Mid-Atlantic Fishery Management Council
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P. Weston Townsend, Chairman | Michael P. Luisi, Vice Chairman
Christopher M. Moore, Ph.D., Executive Director

June 11, 2025

Kelly Hammerle
Bureau of Ocean Energy Management
45600 Woodland Road
Sterling, VA 20166

Dear Ms. Hammerle:

Please accept these comments from the Mid-Atlantic Fishery Management Council (Council) on the Request for Information regarding the 11th National Outer Continental Shelf Oil and Gas Leasing Program. This letter reiterates comments the Council provided to BOEM in 2017 on the 2019-2024 leasing program.[1] In addition, the Council's attached Policy on Offshore Oil is attached for your consideration.

The Council manages commercial and recreational fisheries for more than 65 marine species[2] in federal waters and is composed of members from the coastal states of New York to North Carolina (including Pennsylvania). The Council has also enacted measures to identify and conserve essential fish habitats, protect deep sea corals, and sustainably manage forage fisheries.

Species managed by the Mid-Atlantic Council are harvested along the entire East Coast. These fisheries are profoundly important to the social and economic well-being of coastal communities and provide numerous benefits to the nation, including domestic food security. In 2022, the commercial fishing industry in the Mid-Atlantic region supported 35,406 jobs and generated $2.1 billion in sales, $752 million in income, and $1 billion in value added impacts. Commercial fishermen landed 542 million pounds of finfish and shellfish, earning $484 million in landings revenue. Recreational anglers took 68 million fishing trips, landing 98 million fish and spending $3.6 billion on trip and equipment expenditures.[3]

Although the Council recognizes the importance of energy exploration to U.S. economic security, we are deeply concerned about the potential negative impacts of oil and gas exploration and development on the marine ecosystem and the health of our nation's fisheries. The environmental risks associated with offshore oil and gas development are not consistent with the Council's vision of "healthy marine ecosystems, thriving fishing communities, and sustainable fisheries that provide the greatest overall benefit to the nation."

Over the past several decades, the Council has implemented management programs to support sustainable fisheries and rebuild overfished stocks. These efforts have necessitated sacrifice from the commercial and recreational fisheries in the form of economic losses and foregone fishing opportunities. Protecting the gains achieved through these efforts and preserving the health of the marine ecosystem on which these fisheries depend, is of utmost importance to the Council.

Oil and gas development could have broad and cascading effects on the marine environment from our

[1] https://www.mafmc.org/s/2019to2024Program_MAFMC_Comments_2017-08-07.pdf
[2] 15 species are managed with specific Fishery Management Plans, and over 50 forage species are managed as "ecosystem components."
[3] NOAA Fisheries Office of Science and Technology, Commercial Landings Query, Available at: www.fisheries.noaa.gov/foss, Accessed 2/28/25

shorelines to the farthest reaches of the Atlantic Outer Continental Shelf. These impacts would not be localized to lease areas, and cumulative impacts at the regional scale must also be considered. Negative impacts could result from a variety of impact producing factors, including noise, expansion of shoreside infrastructure, installation of underwater pipelines, and potentially catastrophic accidental oil spills.

Of particular concern to the Council is the increased propagation of sound, especially from geologic and geophysical surveys, but also from construction, operations, and increased vessel traffic. This can impact many marine species that depend on sound for their most vital life functions. NOAA's Ocean Noise Strategy Roadmap[4] recognizes that "sound is a fundamental component of the physical and biological habitat that many aquatic animals and ecosystems have evolved to rely on over millions of years." The strategy also notes that changes in the acoustic environment caused by human activities "can lead to reduced ability to detect and interpret acoustic cues that animals use to select mates, find food, maintain group structure and relationships, avoid predators, navigate, and perform other critical life functions." A study published in Nature showed that air guns cause significant mortality to zooplankton populations, even > 1 km from the seismic source.[5] Since zooplankton are a part of the food chain base, this could have profound negative impacts on our marine resources and the millions of Americans who benefit from them.

The Council has worked to protect some of the region's most sensitive habitats. These protections could be undermined by offshore oil and gas development. For example, the Council restricted fishing activity in the Frank R. Lautenberg Deep Sea Coral Protection Area, an area the size of Virginia encompassing more than 38,000 square miles of federal waters, to protect slow-growing, fragile deep sea corals from the impacts of fishing gear. This area includes canyons with unique biological and oceanographic features making them both ecologically and economically important to the marine environment and our fisheries. This protected area should not be considered for any stages of offshore oil and gas leasing or production.

