

GROUNDFISH ADVISORY SUBPANEL REPORT ON MARINE PLANNING

The Groundfish Advisory Subpanel (GAP) received a briefing on this agenda item from Mr. Kerry Griffin, Pacific Fishery Management Council (Council) staff and reviewed the briefing book documents for this agenda item and offers the following comments.

The GAP recognizes marine planning – and the advent of increasing offshore development – has been a growing concern among fishery sectors and managers for some time. President Trump’s push to develop offshore aquaculture areas, combined with the Biden Administration’s recent pressure to develop 30 gigawatts of offshore wind (OSW) energy by 2030 has the potential to conflict with fishing and scientific survey efforts and change the infrastructure dynamics at some ports. As the GAP noted in our [April 2021 future workload statement](#) (Agenda Item H.5.a, Supplemental GAP Report 1), “OSW energy development should not come at the cost of displacing existing fisheries and cause disruptions to the communities they support.”

More importantly, the GAP believes it is imperative the Council, the National Marine Fisheries Service (NMFS) West Coast Region and the Northwest and Southwest Fisheries Science Centers be fully engaged in any offshore development. This cannot be understated. As noted in several public comment [letters](#), fishing and seafood industry members count on the Council and NMFS to be our voice in ensuring industry has a voice in the process.

The Magnuson-Stevens Fishery Conservation and Management Act mandates the Councils, state, tribal and Federal partners work together to sustainably manage our fisheries. These fisheries depend on a lengthy time-series of established groundfish surveys. Displacement or interruption to these surveys could harm the science on which essential fisheries policy – harvest specifications and management measures, etc. – is based.

Clearly, neither the seafood industry nor the science/surveys should be harmed in the rush to develop the outer continental shelf, whether for renewable energy, aquaculture or other projects. Agencies outside the Council process and developers are rushing to develop and/or propose areas for offshore wind without input from the seafood industry and/or true engagement with the Council or NMFS. Incorporation of industry perspectives have, thus far, been largely ignored.

The Council process is the best, most transparent forum for industry involvement on these important developments, in contrast to the process used by other agencies for developments affecting our fisheries.

To that end, the GAP fully supports the formation of a small, ad hoc advisory body at this meeting, in line with Option C from the [Four-state Report on Marine Planning, Agenda H.5, April 2021](#) or a hybrid option. Several [letters](#), including those from the [Pacific Whiting Conservation Cooperative](#), the [West Coast Pelagic Conservation Group](#), the [West Coast Seafood Processors Association](#), and the joint letter by the [Midwater Trawlers Cooperative and United Catcher Boats](#) provide similar recommendations to support the formation of a small group to coordinate efforts and responses to offshore development, mapping and data integration efforts and to develop

reports and letters for Council consideration (or for emergency approval, if outside timelines do not afford normal Council schedules).

An ad hoc group, formed at this meeting and/or the September meeting would allow the Council to respond to projects in the immediate future, such as the “399” area in California and expected call areas off Oregon. The Council could transition this ad hoc body to a standing advisory body as the process moves forward.

The formation of this group with full support from the Council and staff, would send a clear and poignant message to the Bureau of Ocean Energy Management (BOEM) and offshore developers: **the Council and its component membership must be engaged in offshore development.** Furthermore, the GAP requests that the Council send a strong letter to BOEM, specifically, indicating the Council’s intent to be a material part of the offshore development discussion, especially regarding wind energy.

The GAP appreciates the [staff analysis](#) and consideration of the potential budgetary requirements for an advisory body to deal with offshore development. However, the GAP supports a smaller, nimble and industry-centric group to provide quick turnarounds on reports and suggestions for Council considerations. Inclusion of some state and Federal planning members would enhance the group, as noted by the industry letters.

Regarding the [Oregon Department of Fish and Wildlife \(ODFW\) Report](#) under this agenda item, the GAP appreciates the ODFW’s consideration of data layers that could be included for offshore mapping and siting processes. ODFW iterates the concerns many GAP members have had in the past regarding missing data, regulatory changes that affect fisheries, latency of some data, etc. For example, ODFW notes the large regulatory changes to the Rockfish Conservation Area in Oregon are not reflected in the current data layers. Areas closed by regulation for more than two decades may see renewed effort, but those areas will not be depicted in the current data layer catalog. This could lead developers and agencies to falsely conclude those areas ideal for offshore development.

It is imperative these data sets remain updated, with fishermen involvement, to be relevant to offshore developers or other agencies such as BOEM. As envisioned, the new group, with appropriate Council staff, could help coordinate and oversee these mapping efforts with other fishery management plan advisory bodies, the Council, and outside groups.

In addition to these data sets, the GAP notes our West Coast fisheries are extremely dynamic. Fishermen follow fish and move to avoid bycatch. The GAP is concerned that areas currently crucial to each fishery may shift, given the impacts of climate change and other variables. These are important stocks our communities depend on. We already compete with a wide variety of ocean uses and fishermen avoid both NMFS and non-NMFS closures. The siting of offshore development projects may add yet additional areas that fishermen cannot access.

In summary, the GAP generally concurs with the recommendations contained in the [Pacific Whiting Conservation Cooperative](#) public comment:

1. Make it clear 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, its process, and the seafood industry;
3. Establish a new, small, advisory body specifically tasked with addressing offshore development; and
4. Seek opportunities to collaborate with NMFS and other Federal and state agencies in a coordinated effort to ensure balance and coexistence between offshore development and Council-managed fisheries, including identifying and securing resources and staff to support these efforts.

PFMC
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