

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON MARINE PLANNING UPDATE

Coastal Pelagic Species Advisory Subpanel (CPSAS) members considered the February 24 presentations by the National Oceanic and Atmospheric Administration (NOAA) on its Aquaculture Opportunity Area (AOA) in southern California, and by the Bureau of Ocean Energy Management (BOEM) on Offshore Wind Energy (OSW) on the U.S. West Coast. Members then discussed the Habitat Committee's (HC) excellent report on the presentations. The CPSAS agrees with the HC's comments in their supplemental report in regard to AOAs and OSW as it covers many of our concerns for the future of our fisheries, ecosystems, essential fish habitat, and ocean environment related to offshore industrial development. It was thorough and very inclusive of factors which need to be included in the final siting decisions. We are in full agreement with the following comments of the HC:

- (AOA and OSW): "Much of the expertise that should be considered with respect to siting are beyond the Habitat Committee's current abilities, purview, and workload."
- (OSW) "The HC is concerned that the development and analysis of fishery, socioeconomic, habitat, and other ecological data that was used to inform the call area and site selection process currently underway has not been thoroughly vetted or peer-reviewed by subject matter experts and that BOEM is now too far along to allow for critical review of these data."
- (OSW) "Several fishery and ecological datasets were scored with low confidence."
- (OSW) "Furthermore, blocks that indicate no fishing activity due to the Rockfish Conservation Area (RCA).....would score higher as suitable for energy siting, but with recent modifications to the Trawl RCA [rockfish conservation area] these blocks could potentially be prime fishing grounds going forward."
- (OSW) "Transmission cable connectivity to the shore-based electrical grid is a critical component in BOEM's suitability criteria, and yet the cable route itself is not necessarily evaluated for suitability (or non-suitability) with respect to fishery resources or fishing..."
- "At this very early stage of the process, BOEM should solicit input from the Council and other management bodies..."

The CPSAS recognizes that spatial planning can be a superior approach versus ad hoc project by project. However, to address our serious concerns in addition to the comments of the HC, the CPSAS recommends the following in order to improve the process and bring further clarity to final decisions on sites for aquaculture and offshore wind development. These should be done prior to the National Environmental Protection Act (NEPA) process to the extent practicable. The CPSAS offers the following comments, primarily on AOAs:

- Climate change is changing the distribution and abundance of CPS. NOAA should better describe how its aquaculture "suitability model" is integrating climate uncertainty.
- Strong analysis is needed of the cumulative impacts expected for aquaculture as well as wind projects. NOAA and BOEM should describe or estimate the total number of wind

farms/turbines and “fish farms” that are being envisioned and their placement and then conduct a cumulative impacts analysis.

- Areas of importance to CPS fishing and exclusion zones related to the sites must be thoroughly described. Ensure fishery impacts are accurately weighted.
- Maps need to show greater detail about siting as CPS fishing may occur in the area.
- Under the NEPA review for the final AOA sites selected, there needs to be a strong analysis of economic impacts.
- Co-location of AOAs and offshore wind sites needs to be considered to help reduce impacts to fishing and the ecosystem.
- Coordination is needed with states which are considering project proposals in state waters.
- 116 layers were put into a generic category called “characterization” layers and not used in the suitability model - for example highly migratory species. Those decisions need explanation and ground truthing with fisheries and ecosystem experts.
- National Marine Fisheries Service needs to explain the exact process for ground truthing the overall suitability model outcomes.

Regarding OSW, the CPSAS notes that the BOEM presentation did not mention the following critical issues:

- Tension and fishing industry resistance have increased on the East Coast (and West Coast), but there was no word about how BOEM is responding to those concerns.
- There has been no mention of electrical rates needed to make offshore wind viable. Nor has BOEM offered comparative costing models to see how offshore wind compares to land-based sustainable energy sources (including nuclear in addition to wind and solar).
- To date no studies have been initiated on total cumulative impacts to fisheries, habitat, and ecological systems.
- There has been no information on what the target is for the total number of wind farms and turbines to be deployed.
- There was no analysis or mention of total job displacement in the fishing industry relative to new U.S. jobs in the energy industry during construction and/or operational phases.
- BOEM has not addressed the failure of the initial Environmental Impact Statement for Vineyard Wind, and we are unclear what they will change in order to ensure a successful process that complies with NEPA.

We highlight these points as BOEM and lessees for wind energy real estate to date have not engaged in a transparent process that adequately heeds fishermen’s and other stakeholders’ concerns and affords protections to our industry, our habitat, and our ecosystems. Renewable energy is coming, but before risking all our fishing grounds and ocean habitat carte blanche to these huge industrial projects, all potential side effects should be carefully evaluated by subject matter experts. If our fisheries are eliminated, they are not likely to return when the next wave of green energy takes us in a new direction.

PFMC
03/03/21