.

Sincerely,

Daniel J. McKiernan

ATTACHMENT A 2020 Massachusetts Right Whale Conservation Plan

Background

Over the last several months, the Massachusetts Division of Marine Fisheries (DMF) has worked closely with the National Marine Fisheries Service and the Massachusetts lobster industry to develop conservation measures to augment protections for right whales under the Atlantic Large Whale Take Reduction Plan. We understand the challenge in identifying conservation measures that meet the 60% risk reduction target but are still workable for the fishing industry. Given the current trajectory of the right whale population and the high abundance of whales observed in Massachusetts waters each year, we are committed to achieving an overall goal of 60% risk reduction in our waters.

However, meeting that goal is especially complicated in Massachusetts because we are the only state with multiple lobster management areas (LMA) in our waters. Each area has their own unique lobster management strategy, level of fishing effort, and trends in effort. In addition, each area has varying patterns of whale distribution and abundance.

In our deliberations about conservation measures, we considered three categories; measures that address acute entanglement risk,

Continued on page 2

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COVER STORY

measures that address dispersed entanglement risk, and measures that mitigate for serious injury and mortality (SIM) and sub-lethal effects. Acute entanglement risk is that posed to a dense, consistent, and largely predictable aggregation of whales. Whereas dispersed entanglement risk is that posed to single whales or small groups of whales whose movements are unpredictable and observed distribution occurs infrequently. Mitigating the risk of SIM and sub-lethal effects is focused on reducing harmful impacts to whales in the event that an entanglement occurs.

Acute Entanglement Risk

We feel that the appropriate management tool to address acute entanglement risk at this time is the elimination of risk through a seasonal closure to fixed fishing gear. Approximately 65% of the known right whale population visits Cape Cod Bay each year. This is the largest known aggregation of North Atlantic Right whales in the world. In a single day in April 2017, a total of 179 right whales were observed in Cape Cod Bay. This represents a peak observed density of 10 right whales/cubic mile of water. To put this in perspective, the Gulf of St. Lawrence, an area which hosts large aggregations of right whales in recent years and has been the epicenter of an Unusual Mortality Event since 2017, has only ever reached a known peak density of 0.012 whales per cubic mile of water, in June 2018. This underscores the importance

of the Massachusetts Bay Restricted Area (MBRA) as an effective means of eliminating entanglement

Massachusetts Right Whale Conservation Plan 2020

risk and subsequent serious injury and mortality to right whales. The MBRA closure likely represents the single most important conservation measure to right whales in the United States.

The Division of Marine Fisheries (DMF) has been proactive in ensuring the effectiveness of the state waters portion of the MBRA closure. We have done this by implementing a dynamic extension of the fixed gear closure in the state waters portions of the Mass Bay Restricted Area if the presence of right whales extends past the closure end date. The size, location and duration of the closure extensions are created by DMF through the director's authority using data on whale distribution and abundance from the Provincetown Center for Coastal Studies (PCCS) aerial surveillance team. Furthermore, with help from the Massachusetts Environmental Police we regularly patrol Cape Cod Bay to identify and remove any derelict or abandoned fishing gear to further reduce the risk of entanglement.

Ropeless fishing represents another possible means to mitigate acute entanglement risk. It is our belief that the technology and concomitant fisheries management framework necessary to execute ropeless fishing is not sufficiently developed at this time to allow it in a manner that is safe, cost effective, compatible with high gear densities, and compatible with important

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Safe on the water and good fishing!

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Micheal Russo	Adventure	Province Town
Dale Batchford	Patty-B	Hampton NH
Raymond Joseph	Denneen Marie	Chatham
Wayne Adams	Jealous Lady	Seabrook

Calendar of Events

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MASSACHUSETTS LOBSTERMEN'S ASSOCIATION, INC.
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IN MEMORY OF ROBERT A. WHEELER

This application should contain accurate and detailed information and be accompanied by a copy of your official high school transcript that is signed and sealed.

Name: _____

Home Address: _____

City/Town: _____ State: _____ Zip: _____

Father, Mother and/or guardian's Name: _____ Occupation: _____

Are they a current member of the Mass. Lobstermen's Association? [☐] Yes [☐] No

Are both parents living? [☐] Yes [☐] No

Number & Ages of siblings living at home: _____

Do you have anyone financially dependent upon you? [☐] Yes [☐] No

If yes, please explain: _____

How much financial aid is expected in your first year of college / trade school: _____

Name of High School and year of graduation: _____

Name of college or trade school you expect to enter: _____

Have you been accepted for admission: _____

What is your anticipated tuition: _____

Have you received any other scholarships - If yes, state amount(s): _____

What business or profession do you expect to prepare for: _____

What extra-curricular activities have you participated in: _____

REFERENCES: **Please enclose any letters of recommendation** and **at least two** from the following choices: School Principal, Guidance Counselor, Instructor in your major, Pastor or Minister.

Please write a short paragraph explaining why you are interested in your field of endeavor:

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SIGNATURE: _____ DATE: _____

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As the HAULER TURNS



There are no words that can express my heartfelt concern for everyone's well being, I truly hope everyone is doing well and being smart during these unprecedented times with the COVID-19 pandemic. We are all doing our best to be mindful of everyone's needs, health and welfare as life as we know it has come to a screeching halt. Surreal, is what comes to mind as we try to navigate through these uncharted waters.

Over the last few weeks, I have been on the phone and corresponding with Senator Markey, Senator Warren, Congressman Moulton, and Congressman Keating's office asking them for immediate relief for the commercial lobster industry as all the markets products has come to a halt. They all indicated to us that language has been included in the 2 trillion dollar relief package to specifically name commercial fishermen and the shore side businesses. This is a great step forward and more information will be made available once we know more.

In wake of the current world COVID-19 pandemic, this state of affairs has really put the other matters, predicaments and grievances in check as we are steadfastly working on ALL the other complexities in the world of commercial fishing. The right whale regulations are still moving slowly forward, the development of offshore wind is not slowing down, the MLA's Annual Weekend & Industry Trade Show

2020 has been canceled, and the lobster market has come to a standstill. It feels like taking 10 steps forward only to get pushed back 20, with no end insight.

On March 6, 2020, the Division of Marine Fisheries (DMF) submitted their Right Whale Conservation Plan 2020 (Plan) to NOAA Fisheries. A lot of the Plan measures were covered at length during the recent Scoping Meetings as well at the last MLA Delegates. There were a lot of questions asked by the industry and the DMF answered all the questions as best as they could and noted they would get back to individuals with follow up clarifications.

Remember there are two pending law suits against the federal government and Massachusetts.

The Plan is in this newspaper for you to read and digest. There is one clarification that should be noted; on pg22 under the Plans Mitigation of SIM and Sub-lethal Effects, this has been clarified by the DMF to NOAA that this is for vertical lines ONLY. There is no discussion to change

what you use for groundlines. Once NOAA has reviewed all the states Plans they will come out with management options for public hearings later this year (TBD).

Also on the radar is the recent release of the Massachusetts and Rhode Island Port Access Route Study (MARIARS) which was conducted by the

United States Coast Guard. The goal of the study was to enhance navigational safety in the study area (MA/RI wind lease area) by examining existing shipping routes and waterway uses. The MLA is a member of the Responsible Offshore Development Alliance (RODA) and Jarrett Drake, MLA Vice President, is on the RODA Board representing all of you. The RODA comments are also included in this newspaper for you to read and digest.

Offshore wind is not only be a Southern New England matter it is now a Gulf of Maine (GOM) matter and for those of you fishing in the GOM do not delay in getting involved. Stay informed and read these comments. Safe access to your ports is critical and the time is now.

Lastly, please be advised that this issue is a combined issue for April/May as we do not know what next month holds. Please be safe and stay well. I will be sending out weekly emails and MLA members updates regularly. If you do not get the MLA member updates please email me at beth.casoni@lobstemrne.com and ask to be added to the list. With the COVID-19 uncertainties, right whale management rules coming, and the forward progress of offshore wind development here in the US we can not slack off and need to stay the course as the winds of change are here and we are in this together. No one is exempt and United we Stand. With heartfelt regards, Beth Casoni, MLA Director



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TYPE OF MEMBERSHIP	Full Voting \$150 Annual Dues	Associate \$150 Annual Dues	Business \$250 Annual Dues
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Sponsors:

#1 Name_____ [] Delegate [] Regular Member

#2 Name_____ [] Delegate [] Regular Member

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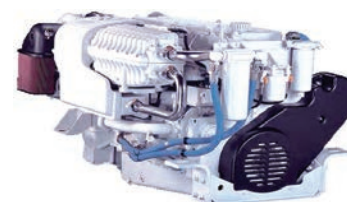
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Massachusetts providing \$10M coronavirus relief fund for small businesses

Gov. Charlie Baker has announced a \$10 million relief fund for Massachusetts small businesses affected by the coronavirus.

The recovery loan fund will provide emergency capital of up to \$75,000 for businesses with fewer than 50 full-time and part-time employees, and is available for nonprofits.

Loans are immediately available and no payments will be due for the first six months.

"This fund should sound familiar to those of you who (remember) the snow emergencies in 2015 or the Merrimack Valley (gas line) disasters in 2018," Baker said.

The Massachusetts Growth Capital Corp. is capitalizing the fund and will administer it, according to Baker.

Business owners can complete applications at empoweringsmallbusiness.org and can email applications to mgcc@masgcc.com with the subject line, "2020 Small Business Recovery Loan Fund."

Baker's update on the state's response to the COVID-19 outbreak comes after a meeting with Massachusetts legislative leaders, including Senate President Karen Spilka and House Speaker Robert DeLeo.

Monday morning, Baker was part of a phone call with President Donald Trump, the president's administration and his fellow governors around the country.

Baker said states were told to make their own efforts to produce and procure ventilators and respirators instead of relying solely on the federal stockpile.

"All efforts should be made by those who are in business to amp up the amount they're manufacturing and assume it would be appropriate for them to not simply rely on whatever's in the stockpile to meet the needs and expectations of the health care community," Baker said.

Baker said the federal government sent 74,000 pieces of protective gear to Massachusetts last week.

On Sunday, Baker ordered a more restrictive public gathering plan, banning all gatherings of 25 or more people. The governor's initial ban was on gatherings of 250 or more people, which was put into place on Friday.

"These gatherings include all community, civic, public, leisure, faith-based events, sporting events

with spectators, concerts, conventions and any similar event or activity that brings together 25 or more people in a single room or a single space at the same time. This includes venues like fitness centers, private clubs and theaters," Baker said.

Baker also banned bars and restaurants from serving food and drinks on site, but will allow them to serve food via takeout and delivery services. The on-site service ban begins Tuesday and is scheduled to last until April 7.

"This order doesn't apply to grocery stores or pharmacies. This is about bars and restaurants and those places that people do not absolutely have to go," Baker said. "I realize these measures are unprecedented, but we're asking our residents to take a deep breath and understand the rationale behind this guidance."

In addition, all K-12 public schools in Massachusetts will close Tuesday and suspend operations for the next three weeks, through April 7.

Massachusetts Bay Transportation Authority General Manager Steve Poflak said the changes are being made based on guidance from public health professionals to protect the health and safety of MBTA employees and riders.

In regards to health care, the state is expanding telehealth services, banning visitors to nursing homes and requiring hospitals to screen visitors and cancel nonemergency procedures. State officials are also working to address a hand sanitizer shortage.

"It's very important everybody have a level head for the next few months," Baker said.

Dr. Monica Bharel, the commissioner of the Massachusetts Department of Public Health, said there is community spread in seven counties in

the state: Berkshire, Essex, Hampden, Norfolk, Middlesex, Suffolk and Worcester.

"Please take seriously the social distancing measures that you heard the governor speak about," Bharel said. "Social distancing is our collective opportunity to influence the course of this illness and flatten the curve. Each of us needs to do our part."

Baker reiterated there are no plans right now to consider a shelter-in-place order for Massachusetts residents.

"We don't believe that's an appropriate decision to be made at this time, given the facts that are on the ground," he said.

Spilka and DeLeo said the Massachusetts State House will be closed to the public until further notice.

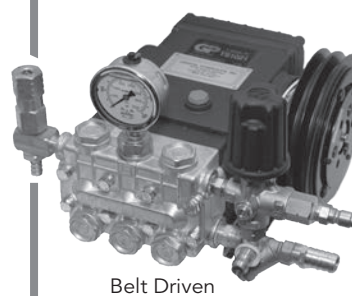
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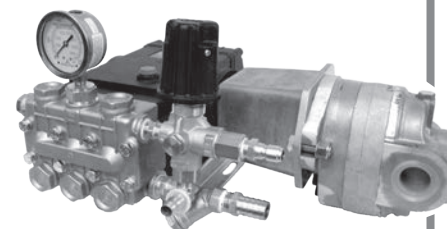
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- Minimum credit score of 575 (no prior or pending charge offs by creditors permitted)

INCOMPLETE APPLICATIONS WILL NOT BE CONSIDERED.

I: BUSINESS INFORMATION

Business name (legal):	Business phone:
Business address (street, apt. #):	City, State, ZIP:
Is this business a franchise? ☐ Yes ☐ No	If yes, name of franchise:
Please provide a brief description of your business:	

How long has your business been in operation? _____	
What was your business revenue for 2019?	\$ _____
What was your business' profit or loss for 2019?	\$ _____ ☐ Profit ☐ Loss
What is the legal entity of your business?	☐ Corporation ☐ LLC ☐ Sole proprietorship ☐ Other
Do you own 100% of the business?	☐ Yes ☐ No
If no, please list owners with more than 20% interest in the company (each have to fill out a separate application):	
Number of employees, including yourself:	Full time: _____ Part time: _____

II: OWNER'S PERSONAL INFORMATION

Full name:	Email address:
Home address (street, apt. #):	City, State, ZIP:
Home phone:	Cell phone:
Date of Birth (month, day, year):	Social Security number/ITIN:
Have you received a loan from MGCC in the past? ☐ Yes ☐ No	Best time to call: ☐ Morning ☐ Afternoon
Annual salary: \$ _____	
Assets Cash: \$ _____	Liabilities Mortgage: \$ _____
Home value: \$ _____	Credit cards: \$ _____
Other Assets _____: \$ _____	Other Debt _____: \$ _____

III: LOAN REQUEST

Amount Requested: \$ _____

Use of Funds/How company has been impaired by COVID-19:

V: MONTHLY EXPENSES

MGCC- Small Business Recovery Loan Fund					
Company:					
Monthly Operating Expenses					
Payroll					
Payroll Taxes					
Insurances					
Rent					
Utilities					
Supplies					
Other					
Total		\$ -			

Other Information Required as Attachments:

- 2018 business and personal tax return

•2020 Interims through 2/29/2020
- Interim 2019 internally prepared financials

•Copy of front and back of Massachusetts driver’s license or government-issued ID

VI: APPLICATION QUESTIONS

Have you ever declared personal or business bankruptcy?

☐ Yes
 ☐ No

If yes, was your bankruptcy discharged or dismissed more than 12 months ago?

☐ Yes
 ☐ No

Have you ever been arrested or convicted of a crime?

☐ Yes
 ☐ No

Are you a U.S. citizen or legal resident?

☐ Yes
 ☐ No

VII: AUTHORIZATION FOR VERIFICATION OF INFORMATION

Please read carefully before signing inquiry

The information contained in this statement is provided to induce MGCC to extend or to continue the extension of credit to the undersigned or to others upon the guarantee of the undersigned. The undersigned acknowledge and understand that MGCC is relying on the information provided herein in deciding to grant or continue credit or to accept a guarantee thereof. Each of the undersigned represents warrants and certifies that the information provided herein is true, correct and complete. Each of the undersigned agrees to notify MGCC immediately and in writing of any change in name, address, or employment and of any material adverse change (1) in any of the information contained in this statement or (2) in the financial condition of any of the undersigned or (3) in the ability of any of the undersigned to perform its (or their) obligations to MGCC. In the absence of such notice or a new and full written statement, this should be considered as a continuing statement and substantially correct. If the undersigned fail to notify MGCC as required above, or if any of the information herein should prove to be inaccurate or incomplete in any material respect, MGCC may declare the indebtedness of the undersigned or the indebtedness guaranteed by the undersigned, as the case may be, immediately due and payable. By signing below, you authorize MGCC to make or have made any credit, employment or investigation inquiry that MGCC determines appropriate for the extension of credit, periodic evaluation of your account or the collection of amounts owed to MGCC. If you ask, you will be informed whether a consumer report was requested, and if a report was requested, you will be informed of the name and address of the consumer reporting agency that furnished the report. Each of the undersigned authorizes MGCC to answer questions about your credit experience with MGCC. As long as any obligation or guarantee of the undersigned to MGCC is outstanding, the undersigned shall supply annually an updated financial statement. This personal financial statement and any other financial or other information that the undersigned give to MGCC shall be MGCC's property.

