

Advocacy Comments BOEM's Request for Information on Mitigation of Offshore Wind Development on Fisheries

On November 22, 2021 the U.S. Department of the Interior's Bureau of Ocean Energy Management (BOEM) published a Request for Information on Reducing or Avoiding Impacts of Offshore Wind Energy on Fisheries. On January 7, 2022 the Office of Advocacy (Advocacy) submitted the following comments:

- Advocacy held a small business roundtable on December 14, 2021 at which small businesses offered comments and feedback on the guidance, and other issues related to offshore wind leasing.
- Several small fisheries spoke about the challenges in commenting on theoretical lease proposals, stating that there are simply too many unknowns, and that impacts are hard to calculate until a plan is submitted. Commenters also spoke about the time-costs associated with attending multiple scoping meetings, listening sessions, and briefings hosted by the agency and developers. They stated they felt as though they were not heard and that BOEM and the developers were not adequately responding to comments.
- Many commenters also noted BOEM's hasty timeline for development of this guidance stating that it did not allow for them to provide substantive feedback, given that many projects are still in very early stages.
- BOEM's guidance documents should not be "one and done;" rather the agency should conduct ongoing outreach and outline plans for regular updates.
- BOEM should conduct proper and thorough small business impact analyses for each proposed construction and operation plan and publish such analyses for notice and comment.
- BOEM should identify the small businesses impacted by a proposed construction and operations plan (COP), discuss any known impacts to those small businesses, offer alternatives to the proposed COP, and solicit specific comments and feedback from small businesses on this analysis.

For more information visit Advocacy's web page at advocacy.sba.gov, or contact Prianka Sharma at (202) 205-6938 or prianka.sharma@sba.gov.

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