ECOSYSTEM WORKGROUP REPORT ON MARINE PLANNING

During its March 8-9 meeting, the Ecosystem Workgroup (EWG) received a briefing on Marine Planning agenda items. The EWG would like to acknowledge and thank the Ad Hoc Marine Planning Committee (MPC) for their comprehensive review of the offshore wind development process, the NOAA Aquaculture Opportunity Areas Atlas, and the synopsis of the America the Beautiful Initiative in the <u>MPC Report 1</u>. With regard to the various draft policy guidance documents under Council consideration at this meeting, we remind the Pacific Fishery Management Council (Council) that Recommendation 2.c from the September 2021 Climate and Communities Core Team recommendations for Council action was that any Council guidance document on offshore non-fishing activities include a statement on "the role of greenhouse gas emissions in climate change and related implications for West Coast fisheries."

The EWG provides the following additional comments on the recently announced draft offshore wind call areas in Oregon, so that they may be taken into account if the Council decides to provide a formal letter of comment on those areas to the Bureau of Ocean Energy Management (BOEM):

- Offshore wind installations are likely to affect fisheries as they are operating now and into the future. Climate variability and change will affect species distribution, and in turn where our fisheries operate and how fisheries interact with both wind installations and non-target and protected species. We appreciated Section 4.2 of the ecosystem status report, which provides historical information on trawling activity overlaid with identified and proposed wind energy areas. However, we note that simply quantifying where fishing effort is occurring today or has occurred in recent years may underestimate the socioeconomic effects of any closures due to: 1) eroding the portfolio of fishing location choices, and 2) potential additional effects of moving and concentrating fishing effort outside closed areas.
- It will be particularly important to evaluate how shifting fish stocks, protected species, and fisheries may influence impact of wind project siting under current and future distributions in any National Environmental Policy Act analysis on leases for wind energy installations, since leases are likely to be held for long enough periods of time to include decades where we are more certain of the effects of climate change on our ecosystem.
- There are many ongoing <u>marine surveys</u> critical to informing management of fishery management plan (FMP) species in the California Current Ecosystem (Gallo et al. 2022). To avoid disrupting time series, wind installation planning should not occur in locations where samples are collected from fixed, permanent locations. For example, we appreciate BOEM's exclusion of the Newport Hydrographic Line from the draft call areas off Oregon. As such, planning should include locations of historical survey stations whenever possible. On average ~6 percent of groundfish survey hauls occur within the Oregon call areas, and for some species in some years, well over 10 percent of survey biomass is caught in these areas. In addition to spatially fixed surveys, the sample locations of other marine surveys can vary temporally, such as the coastwide coastal pelagic species survey which conducts surface trawls at locations that vary interannually. For these temporally dynamic surveys, installation planning should be cognizant of regions that are sampled and attempt to avoid locations with a high probability of sampling.

• BOEM's analyses of developer surveys in support of offshore wind farm development, and in support of leasing ocean space and installation of offshore wind equipment, should include analyses of the potential effects of filling any wind energy areas with wind turbines, to give the public a comprehensive picture of the reasonable suite of foreseeable future actions associated with wind energy area leasing and development.

Ultimately, the EWG recognizes that we cannot mitigate the effects of climate change on the environment without reducing carbon emissions and we support the role that offshore wind energy can play in the nation's portfolio of clean energy. However, the EWG is concerned that developing offshore wind off the U.S. West Coast could have negative cumulative and unforeseen effects on the ocean environment and on fisheries and fishing communities without sufficient planning. We are also concerned that there is no overarching planning body or guiding plan on how best to weigh the negative environmental effects of wind energy installations in different locations within the ecosystem against the positive environmental benefits that could come from energy generated by those installations rather than from fossil fuels.

Similarly, it would be beneficial for natural resource managers and stakeholders if BOEM were to complete or support a lifecycle analysis for offshore wind energy projects. It is unknown whether turbines will be manufactured, transported, installed and maintained using renewable energy sources, or if these components will depend on fossil fuels. What is the net renewable energy benefit of offshore wind? How does this play into the potential negative effects on West Coast fishery displacement or elimination?

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