Owner's Signature: _____

DATE _____

Owner's Signature: _____

For MGCC Use Only:

Date received:	Date business contacted if incomplete:
Approved _____	Declined _____
Date closed:	Date client notified:

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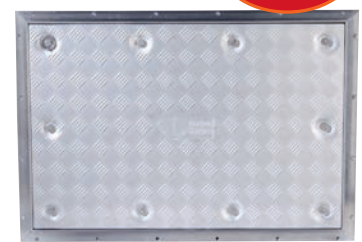
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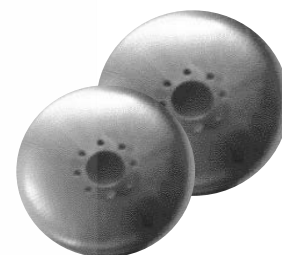
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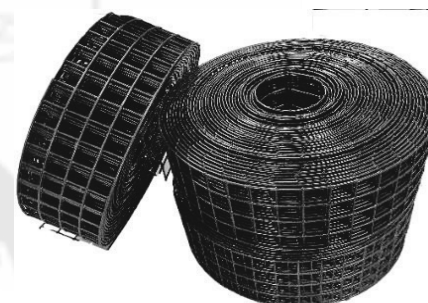
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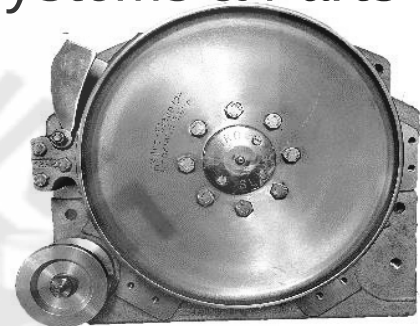
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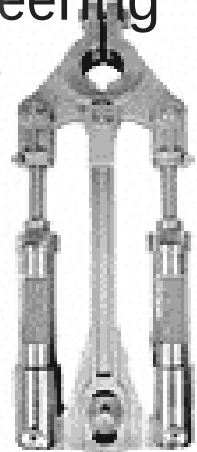


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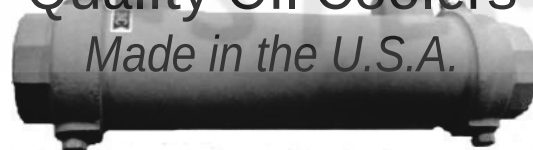
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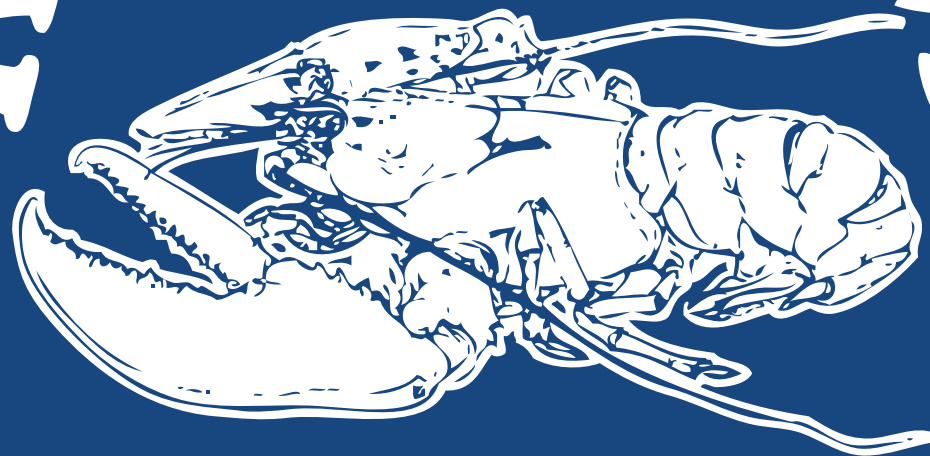
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Continued from page 2

competing mobile gear fisheries for groundfish, sea scallops, and surf clams. DMF is committed to permitting and promoting experimental ropeless fishing in areas and times that do not have a high risk of conflict with other fisheries and do not pose substantial risk of interactions with right whales.

Dispersed Entanglement Risk

Dispersed entanglement risk is a more general risk posed by gear in times and places where whales are not aggregated. The primary way of mitigating this risk is reducing the amount of buoy lines deployed in all fixed gear fisheries. It is our opinion that to effectively reduce buoy lines it is first necessary to establish an accurate baseline of how many buoy lines are being fished. DMF has required all fixed gear fishermen who land in MA ports to report the number of buoy lines they deploy since 2011. This includes federally permitted fishermen as well. We are one of only two jurisdictions in the U.S. that currently requires this. With these data we can look at trends over time and can judge the effectiveness of management measures we have put into place to control fishing effort with empirical data. We do not have to rely solely on models, assumptions, and expert opinion to quantify buoy line numbers. Since 2011 we have observed declining trends in the number of buoy lines deployed in the lobster fishery by Massachusetts based fishermen (Table 1, Figures 1 – 4). This trend is apparent both statewide and in each individual lobster management area (LMA) within Massachusetts coastal waters. Buoy line trends from Massachusetts based LMA3 fishermen have increased in recent years, but the entirety of LMA3 falls outside of our jurisdiction.

Table 1: MA Lobster-pot Fishery, Total maximum buoy lines by LMA and Year, 2011-2018

LMA	2011	2012	2013	2014	2015	2016	2017	2018
LMA1	71,811	67,801	65,220	66,050	61,014	64,191	67,846	60,821
LMA2	10,952	10,828	8,560	7,803	7,333	7,167	7,002	6,188
LMA3	1,299	1,256	1,335	1,549	1,040	1,126	1,228	1,656
OCLMA	18,430	15,027	16,773	15,009	15,037	13,669	13,518	13,474
Total	102,492	94,912	91,888	90,411	84,424	86,153	89,594	82,139

Data Source: MA Supplemental Reports and LMA permit declarations

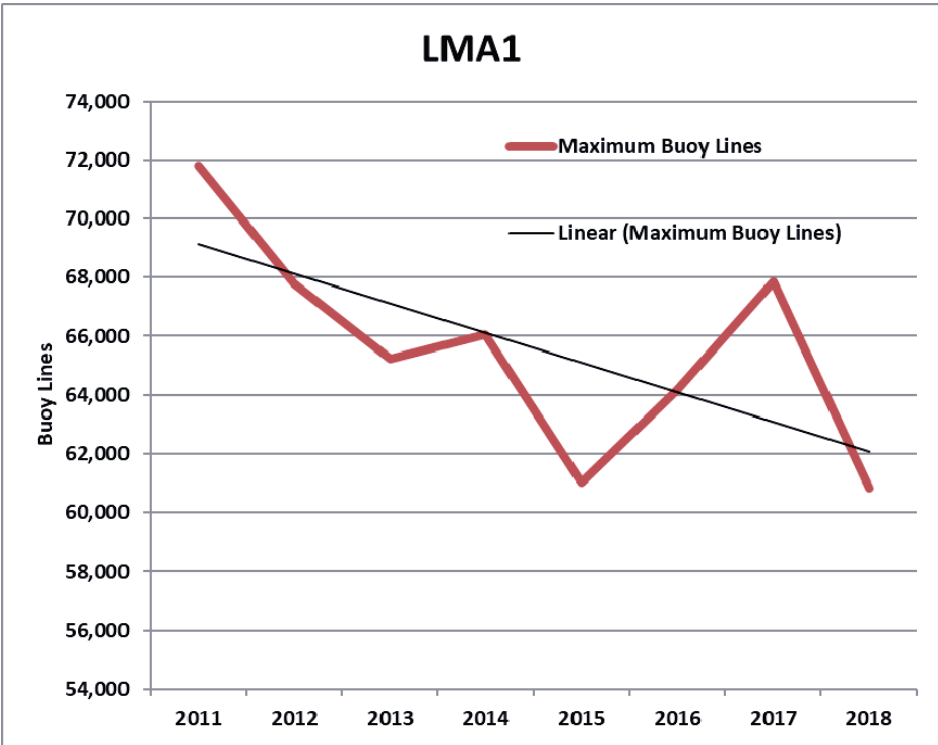


Figure 1. Total maximum buoy lines deployed in LMA 1 – 2011 - 2018

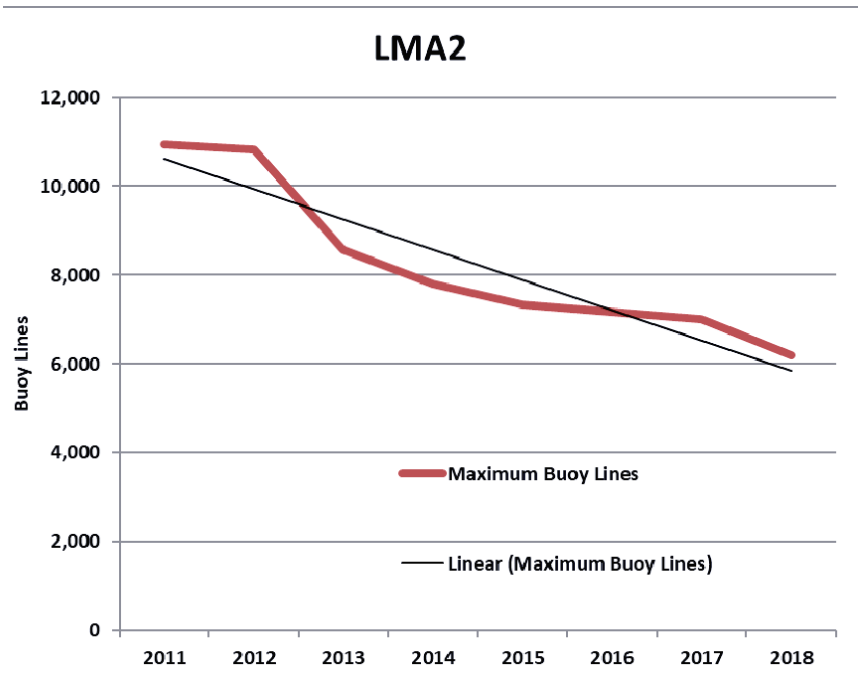


Figure 2. Total maximum buoy lines deployed in LMA 2 – 2011 - 2018

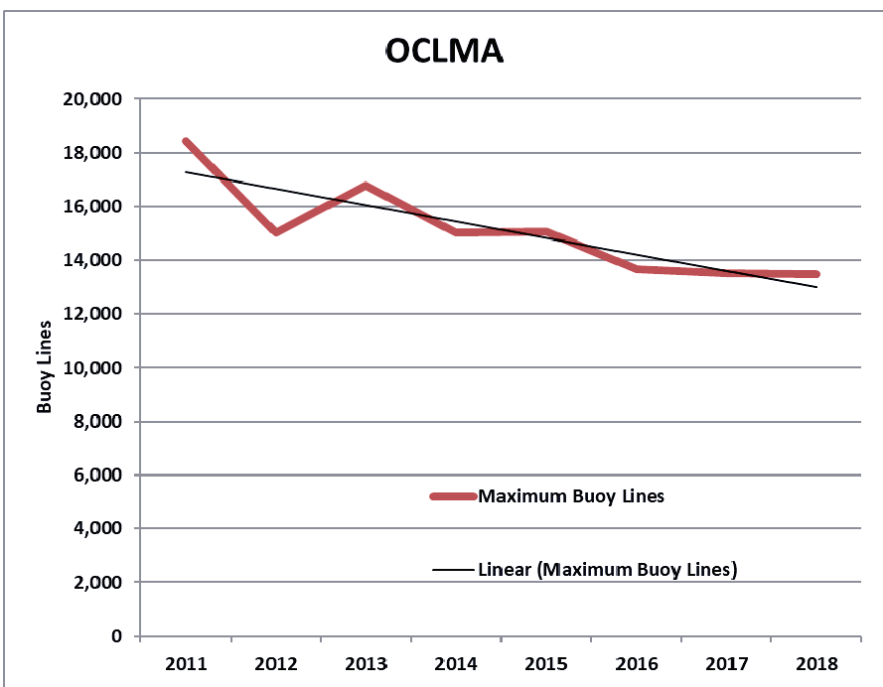


Figure 3. Total maximum buoy lines deployed in LMA OCC – 2011 - 2018

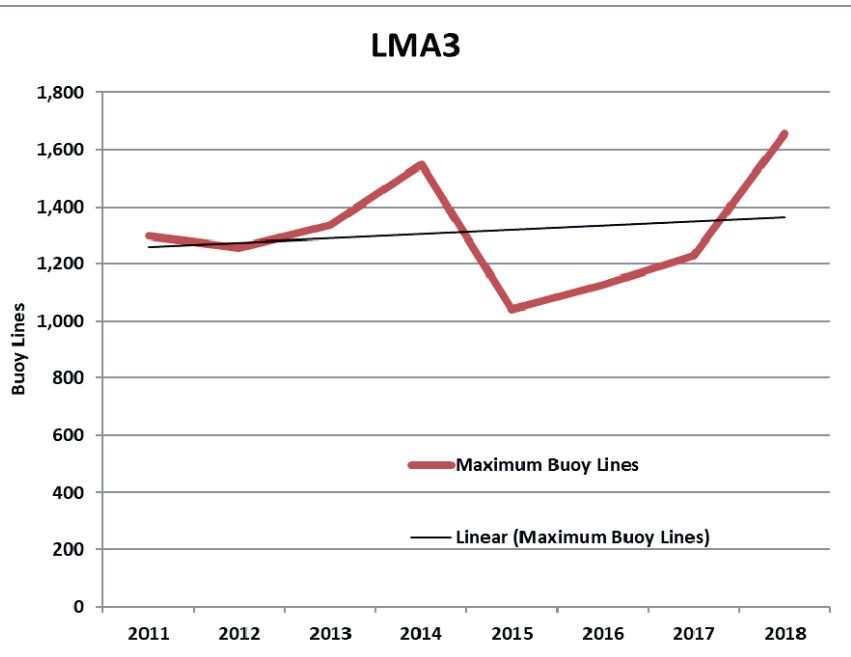


Figure 4. Total maximum buoy lines deployed in LMA 3 – 2011 – 2018

Over the long term we have proactively managed lobster fishing effort in the Massachusetts lobster fishery. We have had a moratorium on the issuance of new coastal lobster fishing permits since 1988 and a moratorium on the issuance of LMA 1 lobster landing permits since 2003. We allow the transfer of active coastal lobster permits (at least 1,000 lbs or 20 sales per year for 4 out of last 5 years) to qualified individuals (1-year full time or equivalent part-time experience in the lobster trap fishery or 2-years full-time or equivalent part-time experience in other commercial fisheries). This has resulted in a long-term reduction in the number of participants and the amount of fishing effort in the MA lobster fishery (Table 2 and 3).

