

GROUND FISH ADVISORY SUBPANEL REPORT ON MARINE PLANNING

Mr. Kerry Griffin, Pacific Fishery Management Council, provided the Groundfish Advisory Subpanel (GAP) an overview of the Marine Planning Committee (MPC, Committee) draft report and recent meeting. The GAP appreciates the Committee's report and offers the following comments.

General comments on offshore wind energy

While the Committee covered several issues, the GAP's primary concern remains the potential for offshore wind (OSW) to displace fisheries and potentially disrupt fishing grounds. In addition to the direct impact of lost grounds, OSW also could disrupt shoreside support systems when transmission cables are laid and limited port area is devoted to wind components or support vessels. GAP members also voiced continued frustration with the Bureau of Ocean Energy Management (BOEM) outreach and engagement plans that, as the GAP has noted before ([April 2021](#), [September 2021](#)), seem more like "check the box" exercises with no real consideration of the seafood industry's concerns.

Specific to activities in California, fishermen also noted that it appears a limited number of fishermen/fisheries groups have been contacted in advance of important meetings related to siting in their areas (for example, it was noted that trawlers were not aware of nor attended a recent meeting about the Humboldt Call Area). The exclusion of some members of the fishing community, though likely unintentional, has been frustrating. There is broad interest about this important topic across multiple fishing and processing interests. Coordinated outreach is critical to ensure offshore energy development efforts engage with recreational and commercial fishery participants. The GAP understands California state agencies and BOEM will continue to hold port meetings and do more outreach to the fishing industry. The GAP encourages the Council, MPC, and fishery participants to stay engaged.

The MPC also noted the apparent lack of communication regarding the Humboldt Wind Energy Area (WEA). Again, BOEM does not appear to understand the gravity of the seafood industry's concerns. The Humboldt WEA contains significant amounts of fishing grounds that would be lost. Loss of fishing opportunities in this area would cause processors to lose a large volume of fish that is currently delivered to Eureka. GAP members also noted that in port meetings, BOEM said it had no jurisdiction over whether the cables between the turbines or the transmission cable(s) to shore would be buried or just laid on the bottom. The footprint of a wind energy area itself is enough of an issue, but not addressing the transmission lines between the OSW devices and to shore adds to the potential lost fishing opportunity as well as potential hazards to the environment.

It is clear that better engagement with fishery participants is needed. Therefore, the GAP suggests that the MPC develop a list of fisheries groups that could be provided to BOEM and OSW developers. The GAP stands ready to support development of a contact list (that would include, at a minimum – Fishermen's Marketing Association, United Catcher Boats, Pacific Whiting Conservation Cooperative, Midwater Trawlers Cooperative, Fishing Vessel Owners Association, West Coast Seafood Processors Association, and the Humboldt Bay Fishermen's Marketing

Association). The MPC could also be tasked to work with BOEM on ways to improve BOEM outreach and contact with the fishing community; for example, while BOEM maintains email distribution lists it appears these tend to be used for generic process updates and not to announce specific siting-related meetings. Development of a BOEM-Pacific Council listserv could provide for coordinated distribution of important information to fishery stakeholders.

Related to [NMFS Report 1](#), the GAP supports the formation of a team to coordinate NMFS' engagement in offshore energy. The GAP hopes this team will encourage and facilitate proactive interagency work between the Council, NMFS, and BOEM to protect our fisheries, habitat, and fishing grounds. The GAP envisions that this NMFS engagement process will enable the Science Centers and Region to be more involved in the BOEM/Department of Interior OSW siting and environmental review processes in a more comprehensive manner.

Regarding the 1300-meter outer depth limit for wind energy device placement, the GAP, like the MPC, supports the analysis of areas deeper than 1300 meters for inclusion in call areas or wind energy areas. Depth limitations should not be held to current technology only; OSW technology development is proceeding rapidly. These artificial limits could serve to deter interest in developing new ways to place devices in deeper waters that could avoid interactions with most of the managed fisheries on the West Coast.

Similarly, as the Committee states in its report, the GAP believes it's imperative to study the cumulative impacts of multiple projects and appreciates BOEM's looking for solutions to do this earlier in the review process.

The GAP also fully supports the Council's [draft letter to BOEM](#) (attachment 1 under this agenda item) regarding potential Oregon Call Areas.

USCG Pacific Port Access Route Study (PAC-PARS)

The U.S. Coast Guard has requested comments about its Port Access Route Study for the Pacific Coast, especially in light of the increasing interest in offshore development. The GAP supports the MPC's suggestion of sending a brief letter to the USCG, which could include prior Council letters relating to navigation offshore and potential wind energy projects. In addition, the GAP suggests the letter note the following:

- That offshore energy devices placed directly in front of ports could make it difficult for fishermen to circumvent those devices and safely enter port. For example, based on the current OSW siting proposed, vessels entering Fort Bragg, California, from the northwest, would be unable to make the turn safely in bad weather.
- Any shipping lanes between offshore energy projects and shore, noting any anchorages, should be included in the study.

Policy document for offshore wind

The GAP supports the development of a policy document as outlined in the MPC report. This could be very helpful as a number of projects are competing for offshore development or changes that could affect Council-managed fisheries. For example, since the Committee met, the proposed

Chumash National Marine Sanctuary designation and Morro Bay Wind Energy Area have been announced. Often, these announcements have comment deadlines that do not encompass Council meetings. A policy document would enable the Council to have detailed, pertinent information that could be included in communications via the Council's quick-response process.

This Council action would also be responsive to the request made by the Responsible Offshore Development Alliance (RODA), and its West Coast members, in the [RODA public comments letter](#). The GAP fully supports the thoughtful comments and recommendations made by RODA. Given their experience in other fishery management regions, RODA has proven to be a strong partner with the fishing industry and effective advocate for responsible offshore development. The GAP recommends the Council carefully consider the information and recommendations in the RODA letter and act accordingly.

PFMC
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