At present, there is insufficient information about how oil and gas exploration and development activities throughout our region may affect fish, invertebrates, marine mammals, benthic communities, and ecosystem structure and function. Given the value of living marine resources and our fisheries along the coast, additional research is needed to better understand the environmental consequences of these activities.

Thank you for your consideration of these comments. The Council looks forward to working with BOEM to ensure that any future energy development activities minimize impacts on the marine environment.

Please contact me if you have any questions.

Sincerely,

Dr. Christopher M. Moore
Executive Director, Mid-Atlantic Fishery Management Council

Attachments:

- Council Policy on Offshore Oil (12/7/2015)
- Infographics on the value of Mid-Atlantic Fisheries

cc: J. Beaty, W. Townsend, M. Luisi

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[4] Available at https://oceannoise.noaa.gov/sites/default/files/2021-02/ONS_Roadmap_Final_Complete.pdf

[5] McCauley, R.D., R.D. Day, K.M. Swadling, Q.P. Fitzgibbon, R.A. Watson, and J.M. Semmens. 2017. Widely used marine seismic survey air gun operations negatively impact zooplankton. *Nature* Ecology & Evolution 1. Doi: 10.1038/s41559-017-0195. Available at: https://www.nature.com/articles/s41559-017-0195.

Council Policy on Offshore Oil

Policy Goals: *The Council supports policies for US energy development that will sustain the health of marine ecosystems and fishery resources while minimizing the risks to the marine environment and fisheries.*

1. The Council is committed to the effective stewardship of the marine fisheries and associated habitats in the Mid-Atlantic region. The environmental risks associated with offshore oil development and operations are not consistent with the Council's vision for healthy and productive marine ecosystems supporting thriving, sustainable marine fisheries.

2. Renewable energy, if implemented in a manner which minimizes impacts on fish habitat and fisheries, may be more consistent with the Council's vision for sustainable fisheries.

If offshore oil development moves forward:

3. Best management practices should be implemented throughout offshore oil development and operations to avoid adverse impacts on fish habitat and conflicts with other users groups, including recreational and commercial fisheries.

4. Coordination should occur across regions to avoid conflicts between Highly Migratory Species fishing tournaments and oil development surveys (e.g., seismic testing).

5. Nearshore/onshore facilities associated with exploration and production (e.g., pipelines, access roads and bridges, and other structures) should not be constructed through areas with sensitive fish habitat such as shellfish beds, fish spawning and/or nursery habitat areas, submerged aquatic vegetation (SAV), or hard/structured habitat.

6. The need for additional dredging should be reduced by expanding or repurposing sites with existing deep water facilities, such as existing oil facilities and other industrial sites or ports.

7. Handling of oil during transportation should not occur in sensitive fish habitat.

8. Offshore oil development should not occur in sensitive habitats already prohibited to fishing, including discrete and broad areas on the Outer Continental Shelf identified for deep sea coral protection.

9. The Council encourages the use of the best commercially available technology, including horizontal directional drilling, to avoid potential impacts to sensitive habitat.

10. Monitoring and leak detection systems should be used at oil extraction, production, and transportation facilities to prevent oil from entering the environment.

11. The disposal of chemicals/contaminants used in petroleum development should be rigorously regulated. The discharge of chemicals, produced waters, drilling muds, and cuttings into marine and estuarine environments should be avoided. Frac-out plans should be developed, and produced waters should be reinjected into the oil formation, whenever possible. The physical and chemical effects of discharges on pelagic and benthic species and communities should be carefully monitored.

12. Potential adverse impacts to marine resources from oil spill clean-up operations should be weighed against the anticipated adverse effects of the oil spill itself. The use of chemical dispersants in nearshore areas where sensitive fish habitat is present should be avoided.

13. Oil production and transportation facilities should develop and implement adequate oil spill response plans and protocols[1]. These plans should:

    a. Include the identification of sensitive marine habitat;
    b. Include methods to track the movement of spills;
    c. Ensure adequate response equipment is immediately available; and
    d. Allow researchers to have timely access to impacted areas, as needed.

