

## COASTAL PELAGIC SPECIES SUBPANEL REPORT ON HABITAT ISSUES

The Coastal Pelagic Species Advisory Subpanel (CPSAS) supports the Habitat Committee's draft letter to the California Energy Commission (Agenda Item J.1, Attachment 1) regarding offshore wind development planning off the West Coast and recommends the Council submit the letter with the following suggested additions. These suggestions are intended to highlight potential impacts and the need to incorporate the expertise of fishermen and field-research scientists to minimize interactions with fisheries and longstanding scientific research programs.

The Pacific Fishery Management Council strives for sustainable recreational and commercial fisheries, ecosystem-based management, habitat protection, and healthy wildlife populations. West Coast fisheries have made progress in conserving fishery resources and reducing harmful interactions with protected species. In addition to directly impacting fishing opportunities, offshore wind construction and permanent structures may adversely impact the ability to conduct fishery science as well as safe passage and migration for various West Coast migratory species including fish, sea turtles, seabirds, pinnipeds, dolphins, and whales, some of which are listed as endangered. This could harm the California Current Ecosystem's ability to support abundant wildlife and adversely modify critical habitat for endangered species. Additional human-caused mortality from offshore wind may increase cumulative impacts to protected species. If cumulative impacts exceed biological or legal thresholds, this could indirectly harm fisheries by prompting additional fishery management measures and constraints. In addition, offshore wind development may disrupt foraging opportunities for wildlife species and destroy or harm seafloor habitats such as deep-sea corals and sponges.

To incorporate a range of stakeholder expertise into the planning process, including representatives appointed by fishing organizations representing active recreational and commercial fishermen, we suggest reviewing previous marine spatial planning exercises and incorporating fishery expertise before leasing applications are considered. For example, an Adaptive Environmental Assessment Modeling process including knowledgeable fishermen and other stakeholders could identify areas that minimize user conflicts. Including fishermen at the table at the beginning of the process is key to a successful outcome.

As part of the spatial planning exercise, it will be important to locate structures outside the transect lanes established for long-established fishery and other scientific surveys to avoid disrupting the precision of data metrics developed over decades.

Any additional resources and costs that the National Marine Fisheries Service incurs as part of the siting and impacts analysis should be funded by the applicants for individual wind energy projects.