

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON MARINE PLANNING

The Coastal Pelagic Species Advisory Subpanel (CPSAS) is very concerned about present plans for offshore development that is likely to impact our fisheries. In fact, fishermen strongly oppose offshore development initiatives. Fishermen have been and are being excluded from the decision-making process.

Concerns include the recently energized siting process underway for marine development in our West Coast Exclusive Economic Zone (EEZ): specifically, Offshore Wind Energy (OSW). In addition, in our March report we enumerated several concerns about NOAA's [Aquaculture Opportunity Areas](#) initiative (AOAs), one of which is located in southern California.

Regarding OSW, in April of 2021, the Departments of Fish and Wildlife from California, Oregon, Washington, and Idaho issued a four-state report on Marine Planning at the April 2021 Council meeting, or [Four State Report](#). Mr. Chuck Tracy and Council Staff did an analysis of the Four State Report ([Agenda Item C.4, Attachment 1](#)). Eight major fishing organizations submitted supplemental comments, voicing their concerns for the probable loss of important fishing grounds and potential impacts to Essential Fish Habitat (EFH). In addition, it has been expressed that the overall process of OSW permitting and analysis of potential economic loss to fisheries managed by the Pacific Fishery Management Council (Council) is not transparent. Nor are impacts sufficiently analyzed, and further, the process provides no forum for fishermen and fishing community input. This is a major oversight. For example, the Bureau of Ocean Energy Management (BOEM) East Coast Vineyard Offshore Wind Energy project Environmental Impact Statement (EIS) analysis predicts major impacts to East Coast fisheries [Vineyard-Wind-1-Supplement-to-EIS.pdf](#).

There is immediate need to create an advisory body and forum for industry and other stakeholders to voice their concerns in a public venue and provide advice to the Council. The CPSAS supports a modified version of Option C found in the Four State Report and in the Council Staff Analysis. We are also supporting recommendations contained in the C.4 Supplemental Comments. This action follows traditional Council practices as outlined in the Four State Report: *“The Council has a longstanding tradition of providing an inclusive forum for governments, scientific and industry experts, and interested and affected communities to effectively and efficiently bring information and advice together to inform the Council’s decisions and recommendations to NOAA Fisheries and other entities (Four State Report)”* and *“The four states are interested in learning from the Council’s Executive Director about potential options for facilitating a PFMC advisory body engagement with offshore development. (Four State Report).”*

Additionally, in an October 13, 2013, Council letter issued to the Department of Commerce, Dr. Don McIsaac stated: *“It is imperative that wind energy developers consult with the local fishing industry before projects are sited...”*

The CPSAS concurs with the Four State Report and Dr. McIsaac that the Council does have a role to play advising agencies when their actions threaten our fisheries or our ocean environment. At the least, a public and full analytical process on impacts should occur with fishery and Council input before these siting actions are implemented. While there is a wealth of knowledge that the Council and Council staff possess, the advisory bodies also possess important supplemental knowledge. In addition, AB representatives are the closest to the stakeholders they represent.

CPSAS recommendations:

The CPSAS concurs with the Pacific Whiting Conservation Cooperative's (PWCC) supplemental comments that contains recommendations on Marine Planning:

- (1) state in a letter to BOEM that displacement of Council-managed fisheries and the scientific research that supports sustainable fisheries is a conservation and management concern for the Council,*
- (2) indicate that meaningful engagement in the offshore development arena is important to the Council and Council process,*
- (3) establish a new advisory body specifically tasked with addressing offshore development, and*
- (4) seek opportunities to collaborate with the NMFS and other Federal and state agencies in a coordinated effort to ensure an effective balancing of new offshore development with Council managed fisheries, including identifying and securing resources and staff to support these efforts* ([C.4, Supplemental Public Comments](#))

The CPSAS also recommends an expansion of the third PWCC recommendation to include the following.

1. A marine planning ad hoc advisory body (MPAB) should be started as soon as possible after the June Council meeting. The MPAB should cover both OSW and the NOAA Aquaculture Opportunity Area (AOA) initiative.
Our concerns about the AOA initiative were shared by the Habitat Committee (HC) and other advisory bodies. The Council has not been provided an update by NOAA about AOA's since the [presentation in March](#), but we assume NOAA is continuing to advance that program, along with OSW.
2. The MPAB needs to be nimble and responsive.
3. The MPAB should be relatively small and be supported by scientific and other subject specialists that would not sit on the MPAB. The CPSAS recommends a maximum of 15 members with representation from the CPSAS, Highly Migratory Species Advisory Subpanel (HMSAS), Groundfish Advisory Subpanel (GAP), Salmon Advisory Subpanel (SAS), Habitat Committee (HC) and Ecosystem Advisory Subpanel (EAS), the three coastal states, and NMFS.
4. The MPAB would be responsible to inform the other AB's and the Council on marine offshore development.
5. The CPSAS believes the Four State Report's Option C with the above suggested modifications should be the preferred Council option.
6. The specialists would work with the MPAB to check present mapping accuracies, establish important past, present and potential future harvest areas, and collect and collate fisheries and environmental data.

Generating enough offshore wind energy electricity to meet the goals laid out by the present Administration and the States will require thousands of wind turbines, large numbers of power cables, and will occupy thousands of square miles of ocean. NOAA's AOA initiative also threatens to usurp valuable fishing grounds. The need to form a Council MPAB is immediate and important to every fishery on the West Coast.

PFMC
06/26/21