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February 22, 2019

Comment E-Filed

Program Manager  
Office of Renewable Energy  
Bureau of Ocean Energy Management  
45600 Woodland Road  
Sterling, VA 20166

Re: Vineyard Wind COP Draft EIS

Dear Sir or Madam:

On behalf of the Fisheries Survival Fund (“FSF”), we submit the following comments in response to the Draft Environmental Impact Statement (“EIS”) for the Vineyard Wind Construction and Operations Plan (“COP”). FSF represents the significant majority of the full-time limited access permit holders in the Atlantic scallop fishery. Our members are home-ported along the Atlantic coast from North Carolina and Virginia north through New Jersey, Connecticut, and Massachusetts.

The Draft EIS for the Vineyard Wind COP is especially important in that it is the first draft EIS for a COP to be released for public comment. As we have repeated and documented to BOEM over the past several years, FSF does not believe that BOEM’s leasing procedures adequately account for the impacts to the scallop fishery — or any commercial fishery, for that matter — from offshore wind energy development.

Indeed, it defies both the world-wide experience with offshore wind energy development projects and ordinary common sense to seek to claim that development of these massive projects will not have profound ecological impacts on ocean and benthic habitats, including the habitat for commercially important fish species. It is equally implausible to contend these major offshore developments, whether considered one at a time or cumulatively, will not have major impacts on established marine fisheries in the area. Further, slicing and dicing wind energy development phases and projects, so as to segment important National Environmental Policy Act

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("NEPA") analyses, is contrary to NEPA's letter and spirit. Nor is that blinkered approach consistent with the Outer Continental Shelf Lands Act, as amended.

Accordingly, FSF adopts the thoughtful and detailed comments on the Vineyard Wind COP submitted by the Responsible Offshore Development Alliance ("RODA"). RODA painstakingly details the work that is required to be done as a matter of law and science to make reasonably well-informed decisions regarding the siting, construction and operations of these wind projects. We appreciate your consideration of our comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "David E. Frulla", with a long horizontal line extending to the right.

David E. Frulla  
Andrew E. Minkiewicz

*Counsel for Fisheries Survival Fund*