



Pacific Fishery Management Council

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Marc Gorelnik, Chair | Charles A. Tracy, Executive Director

September 13, 2021

California State Lands Commission
Attention: Eric Gillies
100 Howe Ave., Suite 100-South
Sacramento, CA 95825-8202

CSLC File Ref: A2181; A2222

Dear Mr. Gillies:

The Pacific Fishery Management Council (Council) appreciates the opportunity to comment on the California State Lands Commission (CSLC) Draft Preliminary Environmental Assessment (PEA) in response to two separate applications submitted by CADEMO Corporation (CADEMO) and IDEOL USA Inc. (IDEOL) for proposed offshore wind (OSW) energy demonstration projects, collectively referred to as the “Vandenberg Offshore Wind Energy Projects” (Projects).

The Council is charged with sustainably managing West Coast fisheries, which includes conserving and enhancing habitats in support of sustainable fisheries and managed species. The Council is one of eight Regional Fishery Management Councils established by the Magnuson-Stevens Fishery Conservation and Management Act of 1976 (MSA). The Council develops management actions for Federal fisheries off Washington, Oregon, and California, and is required to achieve optimum yield for public trust marine resources. Optimizing the yield of our nation’s fisheries requires safeguarding these resources, their habitats, and the fishing communities that rely on their harvest.

Per its terms, the PEA is intended to serve as an early foundation of information to feed into the State’s Environmental Impact Report (EIR) process should CSLC decide to continue evaluation of the proposed Projects. The Council recommends CLSC consideration and evaluation of the following:

- The areas encompassed by the Projects are within essential fish habitat for groundfish, salmon, highly migratory species, and coastal pelagic species, including krill.
 - The Project areas appear to be in close proximity to Rocky Reef and Kelp Canopy Habitat Areas of Particular Concern (HAPC). HAPC represent high priority areas for conservation, management, protection, or research and are important for healthy ecosystems and sustainable fisheries. The Council is of the opinion that ocean energy structures may be incompatible with rocky habitats and HAPCs, and believes that these areas warrant careful impacts analysis and consideration as to whether OSW planning and development would be compatible with these important physical and biogenic habitat features.
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- Commercially and recreationally important fish stocks managed under the Council's Groundfish, Coastal Pelagic Species, Salmon, and Highly Migratory Species Fishery Management Plans are harvested in the area. Additionally, a number of State-managed fisheries operate in the area. The Project areas are situated in California Department of Fish and Wildlife (CDFW) blocks 643 and 644. Based on data provided by CDFW, over 80 commercially important fish stocks were harvested in those blocks between 1995 and June of 2021. Additional information that reflects recreational catch from those blocks will allow an analysis of the importance of the Project areas to dependent fishing communities.
- The Project areas are situated adjacent to the Vandenberg State Marine Reserve and are in close proximity to the Point Conception State Marine Reserve. The Council **recommends** that CSLC conduct a cumulative effects analysis, taking into account future state and Federally-regulated wind energy proposed areas (including consideration of all areas in the region closed to fishing) on all commercial and recreational fisheries, fishing communities, and impacts to domestic seafood production (including port-based fishery-specific facilities and related services).
- The PEA states that transmission cables will be buried to a depth of five feet. However, this may not be an adequate depth to avoid cables becoming unburied. The Block Island OSW project off Rhode Island originally buried transmission cables at a depth of 4-6 feet below the seafloor. After sediment shifts exposed sections of the cable, the operator of the project reburied the cables at a depth of 25-50 feet. The applicants of the demonstration Projects should consider burying cables deeper under the sea floor to account for the sea state in and around Point Arguello.
- We appreciate the PEA including Appendix F - Commercial Fish Landings for Santa Barbara and Morro Bay Areas. We suggest expanding the range of years to include years prior to 2019, to paint a more accurate picture. California's market squid fishery landed 15,228 short tons (st) during the 2019-20 fishing season, which represents the lowest landing total since the 1999-2000 fishing season. However, that gives an incomplete picture of commercial squid landings. For example, 104,000 st and over 61,000 st were harvested in the 2014-15 and 2017-18 fishing seasons, respectively.
- The CADEMO Project seeks to develop a wind demonstration project. The IDEOL Project seeks to develop an OSW electrical generation pilot project. More information on the goals and the research endeavors, methodologies, and plans would be helpful in analyzing the Projects' benefits. In short, the Council suggests that the following questions be addressed: How will two different types of projects in shallow water help inform floating OSW projects in much deeper water and much further offshore? Are the applicants intending to pursue full scale commercial wind projects in the future? What are the plans for conducting research and reporting out on the findings? Additionally, the Council recommends that should these two projects move forward, the CSLC define what the duration of a demonstration project would be for projects with lifespans of 25 and 30 years.

Future Engagement and Consultation with the Council

The Council recently convened an ad hoc Marine Planning Committee (MPC) composed of members from its existing advisory bodies to directly engage on ocean energy development and other emerging ocean industries. The Council, through the MPC, intends to stay fully engaged in the CSLC's process going forward. The Council appreciates CSLC's participation in the recent MPC meeting. We look forward to working with CSLC to ensure that fishery and fish habitat are fully considered throughout the process.

Please note that the Council's meeting schedule and opportunities for its advisory bodies to inform the Council do not necessarily align with public comment periods of other public processes. We would appreciate your consideration of our comments if issues should arise outside the public comment window.

The Council looks forward to assisting CSLC in reviewing its EIR document as it pertains to the CADEMO and IDEOL Projects, as well as in finding development options that minimize impacts to ecological and fisheries resources and in achieving the long-term goal of responsible development of this industry.

Sincerely,

A handwritten signature in black ink that reads "Marc Gorelnik". The signature is written in a cursive, flowing style.

Marc Gorelnik
Pacific Council Chair

KFG:acl

Cc: Pacific Council Members
Ad Hoc Marine Planning Committee
Ms. Jennifer Mattox, CSLC