



August 19, 2020

New Jersey Board of Public Utilities
Mr. Joseph Fiordaliso, President
44 S Clinton Ave
P.O. Box 350
Trenton NJ 08625-0350

RE: New Jersey BPU Solicitation #2 Draft Guidance Document

Dear President Fiordaliso;

On behalf of Garden State Seafood Association GSSA I ask that the following comments be considered regarding the New Jersey Solicitation #2 Draft Guidance Document. We appreciate the BPU providing this opportunity to provide our comments and concerns associated with the guidance, and are very pleased that the document requires a fisheries protection plan.

The Garden State Seafood Association is a statewide organization of commercial fishermen and fishing companies, land based processors, related businesses and individuals working in common cause to promote the interests of the commercial fishing industry and seafood consumers in New Jersey. The Association's primary goal is to assure that our marine resources are managed responsibly and that all of the people in New Jersey, whether as anglers or as seafood consumers, will be able to enjoy the bounty of New Jersey's rich coastal and offshore waters for generations. It is also worth noting that we are not only concerned about our access to marine fishery resources, however, our land based processing facilities are large consumers of power, and we are equally concerned about the potential cost increases associated with these projects on our operations.

General Comments

We believe the guidance document should request some broader considerations for the development community. One being that any new submission should include required consideration of cumulative impacts of pre-approved development as well as the proposed additional solicitations. Specifically impacts such as environmental, fisheries, port access, and transmission will all be compounded as numerous NJ and competing state projects are

developed. This analysis would also identify where existing jobs, training and infrastructure already exist to minimize costs, as new supporting industries may not need to be redeveloped. Each project will not be starting from scratch. The solicitation should include a cumulative analysis to help minimize the cumulative impacts and identify ways to minimize them on New Jersey rate payers, environmental resources and fisheries.

Additionally, we believe the BPU should include in the solicitation guidance, a requirement for safe spacing between competing lease locations. Without this requirement developers may push lease boundaries impacting previous projects by placing layout nearly on top of a neighboring adjacent lease. Additionally this spacing, and we would propose a minimum of 4 nautical miles between projects, would allow additional transit lanes, and provide a safety buffer during construction and decommissioning operations of competing projects.

3.9 Environmental Protection Plan and Emission Impacts

This section we believe specifically should consider cumulative impacts of the projects on our environment. Additionally fisheries and fish should be more clearly included in this sections analysis for ecological impacts. Many fish are also ecologically significant and as such the whole environmental food web and the potential impacts should be considered.

Emissions should also include an analysis of increased emission resulting from vessels transiting around the project if specific transit lanes are not included in the project design.

The bullet on top of page 20 on identified impact should specifically include noise mitigation in construction, operation and decommissioning

The Environmental analysis must consider the effect of windmill projects on the seasonal cold pool of the mid-Atlantic region. This unique environmental resource/event must be protected and the Environmental Protection Plan for this projects should clearly state how their design and operation will insure zero impact on the cold pool.

3.10 Fisheries Protection Plan

Again, we believe there should be a clear requirement for cumulative impact of projects on fisheries.

There needs to be requirement for the developers to include what specific marine navigational aids and beacons will be included in their design and development.

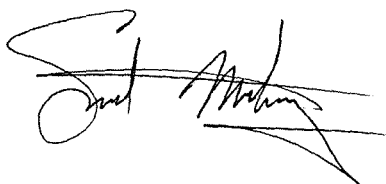
We believe “reasonable accommodations” is too nebulous. Specifically we request at least two 2nm transit corridors, one for shore bound traffic and the other ocean bound traffic and as data suggests two-directional offshore traffic transit lanes along existing fishery transit routes, be required in each design using historic transit data from NJ ports.

The economic analysis should also consider the impact on land based supporting industries, such as seafood processors, freezers, canner and other value added businesses. These NJ businesses

have invested millions of dollars to maximize the value of our environmental resources to the betterment of our State and economy. They should not be overlooked. This should also include an impact analysis of recreational bait and tackle shops as well as restaurants.

Again, we thank you for this opportunity to provide these comments and would be happy to discuss any questions that might arise during your deliberations.

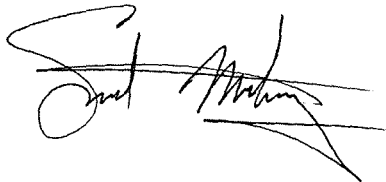
Sincerely,

A handwritten signature in black ink, appearing to read "Scot Mackey". The signature is stylized with a large initial "S" and a long horizontal stroke extending across the middle of the name.

Scot Mackey
Executive Director

Thank you for considering these comments and I am happy to address any questions stemming from these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Scot Mackey". The signature is stylized with a large initial "S" and a long horizontal stroke extending to the right.

Scot Mackey
Executive Director