14. Short- and long-term impacts from sound during exploration, construction, and operation on the environment/ecosystem (including marine mammals, sea turtles, fish populations, and associated fisheries) should be evaluated and minimized using time and area restrictions (see General Council Policies).

15. The Council supports the development of a compensatory mitigation fund for damages that occur to the marine environment and fish habitat as well as damages to fishing vessels, their gear, and operations/revenue, as a result of offshore oil activities.

[1] Consistent with the US Coast Guard, US Environmental Protection Agency, Occupational Safety & Health Administration/HAZMAT, and other state or Federal requirements.

MID-ATLANTIC FISHERIES

Commercial and recreational marine fisheries in the Mid-Atlantic region support jobs, businesses, and coastal communities, providing recreational opportunities and supplying fresh seafood to local and global markets. The Mid-Atlantic Fishery Management Council develops science-based management plans to ensure the long-term sustainability of these fisheries and the marine ecosystem.

MID-ATLANTIC FISHERY MANAGEMENT COUNCIL

542 Million
Pounds of fish & shellfish harvested in the Mid-Atlantic by commercial fishermen in 2022

which generated

$484 Million
in landings revenue

53,307
nautical miles²
Area managed by the Mid-Atlantic Council

15
Species managed by the Council under fishery management plans

50
Additional forage species managed as "ecosystem components"

68 Million
Number of recreational fishing trips taken in the Mid-Atlantic in 2022

35,406
Jobs supported by the commercial fishing industry in 2022

19.7
Pounds of fish & shellfish eaten by average Americans per year

$5.5 Billion
Combined sales impacts of the commercial and recreational fishing industries in the Mid-Atlantic region in 2022

$3.6
Billion
Total spending on recreational trip expenditures

98
Million
Number of fish harvested by recreational anglers

which makes the U.S.

4th
Largest consumer of seafood in the world (trailing only China, India, and Indonesia)

23,313
Jobs supported by the recreational fishing industry in 2022

DID YOU KNOW?

Atlantic Mackerel
Atlantic Mackerel are graded by fat content with the highest-fat content fish fetching the best prices in a worldwide market.

Longfin & *Illex* Squid
Longfin squid can change colors rapidly when threatened or excited by expanding or contracting bags of color in their skin.

Butterfish
Developed as an export market to Japan, butterfish were auctioned off & served as breakfast at high-end hot-springs resorts.

Spiny Dogfish
This small shark has venomous spines in front of its dorsal fins, which it uses for defense against predators.

Summer Flounder
Summer flounder are masters of camouflage, capable of changing their skin color and pattern to blend in with the ocean floor.

Scup
Scup are small fish but they fight energetically when hooked, making them a favorite target for both child and adult anglers.

Black Sea Bass
Black sea bass are protogynous hermaphrodites, meaning many begin life as females and later transition to males as they grow.

Bluefish
Known as the "marine piranha" because of its aggressive feeding habits, bluefish have been known to bite humans.

Tilefish
Tilefish only live along outer edge of continental shelf, where the sea floor is bathed by warm waters from the Gulf Stream.

Monkfish
Using their large mouths, monkfish have been known to eat prey half their size, and capture water-birds at the sea surface.