Table 2: MA Lobster-pot Fishery, Active Permit Count by LMA and Year, 2011-2018

LMA	2011	2012	2013	2014	2015	2016	2017	2018*
LMA1	669	650	628	624	627	627	634	651
LMA2	77	78	73	64	71	78	73	71
LMA3	21	26	25	28	25	26	26	27
OCLMA	69	67	71	67	65	61	60	63
Total	836	821	797	783	788	792	793	812

Data Source: MA Trip-level reports and NOAA Fisheries VTRs

*Preliminary, subject to change

Table 3: MA Lobster-pot Fishery, Issued Permit Count by Permit type and Year, 2011-2018

Issued Permits	2011	2012	2013	2014	2015	2016	2017	2018
Coastal Lobster	1,245	1,214	1,188	1,170	1,139	1,116	1,088	1,081
Offshore Lobster	189	175	161	163	159	154	171	156
Seasonal Lobster	98	78	79	76	86	88	96	100
Total	1,532	1,467	1,428	1,409	1,384	1,358	1,355	1,337

Data Source: MA Permitting

database

All Massachusetts fishermen who fish in LMA1, LMA2, and LMAOCC have been subject to a maximum trap limit of 800 since 1992. In addition to this LMAOCC and LMA2 have been subjected to a historically based trap allocation plan in 2004 and 2007 respectively. These plans allocated individual transferable trap allocations based on historical participation and also include a 10% trap tax on any partial trap allocation transfer. NMFS has adopted complimentary measures to these plans and your agency is integral to the administration of these plans. The implementation of the effort capping and effort reduction measures in Massachusetts have greatly contributed to the reduction in traps and the reduction of buoy lines we have observed.

We anticipate that the declining trends in participation, traps, and buoy lines will continue to decline. The median age of fishermen in Massachusetts has steadily increased over time and is rapidly approaching the age at which many fishermen retire or downscale their effort (Figure 5).

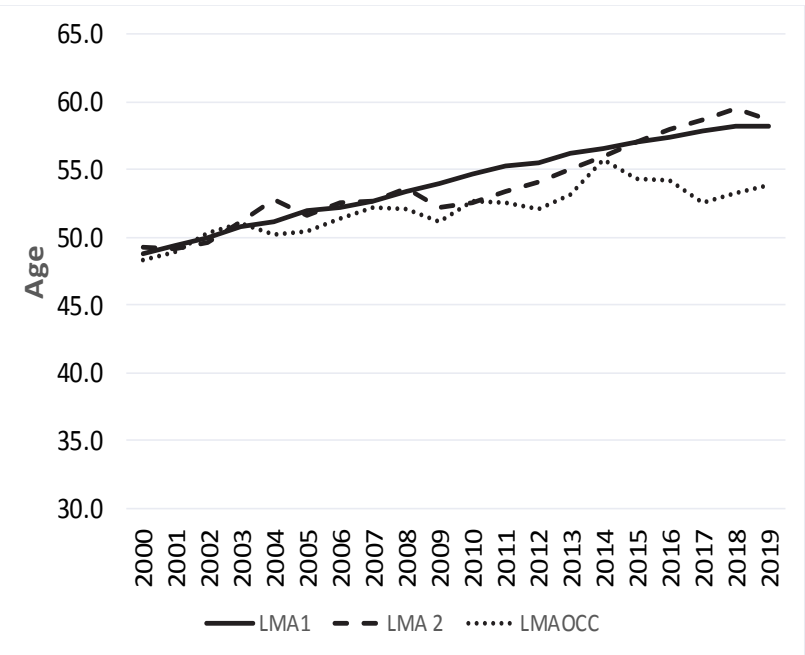


Figure 5. Median age of lobster permit holder in LMA1, LMA2, and LMAOCC – 2000 to 2019.

As these fishermen reach retirement and leave the fishery, we expect that only a portion of their permits will be transferred. In LMA2 and LMAOCC this has and will continue to promote partial trap allocation transfers which are subject to a 10% trap tax. DMF will continue to monitor participation and efforts trends over time and is committed to making necessary adjustments to our management framework to ensure long term stability in participation in our lobster fishery with continued reductions in buoy lines. We believe our track record in this area speaks for itself.

Mitigating for Serious Injury and Mortality and Sub-Lethal Effects

The vast majority of buoy lines fished in Massachusetts state waters are comprised of either 5/16” or 3/8” line. Prior to 2010, these smaller diameter lines were also the most common size removed from entangled right whales. However, in recent years, the majority of rope removed from and seen on right whales has been heavy, large diameter rope not used in the inshore US lobster fishery. This gear is typical of the offshore lobster fishery and the Canadian snow crab fishery. This heavy line also has a higher breaking strength and is most likely to cause severe entanglement injuries and mortality. An analysis of entanglement cases found only severe injuries resulting from higher breaking strength line (Knowlton et al. 2016). That same analysis concluded that the broadscale use of reduced breaking strength ropes (1,700 pounds or less) would reduce the number of life-threatening whale injuries by 72%. Some scientists also believe that sub-lethal effects of minor entanglements are putting additional stress on the already declining right whale population and further suppressing their ability to recover. To address disperse entanglement risk during times when whales are not aggregating, Massachusetts managers and fishermen have been pursuing potential weak rope options for vertical lines. DMF and the Massachusetts Lobstermen’s Association are partnering on a state-wide effort to test weak rope options beginning in summer 2020. In addition, the South Shore Lobstermen’s Association has successfully developed a weak sleeve that can be used on traditional buoy lines to create 1,700-pound weak links. Massachusetts is committed finding effective weak rope solutions to make vertical lines less harmful to right whales while sufficiently safe for the commercial fishermen

The Division of Marine Fisheries proposes the following management strategies:

Acute Entanglement Risk

- *Continue the ongoing MBRA seasonal fixed gear closure from February 1st through April 30th.
- *Dynamic closure extension of the state waters portion of the MBRA using state authority to extend the closure in portions of state waters, as necessary based on up to date whale surveillance.
- *Establishment of a new South of Nantucket Restricted Area (SNRA) fixed gear closure from February 1st through April 30th (Figure 6a and 6b). We propose using utilizing 2017 to 2019 right whale sightings data to evaluate this closure. We also suggest that the size, shape, and timing of this closure be re-evaluated ever three years and modified as necessary.

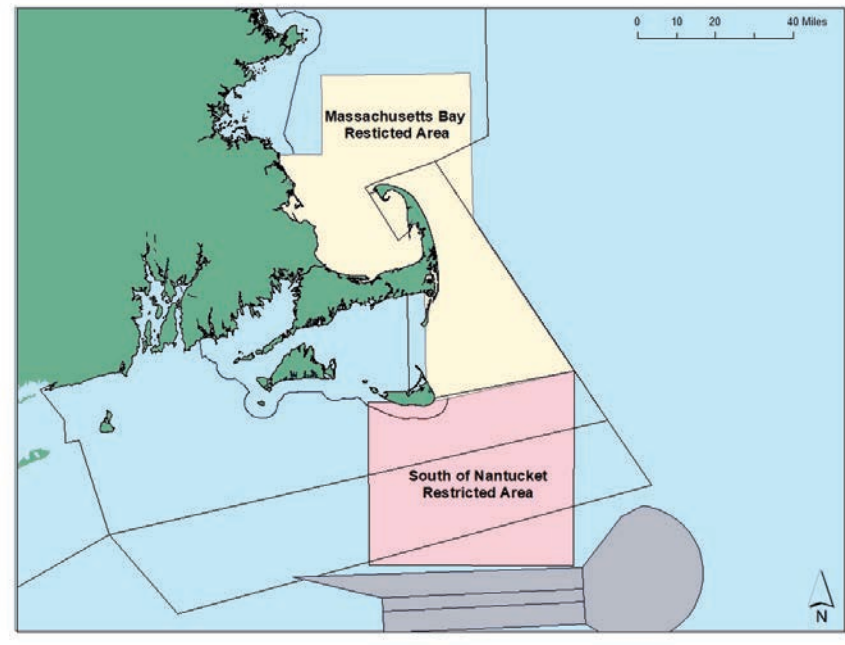


Figure 6a. Map of the Massachusetts Bay Restricted Area and newly proposed South of Nantucket Restricted Area.

Massachusetts Right Whale Conservation Plan 2020

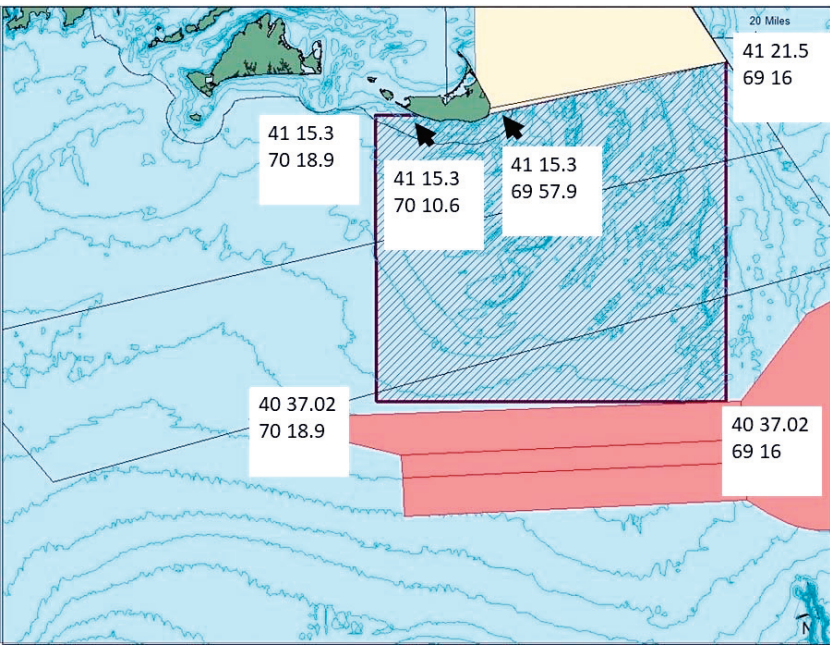


Figure 6b. Close up map of the proposed South of Nantucket Restricted Area with coordinates of each corner.

Dispersed Entanglement Risk

- 1.) Trawling up requirements – We expect these to be applied to all fishermen in the EEZ regardless of state of origin.
 - i. LMA 1
 - 1. 3 to 6 miles - 10 trap per trawl minimum
 - 2. 6 to 12 miles - 15 trap per trawl minimum
 - 3. 12 + miles – 25 traps per trawl
 - ii. LMA 2
 - 1. 3 to 12 miles – 15 trap per trawl minimum
 - 2. 12 + miles – 25 traps per trawl
 - iii. LMA OCC
 - 1. 3 miles to LMA 3 boundary – 15 trap per trawl minimum

Massachusetts Right Whale Conservation Plan 2020

- 2.) Ban on fishing singles on vessels greater than 29’ in all MA LMA’s on permits transferred after 1/1/2020
- 3.) Continue the ongoing 50% trap allocation reduction in LMA2 through 2021
 - i. 2016 – 25% reduction
 - ii. 2017 – 5% reduction
 - iii. 2018 - 5% reduction
 - iv. 2019 – 5% reduction
 - v. 2020 - 5% reduction
 - vi. 2021 - 5% reduction

Mitigation of SIM and Sub-lethal Effects

Requirement for all fishermen in all LMA’s to utilize 1,700 lb. breaking strength rope or an approved 1,700 lb. contrivance as follows;

- i. Coast to 3 miles – One weak contrivance at 50% down buoy line.
- ii. 3 miles to 12 miles – Two weak contrivances in topper at 25% at 50% down.
- iii. 12 miles to the LMA 3 border – One weak contrivance in topper at 35% down.
- iv. Ban on all rope greater than 3/8” diameter in Massachusetts coastal waters.

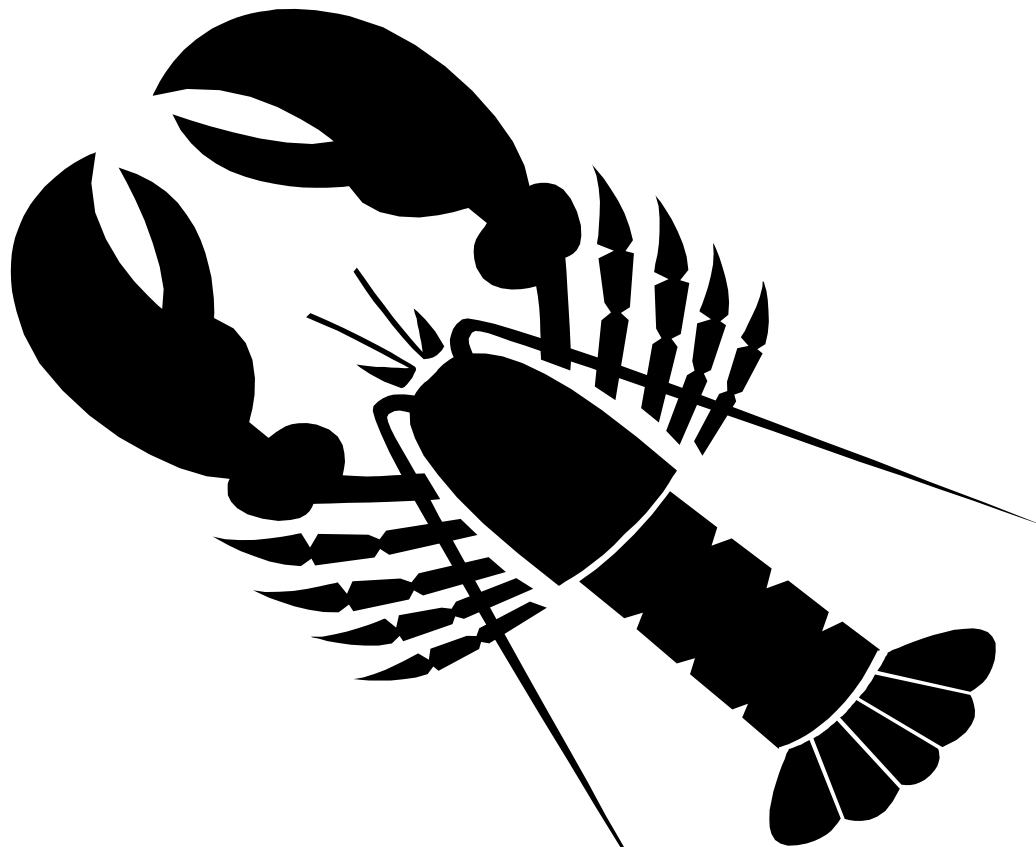
Summary

Based on preliminary evaluations and discussions with NMFS staff we are confident that the measures we have proposed will achieve the required 60% risk reduction for the Massachusetts lobster fishery. We encourage NMFS to utilize a combination of the risk evaluation tool, empirical data, expert opinion, and common sense when evaluating our proposal. We also urge NMFS to utilize more recent right whale sightings data instead of relying solely on a long time series. To date the risk evaluation tool has relied on right whale sightings data from 2010 through 2017. Time series of sightings data make sense for demonstrating historic usage of habitat, however in a rapidly changing environment with documented broadscale changes in right whale distribution, they likely do not accurately reflect current density and distribution of whales. This has the potential to overestimate the effectiveness of risk reduction measures in some areas and underestimate it in others.

In closing, we are committed to developing a comprehensive strategy to reduce the risk of entanglement and serious injury and mortality to North Atlantic right whales that maintains a safe, efficient, and profitable lobster fishery in Massachusetts.

Massachusetts Right Whale Conservation Plan 2020

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Daniel J. McKiernan
Acting Director

Commonwealth of Massachusetts

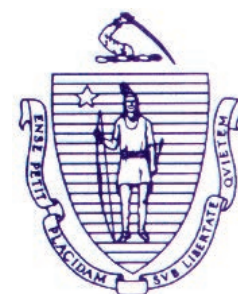
Division of Marine Fisheries

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Lieutenant Governor

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Secretary

Ronald S. Amidon

Commissioner

Mary-Lee King

Deputy Commissioner

March 16, 2020

Marine Fisheries Advisory

DMF Permit Update and Advisory

To assist fishermen and others in the seafood industry during the public health emergency posed by COVID- 19, DMF has made the following accommodations to assist our stakeholders:

Commercial Saltwater Fishing and Seafood Dealer Permits –

In accordance with 322 CMR 7.01(11), any un-renewed 2019 Commercial Fishing and Seafood Dealer permits will be considered valid through April 30, 2020. Permit renewals should be mailed in to DMF and staff will process them as soon as possible.

