

GROUND FISH ADVISORY SUBPANEL REPORT ON MARINE PLANNING

The Groundfish Advisory Subpanel (GAP) received a presentation and information from Mr. Kerry Griffin, Pacific Fishery Management Council (Council) staff officer, and considered the documents under this agenda item. The GAP considered the five topics identified in the draft Supplemental Marine Planning Committee (MPC) report and offers the following comments.

The GAP generally supports the [MPC's report](#) and appreciates the careful consideration Committee members gave to the various wind energy projects.

Overall, the GAP reiterates our frustration with issues related primarily to offshore wind energy development, as noted in our [June 2021 statement](#) regarding future workload planning and the formation of the Marine Planning Committee. The Bureau of Ocean Energy Management (BOEM) process for inclusion of fisheries information prior to issuance or expansion of wind energy areas or call areas is particularly frustrating. Most critically, consideration of impacts to fisheries and coastal communities generally comes *after* areas are identified for wind energy projects. This runs counter to the Council process with which we are all accustomed. It is clear that through the Council process, industry's concerns and information are truly considered in a transparent process, based on fishery participant experience; the same is not true of the BOEM process. Industry provides information and communicates concerns to BOEM through their stakeholder outreach sessions; however, there is scant evidence that our concerns are taken seriously and not simply dismissed. The GAP expects the Council, especially with the addition of the MPC, will be able to gain a more meaningful engagement process with BOEM.

Similarly, the GAP appreciates the National Marine Fisheries Service's (NMFS) internal efforts to coordinate information and sharing of staff and resources across the West Coast Region and the Northwest and Southwest Fisheries Science Centers to coordinate offshore wind responses. The GAP believes this will be helpful as efforts to place turbines in the water off the West Coast become more prevalent. NMFS, especially through its essential fish habitat (EFH) mandates, has the authority to protect the natural resources on which the industry depends and conduct the research necessary to sustain fisheries.

The GAP stresses three points with regard to offshore wind overall:

- 1) BOEM should provide latitude and longitude coordinates in an accessible format (e.g., MS-Excel) for fishermen whenever a project is proposed. BOEM already provides shapefiles in formats for Geographic Information System work, but those formats do not work with the chart plotters fishermen use. Fishermen can convert an Excel spreadsheet for use in chart plotters made by various companies. This would enable fishermen to see exactly where their fishing trips overlap with proposed areas, which would also lead to more informed input to the Council and BOEM.
- 2) BOEM should consider more than just targeted fishing impacts when it does any environmental analysis for potential areas. Sometimes individual fishermen or fishing fleets behavior is more influenced by fish they are trying to *avoid*. Successful fishing is

- 3) derived by balancing impacts to incidental catch and bycatch while optimizing fishing for target species. Recognition of this type of fishing behavior needs to be included in any environmental analysis completed in which fisheries impacts are included, both relative to this project and to any future cumulative impacts analyses.
- 4) Regarding cumulative impacts, the GAP believes it is essential for BOEM to consider these in its analyses. Project-by-project analyses and approval by BOEM exclude the regulatory requirements fishermen adhere to every day; other state and Federal closed areas (for resource and habitat protection); and closed areas due to other offshore development projects (this is not an exhaustive list). BOEM should be required to conduct a comprehensive cumulative effects analysis for the West Coast.

Morro Bay 399 Call Area

The GAP recognizes that BOEM sought comments related to the east and west extension areas of the original Morro Bay call area. The [MPC letter](#) does a sufficient job of identifying concerns with extending the areas beyond the original call area.

Humboldt Wind Energy Area (WEA)

The GAP appreciates the [letter proposed by the MPC](#) for comments relative to the Humboldt Offshore Wind Energy area. Understanding BOEM's process for identifying which data should be included in an environmental assessment for site characterization is difficult. The GAP would like to see detailed information regarding smaller, discrete areas related to fishing impacts, actual placement of anchors and turbines or cables, but acknowledges some of that information would come later in the BOEM leasing process.

However, the GAP agrees that BOEM should identify current and historical state and Federal fisheries, both sport and commercial, that have operated in the Humboldt WEA. Fishermen on the GAP said the WEA appears to encroach upon designated EFH areas, productive sablefish fishing areas, and vital groundfish areas important to longliners, sablefish pot fishermen, and trawlers. It is also a transitional area for sablefish as they mature and migrate.

Vandenberg Air Force Base pilot projects

The GAP agrees with the [letter to the California State Lands Commission](#) regarding the two demonstration projects off Vandenberg Air Force Base and realizes the process for including comments relative to these projects are different than comment submissions to BOEM. To that end, the GAP requests noting this area is a primary fishing area for recreational fishermen targeting rockfish, particularly vermilion rockfish. Fishermen already are avoiding several regions due to state Marine Protected Areas. Sport fishermen noted that excluding them from this area would push them into habitat frequented by copper rockfish.

Grays Harbor Wind

GAP members noted Grays Harbor Wind (GHW) representative Alla Weinstein reached out to several industry groups as part of the company's development of a submission to BOEM for an

unsolicited lease request. The area proposed, in the Quinault Indian Nation Usual and Accustomed fishing area, covers productive sport and commercial fishing grounds for state, Federal, and tribal-managed fisheries.

The GAP recognizes this project is in the preliminary planning stage; however, given that the preliminarily proposed area covers one of the most productive fishing grounds off Washington (encompassing numerous recreational and commercial fisheries) the GAP is concerned about the developer's intent to use the unsolicited bid process to gain approval to move forward with the project. Because of our experience with the Principle Power project (an unsolicited bid) previously planned off Coos Bay, Oregon, and shared experiences from fisheries in other regions, the GAP is concerned that the unsolicited bid process provides a short cut to gaining BOEM approval because it puts the developer in charge of outreach and siting efforts rather than the more comprehensive and, potentially, more inclusive BOEM offshore wind planning process.

Therefore, the GAP recommends the Council consider indicating to BOEM its preference that BOEM not use the unsolicited bid process in relation to GHW. The [New England Fishery Management Council made a similar request](#) to BOEM in January 2020, noting: "The Council also agreed that a comprehensive planning process is preferable from the perspective of engaging diverse stakeholders and assessing tradeoffs between areas, as compared to the unsolicited bid process."

PFMC
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