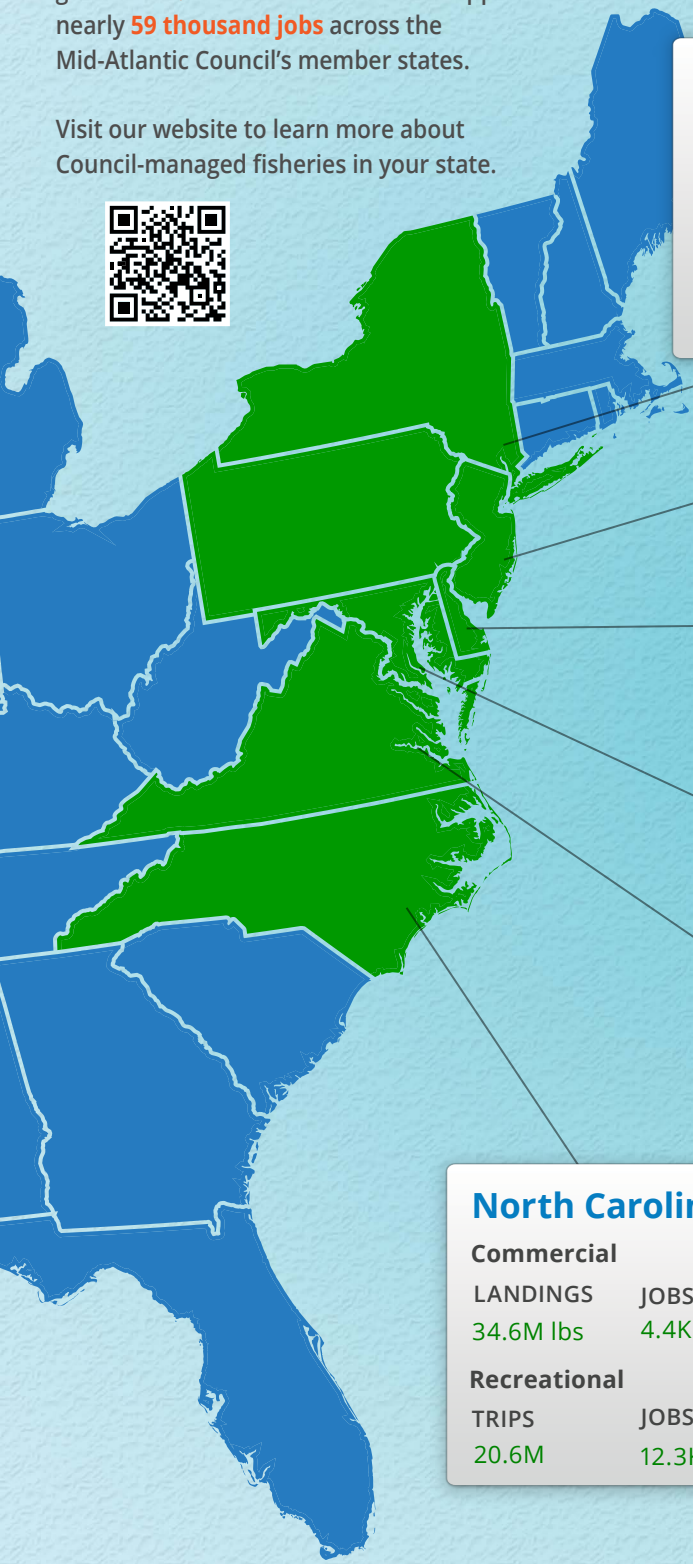
Surfclam & Quahog
Surfclams and ocean quahogs were the first U.S. fisheries managed under catch shares programs.

February 2025

Mid-Atlantic Fishery Management Council
FISHERY IMPACTS BY MEMBER STATE

In 2022, commercial and recreational fisheries generated **$5.5 billion in sales** and supported nearly **59 thousand jobs** across the Mid-Atlantic Council's member states.

Visit our website to learn more about Council-managed fisheries in your state.



New York

Commercial

LANDINGS	JOBS	SALES
19.1M lbs	3K	$139M

Recreational

TRIPS	JOBS	SALES
16.5M	2.4K	$378M

New Jersey

Commercial

LANDINGS	JOBS	SALES
107.9M lbs	6.5K	$528M

Recreational

TRIPS	JOBS	SALES
13.9M	3.5K	$673M

Delaware

Commercial

LANDINGS	JOBS	SALES
5.2M lbs	655	$74M

Recreational

TRIPS	JOBS	SALES
2.4M	749	$110M

Maryland

Commercial

LANDINGS	JOBS	SALES
33.2M lbs	6.9K	$362M

Recreational

TRIPS	JOBS	SALES
8.2M	2.7K	$387M

Virginia

Commercial

LANDINGS	JOBS	SALES
341.6M lbs	14K	$769M

Recreational

TRIPS	JOBS	SALES
6.5M	1.7K	$246M

North Carolina

Commercial

LANDINGS	JOBS	SALES
34.6M lbs	4.4K	$212M

Recreational

TRIPS	JOBS	SALES
20.6M	12.3K	$1.6B

February 2025

*This infographic reflects 2022 commercial and recreational fisheries data published by NOAA Fisheries as of February 2025. Commercial jobs and sales values are based on domestic harvest and do not include seafood imports. Visit the **Fisheries One-Stop-Shop** for the most recent data and publications.*

MID-ATLANTIC FISHERY MANAGEMENT COUNCIL