Any applications for new Commercial Fishing or Seafood Dealer permits should be mailed into the Division of Marine Fisheries, 251 Causeway St. Suite 400, Boston, MA 02114. Staff will process the permit applications as soon as possible.

Staff will continue to work with permit holders who are in the process of transferring their limited entry permits and endorsements, but the processing of these transfer applications may be delayed. We recommend emailing questions and other inquiries to the DMF general email marine.fish@mass.gov.

Recreational Saltwater Fishing Permits –

Recreational anglers and non-commercial lobster fishery participants are urged to purchase these permits through the convenient online application called [MassFishHunt](https://www.ma.wildlifelicense.com/Internetsales/IS/Customer/InternetCustomerSearch) (<https://www.ma.wildlifelicense.com/Internetsales/IS/Customer/InternetCustomerSearch>).

Due to the public health emergency, DMF will not be able to accommodate walk-in transactions for its various permits. Therefore, DMF urges permit applicants to continue to utilize online and mail-in options.



New England Fishery Management Council

FOR IMMEDIATE RELEASE
March 16, 2020

PRESS CONTACT: Janice Plante
(607) 592-4817, jplante@nefmc.org

2020-2021 Monkfish Research Set-Aside Program Supports Novel Tagging, Image Analysis Projects

The 2020-2021 Monkfish Research Set-Aside (RSA) Program will support two innovative projects designed to help researchers and fishery managers better understand the stock structure and movement of monkfish and more easily detect these fish on the seabed, which could be useful in survey applications.

Monkfish is managed jointly by the New England and Mid-Atlantic Fishery Management Councils. The New England Council has the administrative lead. The Monkfish RSA Program was established in [Amendment 2](#) to the Councils’ Monkfish Fishery Management Plan. The amendment specifies that 500 monkfish days-at-sea will be “set aside” annually from the total number of monkfish days allocated to limited access monkfish vessels in order to address research priorities identified by the Councils. The intent is that this research will enhance everyone’s understanding of the monkfish resource and contribute to the body of information that’s available for management decision-making.

The Councils work together with NOAA Fisheries to support research-set aside projects. The way the program is structured, the Councils set the research priorities, and then NOAA Fisheries manages the RSA competition and administers the program.

The New England Council outlined research priorities for 2020-2021 projects during its June 2019 meeting. The list of priorities is available [here](#). The Northeast Fisheries Science Center and the Greater Atlantic Regional Fisheries Office, which are part of NOAA Fisheries, announced the selected projects on [March 11](#).

2020-2021 Monkfish Research Set-Aside Project Selections

Institution (Collaborators)	Project Title	Days-At-Sea Award*
Arizona State University (New England Aquarium)	The Use of Novel Fishery-Independent Tagging Technology to Investigate the Moments and Stock Structure of Adult Monkfish (<i>Lophius americanus</i>) Along the United States East Coast	2020 Award: 400 days-at-sea 2020 Value: \$2,102,582 2021 Award: 399 days-at-sea 2021 Value: \$2,099,397
University of Delaware	Using Deep-Learning Image Analysis to Detect Monkfish from Seabed Imagery – Development and Implementation of a Convolutional Neural Network for Survey Applications	2020 Award: 100 days-at-sea 2020 Value: \$526,300 2021 Award: 101 days-at-sea 2021 Value: \$531,563

** Dollar values are calculated based on an estimated price of \$400 per day-at-sea.*



New England Fishery Management Council

No federal money is involved in this industry-funded program. Instead, the research is conducted collaboratively between fishermen and researchers who work under RSA-awarded days-at-sea. Funds generated from the fish that are harvested and sold are used to cover the cost of research activities and compensate industry partners.

NOAA Fisheries has developed a list of [Frequently Asked Questions](#) about research set-aside programs. The agency addresses questions such as:

- How are projects selected? Who decides which projects are going to be funded?
- How are fishermen included in the review and selection process?
- What are the different stages of the grant competition? What type of financial reporting is required for RSA grant recipients?
- What is RSA compensation fishing? Who decides which vessels get to conduct RSA compensation fishing? How do vessels get involved in RSA compensation fishing? Why does NOAA Fisheries limit the number of vessels that can conduct RSA compensation fishing?
- What are the grant reporting requirements? How does NOAA Fisheries ensure that research results are technically sound before a final report is accepted? How do I get a copy of a final report?
- How effective are RSA programs in supporting research that help manage fisheries?

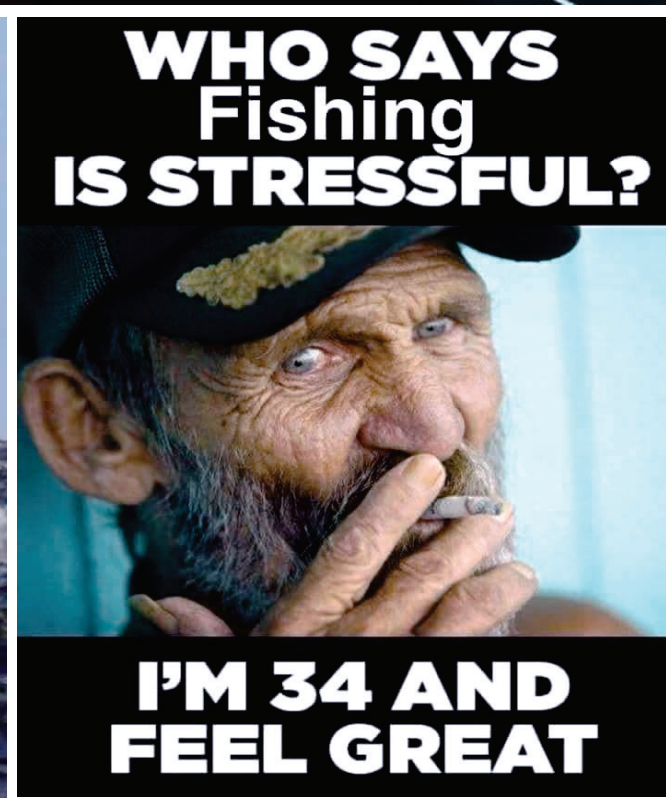
Read the full list of questions and answers [here](#).

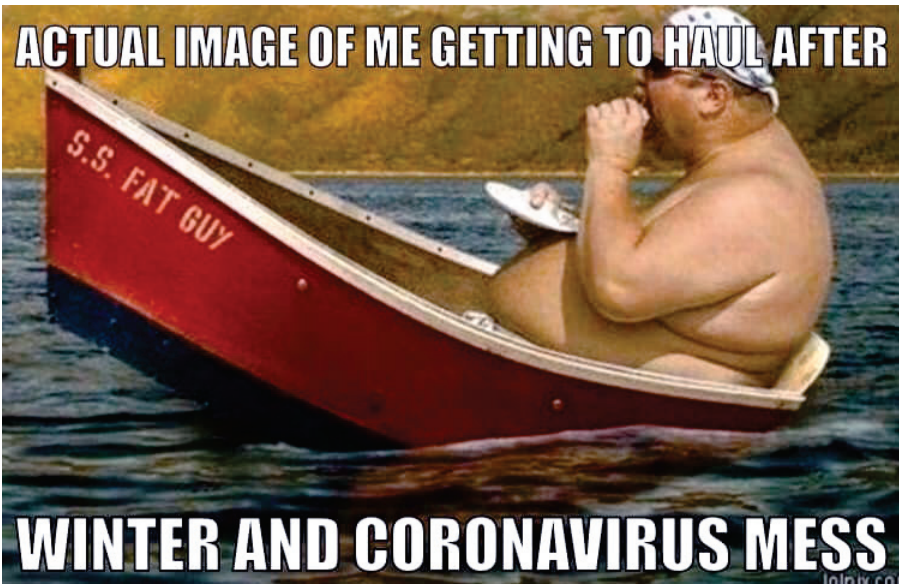
More Information At-A-Glance

- Questions about this year's awards? Contact Ryan Silva, GARFO's Cooperative Research Liaison, at (978) 281-9326, Ryan.Silva@noaa.gov.
- Visit the Northeast Fisheries Science Center's 2020-2021 RSA awards [webpage](#).
- More information about the region's Research Set-Aside Programs can be found [here](#).
- Visit the New England Fishery Management Council's [monkfish webpage](#).



– NOAA Fisheries photo







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Responsible Offshore Development Alliance

March 16, 2020

RADM Andrew J. Tiongson, Commander
U.S. Coast Guard, First Coast Guard District
408 Atlantic Avenue
Boston, MA 02110

Re: Port Access Route Study: The Areas Offshore of Massachusetts and Rhode Island; Docket No. USCG-2019-0131

Dear Commander Tiongson:

The Responsible Offshore Development Alliance (RODA) submits the following comments regarding the United States Coast Guard's (USCG) Notice of Availability of the draft report for its Massachusetts and Rhode Island Port Access Route Study (MARIPARS) (Draft Study).¹

RODA is a membership-based coalition of fishery-dependent companies and associations committed to improving the compatibility of new offshore development with their businesses. Our approximately 170 members are comprised of major fishing community groups, individual vessels, and shoreside dealers operating in federal and state waters of the New England, Mid-Atlantic, and Pacific coasts.

As detailed in previous comments to USCG and other regulatory agencies, RODA has played an ongoing role in the development of recommendations for turbine layout, orientation, and fishing vessel transit needs in wind energy arrays. Our members greatly value their direct work with these agencies—as well as offshore wind developers—in collaborating on mutually satisfactory solutions that will support coexistence among multiple ocean uses. RODA strives to move quickly toward a future in which fishermen can work together with project proponents and federal and state authorities to productively and efficiently approach project design and mitigation in a manner that effectively reduces risk for both industries.

Despite what we believe are shared goals toward collaboration, as offshore wind energy development is an emerging use of the marine environment it is absolutely imperative that early projects do not set precedents that will lead to large-scale displacement and economic harm to existing sustainable fishing practices. RODA thus continues to urge the regulatory authorities including USCG to exercise special care in conducting analyses and gathering input from impacted fishermen in order to ensure that impacts are effectively addressed.

The comments below detail a number of concerns regarding the Draft Study as it stands. First, the analysis places greater priority on potential future uses of the MA/RI Wind Energy Areas (WEA), rather than on existing uses, by only analyzing one layout—that submitted proposed by the wind energy developers. While previously submitted comments, including layouts with potential transit lanes, are noted in the report, the MARIPARS in its current iteration does not give a full investigation

of these alternatives and these must be included in the final report. Second, the analysis fails to substantiate the specific impacts that will befall on fishing vessels due to their unique nature. Understanding more than how a vessel will get from point A to point B is prudent as fishermen are often constrained by distinctive operational and management requirements, such as days at sea, that others transiting through an area do not need to consider. Third, based on an expert peer review, the calculations used to justify the 1x1 nm grid spacing do not follow USCG's own guidance to determine the Closest Point of Approach (CPA) for a fixed hazard, which is the appropriate methodology to use and would require substantially wider spacing for transit routing in a gridded array layout. Fourth, despite noting the presence of studies on radar interference within a WEA, the report fails to review these studies or produce any recommendations for mitigation of such interference. RODA respectfully requests that USCG conducts a more in-depth analysis on these and the other key issues raised herein prior to finalizing the MARIPARS report.

I. USCG Must Provide Impartial Analysis based on Safety, Not Energy Contracts

The docket supporting the Draft Study correctly summarizes the numerous discussions, workshops, and other efforts by RODA and a large number of our members leading up to the initiation of the MARIPARS.² We especially appreciate USCG's inclusion of the original map RODA developed showing traditional fishing vessel transit routes as well as our letter dated January 3, 2020 requesting analysis of dedicated routing corridors, and hereby reiterate that request.

USCG's duty under the goals of MARIPARS is "to enhance navigational safety by examining existing shipping routes and waterway uses."³ Rather than starting from a neutral position focusing on existing uses and safety, however, the Draft Study effectively over-prioritizes potential *future* uses by only analyzing the array layout proposed in the November 1, 2019 letter from the wind energy developers. USCG appears to justify this decision by stating that it "is a cooperating agency in [the Bureau of Ocean Energy Management's (BOEM)] review process and has no legal authority to direct placement or orientation of wind turbines."⁴ Whether or not USCG can dictate the exact placement of wind turbines, it is the nation's foremost maritime safety expert, with the mission "to ensure our Nation's maritime safety, security and stewardship."

RODA and its members have expressed repeatedly that the fragmented offshore wind energy decision making process does not sufficiently include consideration of fishery needs early enough in the planning process to effect meaningful compatibility. This remains a systemic problem. With regard to the New England lease areas, the agencies needed to adopt a structured approach to maintaining fishing vessels' ability to safely transit the area much sooner.

Fragmentation in the planning process led to the execution of the first power purchase agreement (PPA, on July 31, 2018) with a state before any federal or state regulatory effort to identify fishing vessel transit needs *throughout the entirety of the MA/RI lease areas*, despite a high degree of

¹ 85 Fed. Reg. 5222 (Jan. 29, 2020).

² RODA members have informed us that the docket does not include several written communications between fishery representatives and USCG after the November 1, 2019 submission of the developers' joint proposal.

³ 84 Fed. Reg. 11314 (Mar. 26, 2019).

⁴ 85 Fed. Reg. at 5223. Presumably this statement relates to the interpretation of the "One Federal Decision" policy that BOEM has ultimate authority over all decisions regarding offshore wind energy project approvals.



Responsible Offshore Development Alliance

March 16, 2020

RADM Andrew J. Tiongson, Commander
U.S. Coast Guard, First Coast Guard District
408 Atlantic Avenue
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dependence on the area for such activity. As a result, that first project, and then others, were contractually locked in to produce energy in amounts and at prices that became difficult to adjust. Most fishermen who attended transit discussions in the second half of 2018 recognized this difficulty and thus attempted to “negotiate” a solution that would be considerate to the developers with contracts but still maintain safe transit. As noted in the docket, those efforts failed to reach a full consensus, both between fishermen and developers but also amongst the multiple leaseholders.

Fishermen, developers, federal, and state agencies collectively recognized the difficulties associated with defining appropriate transit lanes after PPAs during the RODA transit workshops in late 2018. At that time, BOEM was poised to conduct the auction for the three newer MA/RI leases. It issued a “buyer beware” referencing the ongoing development of transit lanes so that any developer acquiring one of those leases could readily recognize that fishing vessel needs may impact the developers’ ability to fully build out the new areas.⁵

Since that time, states have continued to sign additional PPAs based on the existing and new lease areas, and RODA is troubled that this continues to occur before USCG and other regulatory authorities have completed the development of unbiased transit recommendations. To meet the multiple goals of preserving safe transit, reducing risk to developers and fishermen, meeting power generation and pricing goals, and promoting efficient environmental review, all parties (both public and private) would benefit from procedural changes or federal leadership that prioritizes up-front conflict reduction. Given the absence of such an effort at this time, USCG must conduct its MARIPARS analysis in a way that does not predetermine the outcome based on the results of a flawed process to date.

II. Unique Nature of Fishing Vessel Needs

Commercial fishing vessels have unique operational requirements while in transit, such as the need for sea room due to weather and potential crew fatigue. RODA relies on the expertise of its members when commenting on safety issues for fishing operations. Our members have consistently and adamantly stated that the risk to their safety is too high to operate within a wind energy area. The footprint of a vessel greatly expands, in both length and width, when fishing gear is actively towed and dramatically reduces the maneuverability of the vessel. However, even when gear is not deployed, just as commercial cargo or passenger vessels, fishing vessels have a need for safe transit and established routing.⁶

RODA is aware of comments from service vessel representatives and others supporting the proposition that the uniform 1x1 grid layout proposed by the offshore wind energy developers and contained as the only alternative in the Draft Study would provide sufficient spacing for their operations. These statements cannot be applied to fishing vessels, which are clearly differentiated from service vessels.⁷ As described above, fishing vessels are unique in their operations and cannot

safely transit within a grid layout with the spacing proposed in the Draft Study. In a letter submitted in response to the MARIPARS Notice of Study, BOEM recognized the unique needs of commercial fishing vessels and specifically asked USCG to focus part of its analysis on the specific needs of the commercial fishing industry, including maneuverability when recommending the width of potential transit routes.⁸ The specific needs of the commercial fishing fleet need to be analyzed to ensure the safety of the fleet.

