

ECOSYSTEM WORKGROUP REPORT ON HABITAT ISSUES

The Ecosystem Workgroup (EWG) reviewed the draft letter to the California Energy Commission under Agenda Item J.1, Attachment 1 and commends the Habitat Committee for a thorough letter of comment. We offer these comments and recommendations for the Council's additional consideration:

- Similar to our comment under Agenda Item C.2, we note that Chapter 5 of the 2013 Fishery Ecosystem Plan, *PFMC Policy Priorities for Ocean Resource Management*, offers a useful set of considerations for any agency proposing new activities within marine waters off the U.S. West Coast. We particularly suggest that the California Energy Commission consider the effects of new installations, installation operation, and installation removals on structure-forming invertebrates, endangered or threatened species that may reside in or migrate through the call areas, trophic interactions that may occur within the call areas, and fisheries that may rely on operating in locations within the call areas.
- We also remind the Council that the California Current Integrated Ecosystem Assessment (CCIEA) and the associated annual ecosystem status report provide a broad range of indicators and other useful information that can support the analysis of the effects of a variety of human activities on the ecosystem. For example, the annual ecosystem status report includes a “gear contact with seafloor” indicator that focuses on trawl gear, and which could be used to consider whether fisheries will be displaced by new installations within the call areas. The EWG also notes that the CCIEA team previously developed a long list of non-fisheries pressures on the California Current Ecosystem in support of the development of the ecosystem status report and essential fish habitat reviews. The Council may want to ask the CCIEA team to revive and update that list, if doing so would be helpful to future Council work on non-fishing activities within marine waters off the West Coast.
- In addition to considering whether existing fisheries may be displaced by new installations in the call area, we suggest that the Council consider whether fishery participants may switch to new fisheries or new fishing areas if those participants are displaced from historic fishing sites. If this occurs, it will also be important to determine the impacts on fisheries, communities, and the ecosystem as a whole.
- Given this equipment has a defined life-span, we suggest that end of project life planning is included in any wind farm leases and that construction planning include funding for decommissioning and considering ecosystem effects. The construction, operation, and decommissioning periods all would benefit from focused data collection to understand baseline habitat and ecosystem structure, impacts from each phase, and then response of the ecosystem once decommissioning is complete.

Finally, we repeat our note from Supplemental Report C.2.a on Executive Order 13921 that the Council may wish to consider expanding or revising the process by which it reviews new activities proposed for the Exclusive Economic Zone off the West Coast. Fishery management councils on the U.S. East Coast are having to consider the effects of new offshore wind energy installations on

fish stocks, fisheries, and fishing communities.¹ West Coast states, tribes, and the larger Council family might benefit from communicating with our East Coast counterparts on their experiences addressing the intermingling of fisheries and other offshore uses of the marine environment. The EWG will bear these challenges in mind as we work on updates to the Fishery Ecosystem Plan.

PFMC
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¹ From the Mid-Atlantic Fishery Management Council:
https://static1.squarespace.com/static/511cdc7fe4b00307a2628ac6/t/5d5d8febbf55c300017b65be/1566412785315/NOAA+Fish+Wind.8.21.2019_new.pdf