

SALMON ADVISORY SUBPANEL REPORT ON MARINE PLANNING

The Salmon Advisory Subpanel (SAS) heard a report about the Marine Planning Committee (MPC) on the United States Coast Guard's Port Access Route Study, the National Oceanic and Atmospheric Administration's (NOAA) Aquaculture Opportunity Areas Programmatic Environmental Impact Statement, offshore wind planning activities, and other items. The SAS notes that this effort has occurred under a compressed time frame and wholly supports the MPC's efforts to better align Council interests with these ongoing regulator processes.

The SAS has reviewed the draft MPC report as well as the draft Pacific Fishery Management Council letter to the Bureau of Ocean Energy Management (BOEM, [Agenda Item C.2, Attachment 1](#)). The SAS shares the overarching concerns of the MPC members that the BOEM process for designation of Call Areas does not go far enough in considering the impacts to fisheries and is supportive of the Council's efforts to better align the BOEM and Council processes.

- Regarding impacts to fisheries activities:
 1. Undersea cables: Waiting until a lessee has been identified and a specific design proposal is in place to determine what the potential for impacts from undersea cables is too late for these considerations to have a meaningful impact on the design and siting. Multiple fisheries, including in-water and groundfish could be displaced depending on the composition and siting of infrastructure on the bottom and BOEM should better understand the uses at all points in the water column.
 2. Identifying fishing grounds: The SAS is also concerned about the use of automated identification system (AIS) data to extrapolate impacts to fisheries. Many commercial vessels are not required to use AIS, and many commercial and recreational fisheries who do use AIS do not broadcast while fishing to protect the location of the most productive grounds. BOEM needs to seek out additional sources of information so that entire fishing sectors are not excluded from consideration. An example is the mapping exercise conducted in the Humboldt Call Area by California fishing interests and the Ocean Protection Council, which accounted for both historic and current fishery practices. Similar maps have also been developed in Oregon which BOEM should investigate.
- Regarding ecological impacts: The SAS is concerned that the Call Area process fails to take into account the potential for fish aggregation by in-water structures and exclusion areas immediately surrounding them. While the SAS understands that specific exclusion areas would depend on the final lessee and design on the wind farm, we are concerned that the current process provides no opportunity to comment on these issues until it would be too late to be meaningful or provide any protection to fishing opportunities.