Insufficient spacing between turbines forces fishing vessels to transit around wind energy areas, regardless of the weather conditions. This may result in bottlenecks in zones deemed safe for transit due to vessels being rerouted by the existence of wind energy areas. Insufficient spacing directly increases the risk to fishermen’s safety when transiting home during poor weather conditions, i.e. strong winds and high seas. Fishing vessels may fish until they are forced to return home because of weather; this is distinctly different to service vessels, which cannot service turbines in poor weather conditions and are less likely to be deployed in those conditions.

Service vessels are likely to make shorter trips in order to resolve an issue on a turbine or sub-station, or remain anchored in a work location for longer periods of time, as opposed to fishing vessels that frequently make active trips averaging 5-10 days in length. The nature of these trips, and of the work of fishing, can lead to significant crew fatigue. Fisheries specific regulations can impact fishing vessel transit behavior too; in some fisheries permit holders are allocated a set number of days at sea (DAS) each fishing year and they will land the maximum amount of fish possible when on a DAS before returning to port. If vessels must cut a trip short, or if it takes extra time “on the clock” to navigate around a WEA because it is unsafe to transit through, the vessel owner and crew will realize a direct financial loss. Once a trip has ended, vessels need to return to port as quickly as possible to sell the freshest product. These reasons limit the vessels’ ability to ride out a storm at sea and are why they prefer the most direct route to their port. These important contextual influences, unique to fishing vessels, should be more satisfactorily analyzed in the final MARIPARS report.

III. The Draft Study Has Significant Analytical Deficiencies and Omissions

The Draft Study contains numerous flaws, which prompted our members to request RODA to commission an expert peer review from Dr. Thomas Sproul (Appendix I). They considered this review to be essential given the apparent omissions in the Draft Study, particularly given the importance of safety-at-sea. Dr. Sproul identified a number of shortcomings in the Draft Study analysis, including insufficient application of USCG guidance for Closest Point of Approach (CPA) and errors in the calculation of the minimum spacing between the turbines, in both rows and on the diagonal.

⁵ BOEM, Atlantic Wind Lease Sale 4A - Supplemental Information for Bidders: Potential Vessel Transit Corridors (Dec. 10, 2018) (available at: <https://www.boem.gov/sites/default/files/renewable-energy-program/State-Activities/MA/Vessel-Transit-Corridor-Supplemental-Information-for-Bidders-ATLW-4.pdf>).

⁶ Vessels also have unique spacing requirements to engage in fishing activity within a wind energy array, which is outside the scope of these comments and of the MARIPARS study.

⁷ With regard to service vessels, peer-reviewed literature also suggests the need for, and availability of, scientific modeling regarding collision risk from WTGs, particularly as facilities move farther offshore and into

deeper water. See, e.g., Lijuan Dai et al., *Risk of Collision between Service Vessels and Offshore Wind Turbines*, Reliability Engineering and System Safety 109 (2013), at 18–31.

⁸ Docket No. USCG-2019-0131-0044 (Jun. 4, 2019).



Responsible Offshore Development Alliance

March 16, 2020

RADM Andrew J. Tiongson, Commander
U.S. Coast Guard, First Coast Guard District
408 Atlantic Avenue
Boston, MA 02110

The Draft Study report utilizes a Netherlands study⁹ cited in the UK MGN 543¹⁰ to justify the methodology used in calculations for determining the necessary space for safe passage between turbines. As explained in Dr. Sproul's expert review, it is unclear why the report failed to utilize USCG's own guidance on CPA to determine the recommended width of navigation safety corridors between fixed hazards, such as wind turbines.

Dr. Sproul's expert review outlines the calculations that should be employed using USCG's CPA guidance (Appendix I). The Marine Planning Guidelines in COMDTINST 16003.2B state that under ideal conditions the CPA should be 0.5-1.0 nm from each fixed hazard, and in less than ideal conditions a CPA of 2 nm or more may be necessary.¹¹ In addition to guidance on CPA for both sides of a navigation safety corridor, COMDTINST 16003.2B indicates the corridor should be designed for a sufficient number of vessels to pass. This constitutes a recommendation that there should be some space for routing between the CPA buffers, but does not include a precise method for calculating its width. Utilizing the routing width recommendation from either the Baird report,¹² 0.32 nm, or the methods used in the Draft Study of 23 lengths of the largest vessel anticipated (i.e. 0.74 nm for a 195 ft. vessel),¹³ the absolute minimum spacing should be 1.32 nm (or 1.74 nm) along the diagonal transit corridors through the grid, corresponding to a uniform grid spacing of 1.87 nm (or 2.46 nm). It should be noted that this spacing minimum is based on calculations for ideal conditions, in which fishing vessels do not always operate as noted above. The wider spacing of 1.32 nm on the diagonal would be the only way to allow for a sufficient straightaway course for transit on the diagonal through the WEA.

The alternative spacing method used in the Draft Study (from the "Netherlands study") is not the best methodology to use for the reasons detailed in Dr. Sproul's report. The justification for why USCG used this method fails to mention that: i) USCG guidance for CPA exists; ii) the Draft Study calculations are below the minimum CPA guidance; iii) NVIC 01-19¹⁴ indicates the older MGN 543 was used to develop the USCG Marine Planning Guidelines, and that USCG reviewed the newer MGN 543 and decided *not* to update the guidelines based on the new information it contained; iv) both the MGN 371 and 543 contain recommendations matching the USCG guidance for CPA where turbines should be placed no closer than 0.5 nm from the nearest edge of a shipping route; v) MGN 543 also includes recommendations for 2 nm buffer zones between wind farms and shipping lanes, and for the "20

degree rule" which requires a 5.5 nm corridor width for 15 nm corridors between turbines;¹⁵ and vi) other methods suggesting wider safety margins were not used in the calculations.

While the methodology used was not the most appropriate for determining adequate spacing, the Draft Study's calculations using the "Netherlands study" methodology are also incorrect. They fail to include an UNCLOS Safety Zone (500 m) on each side of the transit lane (clearly shown in the Draft Study Figure 21, pg. 36). Additionally, the calculations assume vessels with a maximum length of 144 ft., which is the documented length of vessels that is available from AIS data. This is considerably less than the vessel length overall considered in developers' Navigational Risk Assessments¹⁶ and the maximum fishing vessel length cited in the Baird report. From these documents, and feedback from our fishing industry members, Dr. Sproul's assumption that the maximum length of fishing vessels transiting the WEA is 195 ft. appears more accurate.

The Draft Study analysis fails to consider the possibility of search-and-rescue (SAR) along diagonal search paths in the WEA. As identified in Dr. Sproul's expert review, the Draft Study recommends "a minimum of 1 nm between turbines along a search path" (p. 29), which will be confined to taking place only along North-South and East-West SAR paths in the Draft Study recommended layout. Consideration of adequate spacing for SAR along a diagonal path is necessary as vessels are intended to transit along this path, which has been indicated in both the Draft Study (pg. 29) and by fishermen who have historically used the area. Furthermore, as indicated in the Draft Study, because predominant wind patterns include summer winds tending to blow from the Southwest and winter winds from the Northwest, a drifting boat in need of SAR would likely need to be searched for along the diagonal. The Draft Study states that normal flight procedures require a turn diameter of 0.8-1.0 nm, and "spacing less than 1 nm will require aircraft to transit the entire length and conduct turns outside of the windfarm" (pg. 29). This poses obvious concerns for fishermen who may require SAR, due to the large contiguous nature of the MA/RI WEA. Expanding the diagonal spacing to 1.0 nm would require 1.41 grid spacing.¹⁷

The Draft Study also did not conduct a modeling analysis to estimate the overall impacts on navigational safety caused by changes in navigational behaviors resulting from WEAs as called for in the 2016 Atlantic Coast Port Access Route Study (ACPARS).¹⁸ The report called for a model that included individual and cumulative effects on the marine transportation system. The ACPARS Working Group (WG) was unable to complete such a model, because of a lack of expertise on the WG, but recognized it was critical in order to "determine if routing measures are appropriate and to evaluate the changes in navigational safety risk resulting from different siting and routing scenarios."¹⁹

Finally, the Draft Study puts the risk on individual vessels by not recommending the use of additional safety measures such as a navigation safety corridor that would account for the cumulative effects of

⁹ Ministry of Infrastructure and the Environment and the Ministry of Economic Affairs of the Netherlands, *Assessment Framework for Defining Safety Distances between Shipping Lanes and Offshore Wind Farms* (2015).

¹⁰ U.K Maritime and Coastguard Agency, *Marine Guidance Note 543, Safety of Navigation: Offshore Renewable Energy Installations (OREIs) - Guidance on UK Navigational Practice, Safety and Emergency Response* (Feb. 2016) [hereinafter "MGN 543"].

¹¹ United States Coast Guard, *Commandant Instruction 16003.2B, Appendix E. Marine Planning to Operate and Maintain the Marine Transportation System (MTS) and Implement National Policy* (June 28, 2019) at E-4.

¹² Baird & Associates, Ltd., *Vessel Navigation Through the Proposed Rhode Island/Massachusetts and Massachusetts Wind Energy Areas* (Oct. 31, 2019) (accompanying the leaseholders' proposal letter).

¹³ See Appendix I, item 5, at 7.

¹⁴ United States Coast Guard, *Navigation and Vessel Inspection Circular 01-19, Guidance on the Coast Guard's Roles and Responsibilities for Offshore Renewable Energy Installations (OREI)* (Aug. 1, 2019).

¹⁵ MGN 543 at 18-20.

¹⁶ Clarendon Hill Consulting, *Vineyard Wind Revised Navigational Safety Risk Assessment* (July 24, 2018), Table 4.0-2 at 46; Deepwater Wind South Fork, LLC, *South Fork Wind Farm Navigational Safety Risk Assessment* (Oct. 2, 2018), Table 5-2 at 71.

¹⁷ See Appendix I.

¹⁸ USCG, *Atlantic Coast Port Access Route Summary: Final Report* (July 2015), Docket No. USCG-2011-0351.

¹⁹ *Id.* at i.



Responsible Offshore Development Alliance

March 16, 2020

RADM Andrew J. Tiongson, Commander
U.S. Coast Guard, First Coast Guard District
408 Atlantic Avenue
Boston, MA 02110

multiple vessels transiting through a wind energy area. The ACPARS planning guidelines discuss the use of navigation safety corridors as these may reduce risk to all sizes of vessels, which may be forced to transit closer to each other than they would in open ocean conditions. Environmental conditions dictate the path a vessel takes, which can lead to the actual path taken by a vessel differing from its intended path. Vessel operators must be vigilant to notice if this occurs in a WEA with minimal spacing in order to reduce the risk of collision with turbines or other vessels.

IV. The Draft Study Fails to Consider Concerns Associated with Radar Interference

Wind turbines interfere with radar systems, including those used aboard fishing vessels. The Notice of Study for the MARIPARS report stated that its goal is “to enhance navigational safety by examining existing shipping routes and waterway uses” and that, through the study, USCG would “identify anticipated impacts to navigation that may be experienced by mariners intending to transit in, around and through the study area which includes the MA/RI Wind Energy Area (MA/RI WEA).”²⁰ In order to accomplish the stated study goals, USCG must carefully consider navigation impacts that may result from degradation of marine radar. This effort must incorporate all relevant existing information and new analyses if appropriate, as USCG has done for previous project reviews.

As described below, USCG, BOEM, and other agencies performed dedicated analyses regarding interference to marine radar associated with the Cape Wind project. RODA requests a similar analysis be conducted for the current generation projects. It would not be adequate to solely rely on these studies for the recent slate of proposed MA/RI projects, since the technology and footprint contemplated for the projects have advanced considerably in the past decade.

a. *The Draft Study Arbitrarily Ignores Available Information*

USCG did not exercise due diligence in considering navigation hazards posed by radar interference in the draft study, despite the abundance of available information. The subject is only addressed in Section III: “Vessel Traffic and Characteristics Analysis, Subsection H. Radar,” (p. 26). The relevant text reads, in its entirety:

The potential for interference with marine radar is site specific and depends on many factors including, but not limited to, turbine size, array layouts, number of turbines, construction material(s), and the types of vessels impacted. A number of commenters mentioned the potential for radar interference by [wind turbine generators (WTG)]. We reviewed several studies that address correlations between wind turbines and marine radar interference. To date, the USCG is not aware of an authoritative scientific study that confirms or refutes the concern that WTGs will degrade marine radar.

The final sentence is misleading. It has been extensively confirmed that WTGs will degrade marine radar, but exact effects on all vessels and the resulting level of safety risk have not been precisely quantified. Given the continued improvement in radar technology and wide variability in marine radars in use by commercial fishermen, quantifying exact effects is a difficult task. However, exact quantification does not preclude consideration of a safety standard given that effects are known to

exist. The various navigational risk assessments completed by offshore wind energy leaseholders to date similarly omit consideration of this important issue.

b. *Wind Turbines’ Interference with Radar Functioning Is Well Documented*

The Draft Study’s assertions that minimal or conflicting information exists to support a conclusion that wind turbines degrade marine radar directly conflict with USCG’s previous statements as well as other readily available information.

1. *Information on Turbine Effects to Government Radar Is Readily Available*

More than a decade of information available to the U.S. government shows that wind turbines significantly interfere with radar functioning. The Department of Defense has repeatedly raised concerns that “radar clutter (i.e., false targets) from the wind turbine blades would seriously impair the agency’s ability to detect, monitor, and safely conduct air operations.”²¹ In response to early concerns over land- and sea-based turbines, the National Security Council requested the White House Office of Science and Technology Policy conduct an internal study in 2011 that found WTGs interfered with radar used for national defense, security, aviation, and weather forecasting “by creating clutter, reducing detection sensitivity, obscuring potential targets, and scattering target returns. These effects on radar systems tend to inhibit target detection, generate false targets, interfere with target tracking, and impede critical weather forecasts.”²²

This type of information is also well known in Europe. Several countries including the United Kingdom, Germany, Netherlands, Austria and Norway require developers to obtain special permission for wind facilities to ensure that radar conflicts are minimized. Each has also established “protection zones” ranging from 5–50 nm around military radar systems.²³

More recently, in 2014, an interagency Memorandum of Understanding created the Wind Turbine Radar Interference Working Group (WTRIM), which strives to identify and develop recommendations for newer, more effective mitigation solutions.²⁴ While that group does not appear to have investigated WTG impacts to marine vessel radar systems, it is unclear why the U.S. government would invest significant attention and resources to only certain aspects of radar interference and not others. The WTRIM’s expertise and that of other federal agency subject matter experts should be included to apply lessons learned from these related efforts to the MARIPARS study. All traditional radar systems—and those that are used on most fishing vessels—operate using fundamentally the same technology; there is no reason for fishing vessels’ navigation systems to be exempt.

²¹ A brief history of the federal government’s awareness of this issue is included in U.S. Department of Energy, Federal Interagency Wind Turbine Radar Interference Mitigation Strategy (Jan. 2016), at 2 (*available at* <https://www.energy.gov/sites/prod/files/2016/06/f32/Federal-Interagency-Wind-Turbine-Radar-Interference-Mitigation-Strategy-02092016rev.pdf>).

²² Sandia National Laboratories, *IFT&E Industry Report: Wind Turbine-Radar Interference Test Summary*, SAND2014-19003 (Sept. 2014) (*available at* https://www.energy.gov/sites/prod/files/2014/10/f18/IFTE%20Industry%20Report_FINAL.pdf).

²³ United States Department of Defense, *Report to the Congressional Defense Committees: The Effect of Windmill Farms on Military Readiness* (2006) (*available at* <http://www.defense.gov/pubs/pdfs/windfarmreport.pdf>).

²⁴ U.S. Department of Energy, Federal Interagency Wind Turbine Radar Interference Mitigation Strategy (Jan. 2016), at 2 (*available at* <https://www.energy.gov/sites/prod/files/2016/06/f32/Federal-Interagency-Wind-Turbine-Radar-Interference-Mitigation-Strategy-02092016rev.pdf>) [hereinafter WTRIM].

