



Pacific Fishery Management Council

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Marc Gorelnik, Chair | Merrick J. Burden, Executive Director

January 25, 2022

LCDR Sara Conrad
United States Coast Guard
Pacific Area (PAC 544)
Coast Guard Island
Alameda, California 94501

Dear Lieutenant Commander Conrad:

The Pacific Fishery Management Council (Council) appreciates the opportunity to provide comments on the United States Coast Guard (USCG) Port Access Route Study (PARS), designed to evaluate safe access routes for the movement of vessel traffic to or from ports or places along the western seaboard of the United States.

The Council manages fishing activities in the United States West Coast Exclusive Economic Zone, from 3 – 200 miles offshore. These fisheries include commercial, recreational, and Tribal fisheries for salmon, groundfish, coastal pelagic species, and highly migratory species. The Council operates in accordance with Magnuson-Stevens Fishery Conservation and Management Act (MSA) mandates and other applicable law to sustainably manage fishery resources.

On November 10, 2021, the Council's Ad Hoc Marine Planning Committee (MPC) was briefed by Mr. John Moriarty, who provided the MPC with a thorough overview of the PARS initiative. The MPC subsequently recommended that the Council develop brief comments, and to enclose prior letters describing the Council's concerns about offshore development activities that may impact fishing vessel safety and navigation, or other resources under Council jurisdiction.

The Council recommends keeping vessel fairways outside of the areas established by the Council that are closed to bottom-contact fishing activities. These areas are identified as Essential Fish Habitat Conservation Areas (EFHCAs) and are designed to protect especially important habitats for Pacific Coast groundfish and to provide other ecosystem services. Maps and associated information on EFHCAs are available on the National Oceanic and Atmospheric Administration (NOAA) Northwest Fisheries Science Center Fisheries Research and Monitoring [Data Warehouse](#) or by contacting Mr. Kerry Griffin of our Council staff (Kerry.griffin@noaa.gov; 503-820-2409).

The Council further recommends keeping port access unobstructed by physical structures that require detours for vessels exiting and entering such ports. Offshore energy structures placed directly in front of ports could make it difficult for fishermen to circumvent those structures and safely enter or exit ports. For example, based on a current offshore wind energy siting proposed, vessels entering Fort Bragg, California, from the northwest, would be unable to make the turn

safely in bad weather. In addition, any shipping lanes between offshore energy projects and shore, noting any anchorages, should be included in the study.

Attached are three letters related to offshore wind energy and aquaculture installations, to assist the USCG in understanding the Council's concerns about the potential for such installations to affect fishing vessel safety and navigation, as well as concerns about impacts to designated habitat protection areas (EFHCAs).

In conclusion, we appreciate the effective communication and outreach efforts by the USCG, and look forward to continuing dialog. If you have any questions related to the PARS initiative or other marine planning related issues, please contact Kerry Griffin (see above contact information) of my staff.

Sincerely,



Marc Gorelnik
Pacific Council Chair

KFG:rdd

Cc: Council Members
Ms. Susan Chambers
Mr. Mike Conroy
Mr. Chris German
Dr. Jim Seger

Enclosures:

PFMC letter to the Bureau of Ocean Energy Management (BOEM) on oil and gas rig decommissioning activities

PFMC letter to BOEM on offshore wind energy planning off Morro Bay, California, East and West Extensions

PFMC letter to BOEM on offshore wind energy planning off Humboldt Bay, California