



Southern Shrimp Alliance

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September 28, 2021

The Honorable Richard W. Spinrad
Administrator
National Oceanic and Atmospheric Administration
1401 Constitution Avenue, NW
Washington, D.C. 20230

Dear Administrator Spinrad,

The Southern Shrimp Alliance (SSA) would like to draw your attention to what we believe is the critical role the National Oceanic and Atmospheric Administration (NOAA) must play in the development of offshore wind energy in the Gulf of Mexico (GOM) as part of the Biden Administration's commitment to advancing clean, renewable energy in the United States.

Consistent with its mission, NOAA must apply its expansive scientific competence to ensure such development is conducted in a sustainable manner that protects the future health of marine ecosystems in the Gulf and the fisheries that depend on them.

Toward achieving that goal, we strongly encourage and look forward to NOAA working in partnership with the Department of Interior's Bureau of Ocean Energy Management (BOEM).

For your information, SSA's membership is comprised of many small, family-owned businesses in the shrimp fisheries and associated shoreside enterprises operating in numerous coastal communities in all eight warm-water shrimp-producing states from Texas to North Carolina.

Shrimp fishing vessels hailing from ports throughout all five GOM states and from some Atlantic-coast ports conduct extensive fishing operations within the GOM Central and Western Planning Areas of the Outer Continental Shelf (OCS) recently identified by BOEM as part of its wind energy development initiative.¹

¹ BOEM, Request for Interest in Commercial Leasing for Wind Power Development on the Gulf of Mexico Outer Continental Shelf, June 11, 2021. <https://www.govinfo.gov/content/pkg/FR-2021-06-11/pdf/2021-12267.pdf>

Subject to NOAA's management authority pursuant to the Magnuson-Stevens Fishery Conservation and Management Act (MSA), all shrimp fishing vessels operating in these federal waters must possess a valid or renewable federal permit.

As of July 9, 2021, there were 1,358 federally permitted shrimp fishing vessels authorized to conduct shrimp fishing operations in these federal OCS waters in the GOM.² In addition, as of November 4, 2019, there were approximately 9,711 full and part time shrimp fishing vessels authorized by the GOM states to operate within GOM state waters.³ In 2018, 215.4 million pounds of shrimp were landed in the GOM with an ex-vessel value of \$393.6 million.⁴

Further, many shoreside businesses are dependent on providing goods and services to vessels fishing within the BOEM Planning Areas, including shrimp dealers, processors, and marine chandlers, in communities located in all five GOM states. In 2014, there were 627 shrimp dealers and 51 shrimp processors based in GOM ports, and the value of shrimp processed by those processors in that year was \$749.98 million.⁵

Indeed, the shrimp fishery is the most valuable fishery in the GOM, and the shrimp industry is at the core of the economies of numerous coastal communities throughout the region.

With this brief snapshot of the GOM shrimp industry in mind, the shrimp industry has identified a broad array of concerns with offshore wind energy development in the GOM for you to consider including, *inter alia*, the following:

- Displacement of the shrimp fishery from traditional fishing grounds and the associated adverse socio-economic impacts.
- Damage to shrimp fishing gear caused by debris and exposed transmission lines.
- Risks to safety of life at sea caused by obstructions to navigation and the effects of turbine operations on sea-state.
- Depletion of the health of protected species populations such as endangered sea turtles, coral habitat and other species for which the shrimp fishery is held strictly accountable.
- Displacement of shrimp vessels, processors and associated shoreside enterprises from working waterfront space and facilities essential to the fishery and processing sectors.

SSA has also provided a summary of these concerns to BOEM in response to their Request for Interest solicitation cited above.

² NOAA, Gulf Shrimp Permit data bank <https://portal.southeast.fisheries.noaa.gov/reports/foia/SPGM.htm>

³ NOAA, ENVIRONMENTAL IMPACT STATEMENT TO REDUCE THE INCIDENTAL BYCATCH AND MORTALITY OF SEA TURTLES IN THE SOUTHEASTERN U.S. SHRIMP FISHERIES, November 4, 2019, Table 1, ix <https://media.fisheries.noaa.gov/dam-migration/99187727.pdf>

⁴ NOAA, Fisheries of the United States, 2018, 8 <https://www.fisheries.noaa.gov/feature-story/fisheries-united-states-2018>

⁵ Id. at Tables 12, 13 and 103.

Offshore wind energy is not the only new marine activity confronting the traditional shrimp fisheries in the GOM - we have some similar concerns with NOAA's Aquaculture Opportunity Area (AOA) initiative which we addressed in comments to NMFS in December 2020.

However, we found that the analytical approach to spatial planning applied by the National Ocean Service (NOS) in that AOA initiative to be the most useful tool for supporting this critical decision-making. This includes suitability modeling and mapping of the full range of relevant civilian and military marine activities in the Gulf along with those elements of the marine ecosystem that would be vulnerable to the cumulative impacts of new, wind energy-related ocean stressors.

We note further that the NOS spatial planning work has the benefit of more than 15 years of precise spatial and temporal scientific data on shrimp fishing effort collected through electronic logbooks and analyzed by the National Marine Fisheries Service (NMFS). This same NOS/NMFS collaboration and expertise must be broadly applied to BOEM's marine spatial planning for offshore wind energy development in the GOM.

And so, we reiterate; NOAA and BOEM must partner and collaborate in applying this marine spatial planning approach using the best scientific information available while fully engaging the shrimp industry and all other established ocean users in an open and transparent decision-making process for developing offshore wind energy in the GOM.

Thank you for your consideration.

Sincerely,



John Williams,
Executive Director

cc: Janet Coit, Assistant Administrator for Fisheries
Nicole LeBoeuf, Director, National Ocean Service
Amanda Lefton, Director, BOEM