²⁰ 84 Fed. Reg. 11314 (Mar. 26, 2019).



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2. Marine Radar on Fishing Vessels

In addition to the large body of information showing that WTGs impact all radar systems, USCG has previously documented that wind turbines specifically negatively impact marine radar. In 2008, the Marine Minerals Service (MMS, which preceded BOEM as the lead federal agency for offshore wind energy permitting) reviewed the proposed Cape Wind project. During the course of that review two conflicting reports addressing this issue were submitted to MMS, which then referred the matter to USCG for consideration.²⁵ To resolve discrepancies between the two studies, USCG commissioned a third report from Technology Services Corporation (TSC), titled "Report of the Effect on Radar Interference of the Proposed Cape Wind Project." In a memorandum to MMS, Captain Perry of USCG concurred with the findings of the TSC report and recommended based on its conclusions that MMS characterize the Cape Wind project's impacts to marine radar as "moderate."²⁶ Specifically, the TSC report found that the project's implementation would significantly adversely impact the ability of a vessel inside or outside of the wind energy facility to detect a vessel within that facility by radar.²⁷ These findings were fully upheld by a later study prepared for the U.S. Department of Energy, with USCG support, that surveyed and simulated electromagnetic and acoustical challenges to sea surface, subsurface, and airborne electronic systems posed by offshore wind turbines.²⁸

Additional studies exist beyond those previously analyzed by USCG. In but one example, a widely circulated study investigated effects to marine radar of the Kentish Flats wind project in the United Kingdom.²⁹ It was funded by offshore wind developers and is one of the few field-based studies of which RODA is aware that specifically investigated marine radar interference as it would apply to fishing vessels. That study confirmed some of the findings of the TSC study: "effects were generated on marine radar systems in the vicinity of wind farms," which included interference to the ability of radar operators outside of a wind energy array to identify small vessels within the array. The study also noted some valuable potential mitigation strategies. However, it was limited in that observations occurred only from about 1 nm outside of a wind energy facility and expressly warned it should not be used to draw conclusions outside of its specific context of "collision avoidance in pilotage waters from about 1 nm outside a single small wind farm, not to general navigation close to or within other

anticipated wind farm developments." It is also important to note that the significantly smaller size of turbines in that project compared to those proposed for the MA/RI WEAs.

The realization of these concerns has been documented through informational exchanges with European fishermen who operate in areas where turbines have been installed, including this widely-shared photograph taken by one of RODA's members aboard a fishing vessel in the U.K.'s Thanet Offshore Wind Farm:



This image, and other experiences of RODA members, confirms the degradation of marine radar within wind arrays.

3. In the MA/RI WEAs

Specific to the proposed MA/RI WEAs, and through scoping for the MARIPARS study, fishermen and others have repeatedly raised questions regarding the potential for reduced radar capabilities.³⁰ USCG has previously recognized these concerns both on and off the record, and its findings in the Draft Study represent a dramatic and perplexing departure from prior statements.³¹

Of primary concern in this area are the enormous differences in size and scope of both the proposed WTGs for these projects (potentially exceeding 18 MW by the time build-out is complete) and the 1400 square mile footprint of the contiguous lease areas, which is by far the largest in the world. In light of clear documentation of larger turbines producing greater radar impacts, and of expanding difficulties in identifying vessels the further they are located within a wind energy array, why would the New England lease areas not merit, at a minimum, the level of desktop analysis USCG performed for the Cape Wind project?

²⁵ Memorandum from Capt. R.J. Perry, USCG Sector SENE, to COMDT (DCO) regarding Assessment of Potential Impacts to Marine Radar from the Nantucket Sound Wind Facility as Proposed by Cape Wind, LLC (Dec. 30, 2008), at 2.

²⁶ Per the impact categories submitted by MMS at the time of the review, a "moderate" impact was defined as

- a. Impacts to the affected activity or community are unavoidable, and
- b. Proper mitigation would reduce impacts substantially during the life of the proposed action, or
- c. The affected activity or community would have to adjust somewhat to account for disruptions due to impacts of the proposed action, or
- d. Once the impacting agent is eliminated, the affected activity or community would return to a condition with no measurable effects from the proposed action if proper remedial action is taken." *Id.*

²⁷ USCG, *Assessment of Potential Impacts to Marine Radar as It Relates to Marine Navigation Safety from the Nantucket Sound Wind Facility as Proposed by Cape Wind, LLC* (Jan. 2009), at 11. (available at <https://www.boem.gov/sites/default/files/renewable-energy-program/Studies/USCGRADARfindingsandrecommendationsFINAL.pdf>).

²⁸ Hao Ling et al., *Assessment of Offshore Wind Farm Effects on Sea Surface, Subsurface and Airborne Electronic Systems*, Final Report DE-EE0005380 (Sept. 2013), at 19.

²⁹ MARICO Marine, *Investigation of Technical and Operational Effects on Marine Radar Close to Kentish Flats Offshore Wind Farm* (Apr. 2007).

³⁰ See, e.g., Letter from RODA to USCG regarding Port Access Route Study, Docket No. USCG-2019-0131-0029 (May 28, 2019); see also Letter from Zdenka Willis, Director, U.S. IOOS Program Office, to Andrew Krueger, Project Coordinator, BOEM regarding Commercial Leasing for Wind Power Development on the Outer Continental Shelf Offshore New York (July 14, 2014) ("There are eleven [11] high frequency [HF] radars in New Jersey, New York, and Rhode Island that will be negatively impacted to some degree or another by wind turbines situated offshore Long Island . . . NOS and the U.S. IOOS Program would like to work with BOEM to seek to minimize and if possible eliminate impacts to HF radar operations").

³¹ See Letter from Chris Glander, USCG to Brian Krevor, BOEM regarding Vineyard Wind Draft Environmental Impact Statement (March 1, 2019), at 4 ("We recognize that potential impacts to marine radar continues to be of concern to mariners. Radar impacts are a function of numerous issues including turbine height and size, proximity to other towers, weather, atmospheric, shipboard radar quality, radar operator proficiency, target size and number, etc.").



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The Draft Study also fails to identify effects on airborne radar, which may be substantial. These could affect SAR operations because the gain reduction necessary to remove clutter will obscure small targets, i.e., small craft, which tend to produce a weaker return signal. Small craft are more difficult to identify by airborne radar; for example in the QinetiQ 2004 study using British lifeboats, vessels of about 35-40 ft in length were identified as such (lengths were not given in the study, but are apparent from the photos).³² As part of the MARIPARS study, a data request was made to the RI Department of Environmental Management, which provided median vessel lengths for the four primary gear types operating out of Rhode Island (scallop dredge, pots and traps, gillnet, and otter trawl), using VTR data from 2013-2017. The median length of a vessel using gillnets was 39.0 ft and the median length of a vessel using pots and/or traps was 42.2 ft. Thus, essentially half of all gillnet and lobster/crab fishermen out of Rhode Island are likely small enough craft to experience difficulty with radar detection.

c. The Final MARIPARS Must Include Mitigation Strategies to Reduce Safety Risk

There appears to be broad agreement among experts that turbine placement is a key strategy to minimize radar interference. It is simply inconceivable that USCG would issue recommendations for turbine spacing in the MA/RI lease areas without any probing analysis of the extent of, and possible mitigation measures for, this interference as part of its comprehensive safety analysis. Therefore, this issue needs to be considered in any spacing recommendations and advance of project layout finalization. Several studies, including many of those referenced above, propose mitigation strategies that could be considered to reduce the impacts of marine radar degradation from turbines.

The WTRIM in its 2016 report stated that methods to minimize interaction to radar from turbines include, *inter alia*, "spacing the specific locations of wind turbines farther apart to enable detection of targets between them," clearly stating that "[t]he most important and straightforward approach [to minimizing wind turbine radar interference] is the proper siting of wind facilities on the landscape as well as 'micro siting' of wind turbines within planned facilities."³³ A separate study funded in part by developer Iberdrola similarly concluded "[d]ue to the great influence of both wind farm layout and dimensions of wind turbines have on the potential impact, associations related to radar services are demanding case by case impact studies before a wind farm is installed".³⁴

Changes in turbine spacing are not the only possible mitigation measure. The Final Environmental Impact Statement for Cape Wind project notes this:

Several mitigation techniques can potentially be employed to reduce the effect of the turbines on radar. Radar mitigation techniques could include reducing the radar cross section (RCS) of the turbines and increasing the RCS of the vessels within or near the wind farm.³⁵

Although the FEIS goes on to conclude that increasing the RCS of vessels within the wind farm would enhance radar visibility but not noticeability and therefore only have a minor effect on navigational safety, other strategies may prove more effective. These could include turbine blades specially engineered to reduce a turbine's radar signature, upgrades to vessels' radar systems, use of AIS transponders, cell towers, radar operator training, and others.

d. The Final MARIPARS Report Must Consider Whether Spacing Adjustments Must Be Made to Mitigate Radar Interference

Some of the available literature contains measurements that may be useful in translating radar interference into turbine spacing or safe vessel distance guidelines. The Cape Wind FEIS indicates that secondary reflections (aka "false targets") cannot occur closer than the second circle of turbines due to physics.³⁶ In the case of a uniform grid, there are two scenarios to consider. For travel along the horizontal and vertical lines of orientation, the worst-case second circle occurs when a vessel passes between two turbines and has a radius of 1.12 times the uniform grid spacing distance (e.g., 1 nm). For travel along the diagonals, the worst-case second circle occurs when a vessel passes closest to a single turbine on either side and has a radius of 0.79 times the uniform grid spacing distance. Navigation safety analyses with respect to radar interference could consider these distances, in combination with projections of vessel speed, reaction time, and probability of detection to assess the resulting safety impacts. For a vessel among turbines that are tightly spaced, reduced radar range may be needed. However, at least one study shows that at a radar range of 0.75 nm, multiple turbines within that range can create enough clutter as to make small craft difficult to detect or notice.³⁷

Other reports may also be informative. For example, the Netherlands study cited in the Draft Study recommends a safe distance of 0.8 nm with respect to radar. Moreover, the USCG CPA guidelines suggest 0.5-1.0 nm minimum distance between vessels and fixed or moving hazards and evidence supports that small craft cannot be distinguished from turbine radar signatures until they are at least 385 m (0.21 nm) away from a turbine.³⁸ If the CPA was considered to be the minimum safe distance that a passing vessel could be surprised by appearance of a small craft, then this suggests a safe passing distance of 0.71-1.21 nm from the nearest turbine. Applied to travel along the diagonals, these distances would correspond to diagonal corridor widths of 1.42-2.42 nm, or uniform grid spacing of 2.01-3.42 nm.

V. The Draft Study Omits Other Issues Raised in Public Comment

Several important issues that fishermen have repeatedly raised throughout the development process for the MA/RI wind projects are absent from the Draft Study. As directed by COMDTINST 16003.2B, Appendix D, a PARS study must "collect and analyze data and other information on:... (k) economic (costs and benefits) effects and impacts; and (l) any additional information that arises as a result of public comments."³⁹ We have identified and described some of the additional concerns held by fishermen that the Draft Study fails to consider below.

³² U.K. Maritime and Coastguard Agency, *Results of the Electromagnetic Investigations and Assessments of Marine Radar, Communications and Positioning Systems Undertaken at the North Hoyle Wind Farm by QinetiQ* (Nov. 15, 2004), at 40.

³³ WTRIM at 3.

³⁴ Itziar Angulo et al., *Impact analysis of wind farms on telecommunication services*, Renewable and Sustainable Energy Reviews 32 (2014), at 91.

³⁵ U.S. Department of the Interior, *Cape Wind Energy Project Environmental Impact Statement* (Jan. 2009), at 27.

³⁶ USCG 2008 at 27.

³⁷ Eli Brookner, *Deleterious Effects of Cape Cod Proposed Wind Farm on Marine Radars* (March 2008), at 11-12.

³⁸ QinetiQ (2004).

³⁹ United States Coast Guard, *Commandant Instruction 16003.2B, Appendix D. Marine Planning to Operate and Maintain the Marine Transportation System (MTS) and Implement National Policy* (June 28, 2019), at D-3.



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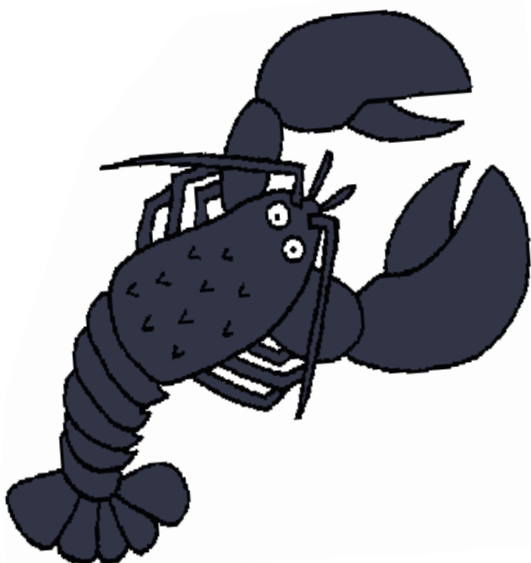
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insufficient understanding of these impacts; and 4) the Draft Study misses an opportunity to develop a robust science-based procedure for future decisions. RODA urges USCG to conduct a complete economic cost and benefit analysis for all layouts considered for inclusion in the final version of the MARIPARS.

c. Icing

An additional concern held by the fishing industry not analyzed in the Draft Study, is the effect that ice buildup on turbine blades may have on safe passage around a turbine. Ice buildup on the turbines is a known issue for wind energy areas in cold climates. Rime icing is a major concern for wind turbines,⁴² and once temperatures rise, the ice is likely to dislodge from the blades. Layouts with minimal spacing between turbines increase the risk to transiting vessels from falling ice. The distance from the turbine that the ice can travel varies, dependent on whether the blades are active or locked down. Some of the additional factors affecting the distance travelled include the rotor diameter, hub height, size of the ice fragment, rotor position, and wind speed.⁴³ Although the cited studies do not suggest icefall is likely to occur outside of the 500 m buffer zone, the size and height of the turbines, in addition to unique geographic features in New England, indicate that USCG should conclusively ensure that recommended turbine spacing maintains a high level of safety, year round, for vessels operating in proximity to wind energy areas.

Thank you for your consideration of these comments and our request for additional analysis regarding these important issues. Please do not hesitate to reach out if we can provide additional information or clarification.

Sincerely,

Annie Hawkins, Executive Director

Fiona Hogan, Research Director

Lane Johnston, Programs Manager
Responsible Offshore Development Alliance

APPENDIX I

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COMMENTS RE: MARIPARS DRAFT OF 01/22/2020: Docket USCG-2019-0131

March 16, 2020

Mr. Michael Emerson, Director
Marine Transportation Systems (CG-SPW)
U.S. Coast Guard, Stop 7501
Washington, DC 20593-751
By email: Michael.D.Emerson@uscg.mil
Also submitted as public comment to Docket USCG-2019-0131 via [regulations.gov](https://www.regulations.gov)

Dear Mr. Emerson:

Enclosed is my review of The Areas Offshore of Massachusetts and Rhode Island Port Access Route Study, January 22, 2020 DRAFT (USCG-2019-0131), the "MARIPARS Draft." Preparation of my review was coordinated and funded by the Responsible Offshore Development Alliance (RODA) following direct requests by multiple members of fishing communities. My review was funded through direct contributions from the fishing industry.

The MARIPARS Draft recommends "the MA/RI WEA's turbine layout be developed along a standard and uniform grid pattern with at least three lines of orientation and standard spacing" (p. 2) because this layout would "satisfactorily and expeditiously provide safe navigation and continuity of USCG missions" (p. 34). The MARIPARS Draft explicitly considers the importance of travel along the diagonals of the grid layout in recommending three lines of orientation (pp. 32, 36, 37), and states that "a standard array with adequate spacing between WTGs... would create multiple navigation safety corridors through the WEA" (p. 34).

Clearly, spacing between the turbines must be adequate for safe passage. The MARIPARS Draft recommends corridors for transit and fishing that are 1 NM wide in the North-South and East-West directions and 0.6 – 0.8 NM wide in the Northwest-Southeast direction. In other words, a 1 NM uniform grid is recommended, and the resulting diagonal corridor width of 0.7 NM (due to simple geometry) is deemed acceptable. This recommendation exactly matches

⁴² Colin Morgan *et al.*, *Assessment of Safety Risks Arising from Wind Turbine Icing*, EWEC-CONFERENCE (Oct. 1997), at 141-144.

⁴³ Henry Seifert *et al.*, *Risk Analysis of Ice Throw from Wind Turbines*, in Proceedings of BOREAS VI April 9-11 2004, Pyhatunturi, Finland (2004) (available at <http://web1.msue.msu.edu/cdnr/icethrowseifertb.pdf>).



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APRIL / MAY 2020

the “uniform 1x1 wind turbine layout” proposal submitted by the New England offshore wind leaseholders on November 1, 2019.

The MARIPARS Draft grid spacing recommendations are insufficient for safety, and they appear to be made in error. On the critical issue of spacing along the diagonals, the MARIPARS Draft departs from USCG guidance and uses an alternative method without adequate justification. Further, only through apparent computation errors in this alternative method do the MARIPARS recommendations match the leaseholders’ 1x1 grid proposal.

By my calculations, the absolute minimum spacing should be 1.32 NM along the diagonal transit corridors through the grid, corresponding to uniform grid spacing of 1.87 NM. These calculations use the minimum Closest Point of Approach (CPA) guidance from the USCG (for ideal conditions) combined with the Baird methodology (accompanying the leaseholders’ proposal) for calculating the necessary width of a route (between CPA buffers on either side), allowing for vessels to pass and maneuver. This minimum spacing calculation should not be construed as a recommendation – it does not account for many risk factors that are present, nor does it recognize alternative guidelines recommending additional safety margin. It is my opinion that substantially wider spacing is necessary for safety.

Scope of Analysis

My analysis is confined to addressing spacing within a uniform grid layout. This analysis does not evaluate nor endorse a uniform grid layout versus alternatives with additional routing measures or wider navigation safety corridors, such as those requested in the public comment letters of the Massachusetts Lobstermen’s Association (May 20, 2019) and Seafreeze Ltd. (May 24, 2019), and in the letters after the public comment period by the RI Commercial Fisheries Center (December 18, 2019) and by RODA (January 3, 2020) in response to the leaseholders’ proposal. It is obvious even to a casual observer that a 1x1 grid layout carries additional navigation risk after removal of 4 NM-wide navigation corridors (aka “transit lanes”).

Findings

1. The MARIPARS Draft defines navigational safety corridors (Appendix B, p. 1) consistently with USCG Marine Planning Guidelines in COMDTINST 16003.2B,¹ Appendix E:

“Navigation Safety Corridors identify the amount of area necessary for vessels to safely transit along a route under all situations. These corridors are not considered routing measures by the Coast Guard or the International Maritime Organization (IMO), but are a tool to delineate areas where no offshore development should be considered.”

Since vessels are allowed, and expected, to pass through all straight-line routes between turbines in the uniform grid proposed to cover the WEA, any such route must be considered a navigation safety corridor: the space between turbines in the uniform grid is clearly both a route where vessels must transit safely and an area where no offshore development should be considered. This fact is confirmed by the explicit statement in the MARIPARS Draft that the uniform grid layout “would create multiple navigation safety corridors through the WEA” (p. 34).

2. Despite this acknowledgment, the Draft fails to mention that the Marine Planning Guidelines contained in COMDTINST 16003.2B, Appendix E, also explicitly provide guidance related to the width of navigation safety corridors: the Closest Point of Approach (CPA) is “the safe distance at which a vessel can pass a fixed or moving hazard” (p. E-4). Depending on the assessment of risk factors, COMDTINST 16003.2B, Appendix E indicates a CPA of 0.5 – 1.0 NM may be acceptable under ideal conditions, but that under less ideal conditions a CPA of 2 NM or more may be necessary (p. E-4).

When identifying a straight-line route as a navigation safety corridor with hazards present on both sides, the CPA guidelines must apply on both sides of any vessel transiting the route after accounting for the necessary room for vessels to pass and

¹ COMDTINST 16003.2B is United States Coast Guard Commandant Instruction 16003.2B, Marine Planning to Operate and Maintain the Marine Transportation System (MTS) and Implement National Policy (June 28, 2019). This document is cited as guidance on page 1 of the MARIPARS Draft.



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maneuver. This means the minimum CPA distance of 0.5 NM to either side of a route corresponds to a diagonal navigation safety corridor width of 1.0 NM *plus the width of the route itself*. Even if the width of the route itself is assumed to be zero, a 0.5 NM CPA corresponds to a 1.0 NM diagonal corridor width, which corresponds to 1.41 NM uniform grid spacing due to geometry.

Thus, the leaseholders' 1 NM uniform grid proposal conflicts with the barest minimum USCG guidance for CPA with respect to travel along the diagonals. This conflict is neither mentioned nor evaluated in the MARIPRAS Draft, which makes spacing recommendations exactly conforming to the leaseholders' proposal.

The Marine Planning Guidelines in COMDTINST 16003.2B, Appendix E do not give exact prescriptions for the width of the route between CPA buffers on either side, other than indicating that space should be available for "a minimum of two vessels passing abeam of one another and other vessel operations in the area" (p. E-4). Using the calculations in the Baird report accompanying the leaseholders' proposal, the route width would be 0.32 NM. Using the calculation in the MARIPARS Draft (Fig. 21, p. 36), the route width would be 23 lengths of the largest vessel anticipated. Based on submissions by the leaseholders, I use a length of 195 ft (see item 5 on page 7 below) for the calculation, giving a route width of 0.74 NM.

Depending on the minimum CPA distance being 0.5 NM or 1 NM, these estimated route widths correspond to minimum diagonal navigation corridor widths of 1.32 – 2.32 NM using the Baird methodology, or 1.74 – 2.74 NM using the MARIPARS methodology. Applied to the uniform grid layout advocated in the MARIPARS Draft, these diagonal navigation corridor widths correspond to minimum grid spacing of 1.87 – 3.28 NM using the Baird methodology or 2.46 – 3.87 NM using the MARIPARS methodology. In a general setting where less than ideal conditions are anticipated and a 2 NM CPA is required, diagonal corridor widths are 4.32 NM or 4.74 NM, corresponding to minimum grid spacing of 6.11 NM or 6.70 NM.

While these distances may seem large in contrast to the leaseholders' proposal, some context is important. Well-known recommendations from Europe (mentioned below)

make either the same "route width + 4 NM" recommendation as derived here for the diagonals, or encourage use of a "20-degree rule" which would require navigation corridors substantially wider than 6.70 NM along the longest transections of the WEA. Similar widths have previously been requested by members of the commercial fishing industry and by RODA.

4. An alternative spacing analysis method, found in the "Netherlands study," is applied to the diagonals in the MARIPARS Draft. Justification for this alternative analysis is provided in Section IV.D. paragraphs 2-4 (p. 34). The justification can be summarized as: i) there is no standard methodology for spacing (par. 2), ii) comments requested we review the British guidance document MGN 543² (par. 3), and iii) MGN 543 refers to a Netherlands study... which seems to provide a reasonable approach (par. 4). The justification offered in the MARIPARS Draft is wholly inadequate and fails to mention:

- i) the existence of USCG guidance for CPA;
- ii) that the resulting calculations from the spacing analysis method chosen result in recommendations below the minimum CPA guidance;
- iii) that NVIC 01-19³ explicitly states that MGN 371 was used in developing the USCG Marine Planning Guidelines, and that "The USCG views MGN 543 as a simplification of its predecessor, MGN 371, and does not deem it necessary or prudent to revise our [Marine Planning] Guidelines" (NVIC 01-19, Enclosure 3, p.1, note 2);
- iv) the presence in both MGN 371 and 543 of recommendations exactly matching USCG guidance for CPA (MGN 371 p. 13, MGN 543 p. 21), in

² MGN 543 is the United Kingdom Maritime and Coastguard Agency (MCA) Marine Guidance Note 543, Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues (January, 2016). MGN 371 is its predecessor, issued August, 2008.
³ NVIC 01-19 is United States Coast Guard Navigation and Vessel Inspection Circular 01-19, Guidance on the Coast Guard's Roles and Responsibilities for Offshore Renewable Energy Installations (OREI) (August 1, 2019). From page 1 of the MARIPARS Draft: "NVIC 01-19 providing [sic] further guidance to USCG units and external stakeholders on factors the USCG considers when evaluating risk in OREI."



Responsible Offshore Development Alliance

March 16, 2020

RADM Andrew J. Tiongson, Commander
U.S. Coast Guard, First Coast Guard District
408 Atlantic Avenue
Boston, MA 02110

which both use the term "intolerable" to describe turbines being placed closer than ½ NM from the nearest edge of a shipping route;

- v) the presence in MGN 543 of other recommendations that suggest even wider safety margins, such as a 2 NM buffer zone between wind farms and shipping lanes (p. 19), corresponding to a 4+ NM total navigation corridor width, or the "20-degree rule" (pp. 18-20) which is related to the concept of Cross Track Error in COMDTINST 16003.2B Appendix E (pp. E-3, E-4).⁴ The 20-degree rule would require a 5.5 NM corridor width for 15 NM corridors between turbines, and proportionally wider corridors for longer rows of turbines (a 65 NM long diagonal corridor is contemplated in the MARIPARS Draft, p. 32, Fig. 20); and,
- vi) why, among the new recommendations in MGN 543 (not previously found in MGN 371), only the method suggesting the narrowest safety margin was chosen for use in the MARIPARS Draft and all other methods suggesting wider safety margins were discarded without consideration.

5. The alternative spacing analysis contains computation errors. Corrected computations give diagonal corridor widths of 1.28 NM, and resulting grid spacing of 1.81 NM.

According to the MARIPARS draft, the calculation is based on the so-called "Netherlands study,"⁵ which clearly indicates the 500 m (0.270 NM) UNCLOS Safety Zone applies on each side of the route if vessels are passing between turbines (Appendix 6, p. 62). The calculation error is prominently shown in MARIPARS Figure 21 (p. 36), in which the missing UNCLOS Safety Zone for the second row of turbines breaks the symmetry of the colored bands in the Figure.

⁴ Like Closest Point of Approach, concern about Cross Track Error is omitted from the MARIPARS Draft.

⁵ "White Paper on Offshore Wind Energy, Appendix 6: Assessment Framework for Defining Safety Distances between Shipping Lanes and Offshore Wind Farms," published by The Ministry of Infrastructure and the Environment and the Ministry of Economic Affairs of the Netherlands. September, 2014.

The recommendations of the alternative spacing analysis depend critically on the maximum length of vessels contemplated to navigate through the developed wind energy area (WEA). The MARIPARS Draft assumes these vessels to be only fishing vessels, and reports their maximum length as 144 ft. With respect to maximum vessel length, there appear to be additional data sources *submitted by the developers* documenting the presence of significantly larger vessels. These submissions were apparently ignored despite BOEM's explicit request that the Coast Guard "consider vessel traffic analyses already submitted through developer NSRAs (Navigation Safety Risk Assessments)." (MARIPARS Draft Appendix E, Synopsis of Comments, p. 4).

The Revised Navigational Risk Assessment (July 24, 2018) submitted by Vineyard Wind as an appendix to their Construction and Operations Plan (COP) reported maximum vessel lengths in the 2016-2017 AIS data to be 197 ft for commercial fishing and 184 ft for recreational vessels (Table 4.0-2, p. 46). In the Baird report accompanying the leaseholders' proposal of a 1x1 uniform grid layout, the maximum fishing vessel length for 2017-2018 was listed at 195 ft for commercial fishing and 300 ft for recreational vessels (Table 2.1, p. 3). Finally, the South Fork Wind Farm (SFWF) Navigational Risk Assessment (COP Appendix X, October 2, 2018) submitted by Orsted reported that 37% of all vessels transiting in the vicinity of the SFWF had a length overall (LOA) of 164-246 ft (Table 5-2, p. 71) using July 2016 to July 2017 data from the AIS (p. 22).

To summarize the above, it appears 195 ft is a more appropriate assumption for the maximum length of vessels transiting the WEA than the 144 ft length assumed in the MARIPARS Draft. A length of 195 ft is still conservative given that it is not known whether larger vessels, including recreational, will continue to pass through the MA/RI Wind Energy Area (WEA) after development. A recent study commissioned by NYSERDA⁶ notes "it is generally not prudent for large commercial vessels (>70 meters [220 feet] in length) to transit between [turbines]," (p. 46) but makes no such observation for smaller vessels. As a more extreme example, the leaseholders contend that vessels up to 400 ft may still safely pass through the turbine array.

⁶ New York State Offshore Wind Master Plan Shipping and Navigation Study, NYSERDA Report 17-25q. December 2017. Prepared for New York State Energy Research and Development Authority by The Renewables Consulting Group, LLC, New York, NY.



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Applying the estimate of 195 ft to the calculation in MARIPARS Section IV.D. (23 vessel lengths) results in an additional 1,173 ft (0.193 NM) needed for the required minimum width of the route, between the UNCLOS safety zones. The full calculation generates required diagonal corridor widths of 1.28 NM, or uniform grid spacing of 1.81 NM. This width is still narrower than the recommendation from USCG CPA guidance.

6. The MARIPARS analysis fails to consider the possibility of search-and-rescue (SAR) along diagonal search paths. Doing so would result in a diagonal spacing requirement of 1.0 NM, corresponding to 1.41 NM grid spacing. It is not discussed that this requirement would exceed the spacing in the leaseholders' proposal. The following considerations emphasize the potential importance of search along the grid diagonals, and/or 1 NM spacing along the diagonals.

i) As discussed above, both the MARIPARS Draft and the leaseholders' proposal indicates vessels are intended to transit along the diagonals of the WEA. In their seminal text, Soza (1996)⁷ defines a "line datum" as including "situations where a vessel or aircraft was known or suspected to have experienced distress while traveling along a straight line connecting two points" (pp. 3-6, 3-7). In this event the highest probability search area will be parallel to that line (pp. 3-7, 3-8). If vessels are transiting along the diagonal corridors of the uniform grid layout, there will inevitably be SAR incidents with a line datum along a diagonal, where a search pattern of sweeps along parallel diagonals may be optimal. The MARIPARS Draft recommends "a minimum of 1 NM between turbines along a search path" (p. 29), based on visual flight rules for helicopters. Unfortunately, this requirement renders diagonal search paths infeasible in the leaseholders' proposed 1x1 grid and suggests the need for a minimum of 1 NM spacing along the diagonal navigation corridors of the grid, or 1.41 NM uniform grid spacing.

ii) The MARIPARS Draft indicates that disabled vessels are the most common SAR incident in the WEA (p. 27), while Soza states "survivors adrift on the ocean

move with the winds and currents" (p. 1-5, among many). The MARIPARS Draft indicates that predominant wind patterns in the area include summer winds tending to blow from the Southwest and stronger winter winds tending to blow from the Northwest (p. 26). While this observation also suggests high probability search along the diagonals, this is likely to be a secondary concern relative to the line datum scenario above: drift motion over periods of "one to a few days" may be somewhat predictable, but is usually quite random over shorter time scales (Soza 1996, p. 5-3). Depending on the density of the grid layout, it may be quite unlikely that a disabled vessel could be adrift for an extended period without encountering a WTG platform.

iii) The MARIPARS Draft notes that "in the event visibility significantly decreases while a helicopter is already operating within the WEA, space may be needed greater than 1 NM in order for a flight crew to safely exit the wind farm area," but acknowledges it is not known how much additional space is needed (p. 30). Implementing 1 NM spacing along the diagonals would allow for both diagonal search and for aircraft facing deteriorating conditions to optionally exit the WEA using the larger 1.41 NM grid spacing available along the horizontal and vertical lines of orientation.

Summary

I would like to conclude my letter with a brief overview of my findings.

On the critical issue of spacing to either side of a navigation corridor, the MARIPARS Draft departs from USCG Closest Point of Approach (CPA) guidance without explanation. In place of the guidance, an alternative spacing analysis method is used without proper justification, and computation errors are made within the alternative method. To make matters worse, the alternative method was previously evaluated and discarded by the USCG.

Though they would not require as much spacing as CPA guidance, search-and-rescue considerations with respect to a search path along the grid diagonals are also ignored.

⁷ The Theory of Search, A Simplified Explanation. Soza & Company, Ltd. and Office of Search and Rescue, U.S. Coast Guard. October 1996.



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Altogether, these shortcomings serve to understate the minimum required grid spacing for safe transit by 46% or more by my calculations. Such a severe miscalculation can have dramatic consequences for safe navigation in the MA/RI Wind Energy Area. Furthermore, correcting any one of the oversights identified would lead to recommended grid spacing that is substantially wider than that proposed by the leaseholders. Instead, the MARIPARS Draft fails to discuss any potentially conflicting guidance and issues a recommendation exactly matching the leaseholders' proposal.

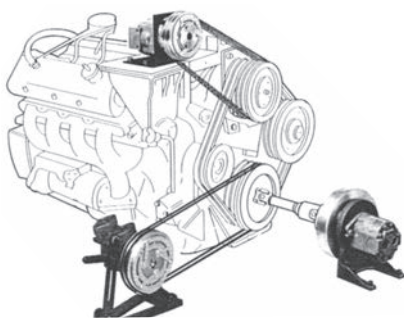
After reading my review, I believe you will agree that the MARIPARS Draft cannot and should not be approved as final until substantial corrections are made.

Sincerely,

Thomas Sproul, Ph.D.

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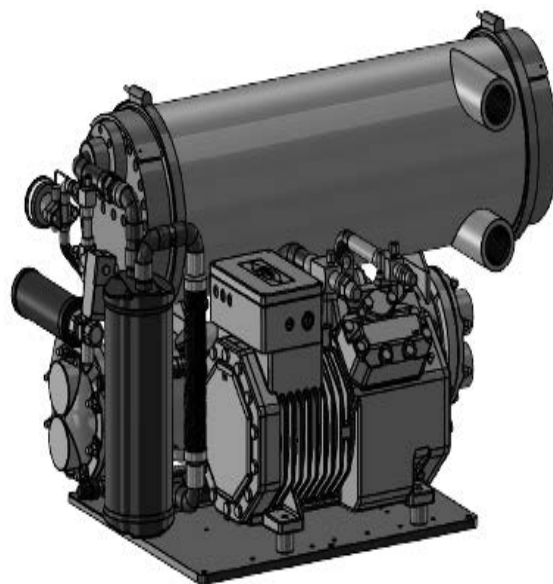




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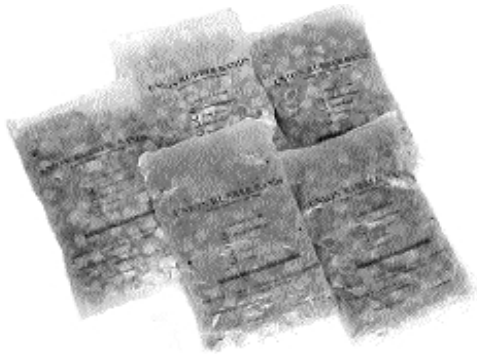
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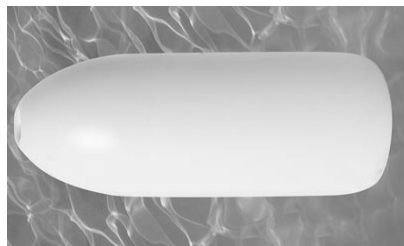
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M.L.A. Public

"Lobster – Education-101 Ongoing Lecturers"



On February 20 & 21, MLA Sec-Treasurer, Dave Casoni and the M.L.A. Executive Board member, Steve Holler gave presentations on "A Day in the Life of a Lobsterman", at the New Bedford Fishing Heritage Museum in New Bedford. Both Steve and Dave (each did one day) spoke to the public –adults and school vacation kids– about what it is like to be a lobsterman.

The ever-present M.L.A. information materials were handed out and explained. Volunteers from the Heritage Museum worked with the kids on making lobster

puppets and using the M.L.A. coloring book. A very creative "lobster fact" cartoon was on the screen full time (created by the museum) the event was run on the same days the New Bedford Whaling Museum was doing school vacation events and lectures.

If you have not been to the Heritage Museum it is worth the time to drop in and see the various displays and information gathered. You may have something you could contribute –knowledge –experience or material.



Cape Cod Community College -4C's

On February 27th, 2020 –Sec-Treasurer, Dave Casoni, gave a talk to a group of adults on our industry. Never for a lack of something to say or talk about, Dave, educated thirty individuals about the industry. The usual M.L.A. handouts are always a big hit!



This group (one of many) enrolls in extension classes offered to the public, has its major interest in seafood, not a bad topic! Dave explained that they may hear and learn about other fisheries, but now they would learn about the "King of Seafood"!

As usual with most presentations, there are many questions and hopefully most are answered. Over the years a lot of questions range from what kind of bait do we use to "have you ever been bitten by a lobster"? "Or do you see any sharks"? Most lobstermen get this type of questions from people they meet. A lot of questions from today's public ask about climate conditions, warming oceans, acid rain, plastic dumping, pollution, whales and general ocean conditions. All tough to answer from both a scientific position and commercial fisherman's position. We hope we satisfy most!

If ever you are asked to give a talk, remember, M.L.A. has a lot of handouts that answer a lot of questions! Don't hesitate to ask for it! And let us know how it went!



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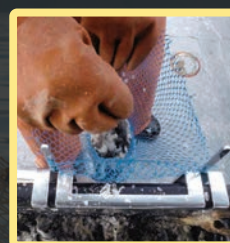
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Massachusetts Lobstermen's Association, Inc.

8 Otis Place ~ Scituate, MA 02066
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March 13, 2020

Good afternoon MLA Members and supporters,

After many weeks of monitoring the evolving situation around the coronavirus (COVID-19) and evaluating the full spectrum of feedback we received numerous calls and emails, we, the Massachusetts Lobstermen's Association (MLA), have decided that the 57th Massachusetts Lobstermen's Association's Annual Weekend & Industry Trade Show 2020 will not take place as scheduled in April.

Earlier this week, Massachusetts Governor Baker declared a State of Emergency for the next 30 days and we are going to follow his lead to ensure the health and safety of our members, staff, exhibitors and attendees alike. The highly contagious COVID-19 has ballooned from 7 cases on January 2, 2020 to 124,500 on March 11, 2020 with no end in sight and we do not want to delay in making our decision so that you can plan accordingly.

Registered vendors, please look for important follow up communications from the MLA that will include logistical details resulting from this cancelation. The MLA is committed to do what is right by its vendors by offering the choice of rolling over exhibit space payment to the future 2021 event or a refund. More details will come to the vendors separately.

Registered guests, the Resort and Conference Center at Hyannis will automatically be issuing a full refund for room packages and deposits to anyone who has already made reservations for the MLA Annual Weekend & Industry Trade Show 2020.

We appreciate hearing from all of you. The volume of calls and emails we have been receiving is very high and we are doing our best to get back to you in a timely manner. Thank you for your patience and understanding.

Sincerely,

Arthur "Sooky" Sawyer

MLA, President

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AD#22 (2/20) FOR SALE-Federal/State Lobster Permit/Outer Cape -Call Jeff 508-240-1634

AD#23 (2/20) FOR SALE- MA Coastal Lobster Permit Area 1 800 trap allocation asking \$30,000. Or B/O John Moran 401-525-0981

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AD#28 (2/20) HELP WANTED-Sternman/Commercial Lobsterman Position. Experience Preferred but not necessary. If dedicated, honest and hardworking I will train. Must have own transportation/Drug Free. Gloucester Robert @ 617-417-9630

AD#29 (3/20) WANTED- Used sink/float rope. Looking for large amounts of USED sink and float rope; 3/8" up to 3/4". Willing to pay up to \$100 per full truck load. Will travel to your location to pick it up. Please contact John at (617) 275-3744, or email Lobstermats@gmail.com

AD#30 (3/20) Looking to buy- Small refrigerated truck or slide in body for a pickup truck. Call Ted at 843-267-3473 or respond to mrfish@mrfish.com with pictures please.

ASMFC Spring Meeting Canceled

The Atlantic States Marine Fisheries Commission (ASMFC) leadership has decided to cancel its Spring Meeting (May 4- 7) in Arlington, VA. This action is taken in response to the recommendation of the Centers for Disease Control and Prevention to cancel or postpone gatherings of 50 people or more over the next eight weeks because of the coronavirus pandemic. As a result of the cancellation, our August Meeting may be extended to 4 days (August 3-6) and Commissioners and proxies are being asked to keep their calendars open for May 5 & 6 in order to conduct any necessary Commission or species management board business via webinars/conference calls. The details of any scheduled webinars will be announced as they become available.



The Commission's Spring Meeting agenda included a number of important issues. Commission staff, Board Chairs, and Commission leadership will develop plans to address each of the agenda items. It is anticipated that non-urgent items will be postponed until the Summer Meeting, and items that require action prior to August will either be handled through via webinars/conference calls or through email votes, depending on stakeholder interest. Conducting meetings via webinars/conference calls makes public comment somewhat difficult. Therefore, members of the public are encouraged to submit comments in advance of a meeting to be included in briefing materials.

PRESS CONTACT, TINA BERGER, 703.842.0740

RECIPE of the MONTH



Lobster Roll Bruschetta

Photo: Jennifer Causey

Active Time

25 Mins

Total Time

25 Mins

Yield

Serves 20 (serving size: 1 slice)

By **CALLIE NASH**

June 2017

Beautiful, delicious, and impressive—this recipe can be the star appetizer at your next gathering. It includes all the flavors you love in a lobster roll, delivered in a fresher format. Though we love the sweet flavor of lobster in this appetizer, you can easily substitute 1/2 pound of shrimp with delicious results. Don't be tempted to skip the quick-pickled shallot rings—their tang and crunch are a real plus. To get a head start, you can pickle the shallots and prepare the lobster topping a day ahead; bring elements to room temperature before serving.

Ingredients

1/2 cup red wine vinegar

1 tablespoon granulated sugar

1/8 teaspoon crushed red pepper

2 small shallots, peeled and cut into thin rings

2 (8-oz.) lobster tails

Cooking spray

1 (10-oz.) French bread baguette, split lengthwise

1/4 cup extra-virgin olive oil

2 cups chopped tomato (about 2 large tomatoes)

1 1/2 tablespoons fresh lemon juice

1 tablespoon chopped fresh flat-leaf parsley

1 tablespoon chopped fresh basil

1/2 teaspoon kosher salt

1/2 teaspoon freshly ground black pepper

6 tablespoons canola mayonnaise

How to Make It

Step 1

Stir together vinegar, sugar, and crushed red pepper in a medium microwave-safe bowl. Microwave at HIGH until hot and sugar has melted, 1 to 2 minutes. Add shallots. Let stand 5 minutes; drain.

Step 2

Preheat grill to medium-high (about 450°F).

Step 3

Using a sharp knife, cut lobster tails in half lengthwise; coat flesh with cooking spray. Place lobster tails, flesh side down, on grill grates; grill, uncovered, until grill marks appear, about 4 minutes. Turn lobster tails over, and grill, uncovered, until flesh is opaque, about 2 minutes. Remove from grill, and cool 10 minutes.

Step 4

Meanwhile, lightly coat bread with cooking spray. Cut each bread piece in half. Place bread, cut side down, on grill grate; grill, uncovered, until toasted, about 1 to 2 minutes.

Step 5

Remove meat from lobster tails, and chop. Discard shells. Stir together lobster meat, oil, tomato, lemon juice, parsley, basil, salt, and black pepper in a medium bowl.

Step 6

Spread 1 1/2 tablespoons mayonnaise on cut side of each bread piece; top evenly with lobster mixture and pickled shallot. Cut each bread piece into 5 slices.



ATLANTIC OFFSHORE LOBSTERMEN'S ASSN.

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Pro-active, common sense, member driven approach

WHAT WE DO

- ◆ Helped to establish Limited Entry in Area 3 lobster fishery
- ◆ Lobbied for Area 3 historic participation & transferability
- ◆ Secured funds to offset costs of sinking groundline
- ◆ Advocated for Jonah Crab Fishery Management Plan
- ◆ Led industry's response to the marine monument
- ◆ Strong advocate of common sense whale rules
- ◆ Leadership roles on the ASMFC's Lobster Board, Lobster and Jonah Crab Advisory Panels, and Area 3 LCMT
- ◆ NEFMC's Habitat Committee and NOAA Fisheries' Atlantic Large Whale Take Reduction Team member

2020 ISSUES

Right Whales	100% Vessel Reporting
Trap Cap Regulations	Marine Monument
Wind Energy	Bottom Sharing

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We understand that the spread of COVID-19 is having a major impact on your life, both on and off the job. In a difficult time marked by many uncertainties, rest assured that we at Fishing Partnership Support Services are here for you, your family, and the fishing community.

Fishing Partnership Support Services has decided to **CANCEL** our spring safety training season. This difficult decision was made in accordance with public health recommendations concerning large gatherings.

We recognize that the COVID-19 response will disrupt your income and financial security. Our physical offices may be temporarily closed, but we are still advocating for fishermen with legislators, listening to your needs, and planning for the future. As always, please let us know about your needs and ways we can support the fishing community.

-Fishing Partnerships Support Services

The Health Connector has extended Open Enrollment through April 25!

If you need health insurance, or have questions about your health insurance in Massachusetts, contact your local Navigator today.

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FISHING PARTNERSHIP SUPPORT SERVICES

2020 Spring Training Schedule

This spring, Fishing Partnership Support Services will be offering a variety of free trainings for commercial fishermen across the region.

Our popular **Safety & Survival Training** is a full-day, hands-on training for commercial fishermen. **Drill Conductor Certification** is a full-day training for those who have completed our Safety & Survival training and want to conduct required monthly drills on their own fishing vessels.

Find the trainings nearest you and visit our website or contact the Navigator listed to register.

Harwich Port, MA

April 2 - Safety & Survival

April 3 - Drill Conductor

Contact **Morgan** or

Shannon to register.

Southwest Harbor, ME

April 16 - Safety & Survival

April 17 - Drill Conductor

Contact **Nina** to register.

New Castle, NH

April 23 - Safety & Survival

April 24 - Drill Conductor

Contact **Maria** to register.

Point Judith, RI

April 23 - Safety & Survival

April 24 - Drill Conductor

Contact **Lori** to register.

Ocean City, MD

April 30 - Safety & Survival

May 1 - Drill Conductor

Contact **Deb** to register.

Harpwell, ME

May 7 - Safety & Survival

May 8 - Drill Conductor

Contact **Morgan** to register.

Gloucester, MA

May 14 - Safety & Survival

May 15 - Drill Conductor

Contact **Nina** or **Maria** to register.

Montauk, NY

May 21 - Safety & Survival

May 22 - Drill Conductor

Contact **Morgan** to register.

For more information, or to register for a training, contact a Navigator in your area:

Chatham

[Serving the Cape & the Islands]

Morgan Eldredge and Shannon

Eldredge (508) 237-9402

Gloucester

[Serving the North Shore]

Nina Groppo and Maria Carpenter

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Need Help with Health Insurance in Massachusetts?

You may still be eligible to enroll. Contact a Fishing Partnership Navigator for assistance with health insurance coverage, understanding your insurance benefits, or finding a doctor.

FISHING PARTNERSHIP



SUPPORT SERVICES

About Us

The mission of Fishing Partnership Support Services is to improve the health, safety and economic security of fishing families.

Founded in 1997, the Partnership is headquartered in Burlington, MA, and maintains offices in the Massachusetts port communities of Gloucester, Plymouth, New Bedford and Chatham. For more information visit www.fishingpartnership.org.

[In association with Massachusetts Fishermen's Partnership]

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