

GROUND FISH ADVISORY SUBPANEL REPORT –  
MARINE PLANNING

The Groundfish Advisory Subpanel (GAP) was briefed by Ms. Susan Chambers (Ad-Hoc Marine Planning Committee [MPC] co-chair) about recent activities related to Offshore Wind (OSW) Development on the west coast, recent Bureau of Ocean Energy Management (BOEM) meetings, and the MPC/BOEM meeting that occurred on March 4, 2022. The GAP also reviewed briefing book materials for this agenda item, including the [Ecosystem Workgroup \(EWG\) Report 1](#), the [Habitat Committee \(HC\) Report 1](#), and the [Supplemental Groundfish Management Team \(GMT\) Report 1](#). The GAP provides comments related to the Ecosystem Workgroup (EWG) and Habitat Committee (HC) reports, OSW development, and the BOEM process.

The EWG report includes the policy guidance document the Pacific Fishery Management Council (Council) directed the EWG to develop based on the former Chapter 5 from the Fishery Ecosystem Plan (FEP). The GAP thanks the EWG for this concise and valuable document that details the types of information and considerations that **must** be analyzed relative to offshore development activities that will impact Council-managed fisheries, their habitat, and the Federal and state research that is fundamental to sustainable management. The GAP supports the EWG recommendation that the Council transition ownership of this document to the MPC and supports including information from this policy guidance in all Council documents related to marine planning, especially OSW. Similarly, the GAP thanks the HC for their analogous document that conveys similar information with a specific focus on habitat considerations. The HC document also provides critical considerations that **must** be part of any analysis related to the potential impacts of offshore energy development that will impact the habitats of Council-managed fisheries. These documents cannot be ignored and should be the vanguard of any Council response to offshore development activities.

Related to OSW and BOEM, the GAP has numerous concerns. However, before addressing them, the GAP thinks it important to call out the tone and content of the GMT's report on this topic because it appears unique relative to typical GMT advice and analytical documents. The GMT report is a clear and urgent alarm about the severe impacts on Council-managed fisheries, fishery-dependent communities, and research activities vital to sustainable fishery management if OSW is not developed responsibly. The GAP welcomes this new tone and thanks them for their detailed recitation of concerns and remedies. Their comments cannot be ignored.

The GAP has stated our concerns about OSW and the BOEM process related to offshore development in several statements – [March 2021](#), [April 2021](#), [June 2021](#), [September 2021](#), and [November 2021](#). Therefore, for the sake of brevity, the GAP provides a distillation of our continuing concerns with the OSW development process as it is currently being conducted.

The BOEM process is diametrically opposed to the collaborative stakeholder-driven, bottom-up processes used to manage federal and state fisheries on the west coast. Specifically, in regards to the recently announced Oregon Call Areas, there is no evidence that the numerous meetings held with fishery participants and community representatives had any effect on the design of the Call Areas; nor does it appear that direct input from state managers about data incompleteness and mis-interpretation were heeded. The proposed Oregon Call Areas are sited directly atop valuable and

productive grounds for whiting, sablefish, pink shrimp, Dungeness crab, and numerous other critically important commercial and recreational fisheries. The proposed Oregon Call areas also overlay vital habitats for Council-managed fisheries (including endangered salmonids), seabirds, and marine mammals. When asked why environmental and socio-economic impacts were not analyzed prior to declaring the proposed Call Areas, BOEM responds that environmental impact analyses are not conducted during this stage of the process. It is unfathomable that a management agency can propose an action without performing even rudimentary impacts analyses, especially when it is plainly obvious that development activities in the proposed areas will have detrimental, if not existential, impacts on fisheries and fishing-dependent communities.

In addition to the direct displacement of well-managed fisheries, the ripple effects are also clear. When fishing grounds are lost, fishermen are forced to fish in concentrated areas causing gear conflicts and creating management problems. Forcing fisheries into less productive grounds increases operational costs because more time is spent catching fewer fish. More time on the grounds increases safety risks, which are already heightened because of the navigational obstacles presented by OSW placements. Irresponsible offshore development displaces productive fisheries, increases gear conflicts, reduces profitability, and makes fishermen less safe.

As highlighted by the GMT, the proposed Oregon Call Areas are also likely to impact Federal and state research activities that are the foundation of sustainable fisheries management. Rough estimates indicate that more than 10 percent of research survey catches for several significant groundfish stocks would be lost because historical research transects are disrupted. Negatively impacting these important fishery data time series will increase stock assessment uncertainty necessitating more conservative management actions that reduce harvest levels. Harm is multiplicative – less production, higher costs, greater conflicts, less safety, combined with reduced harvest opportunities because of scientific uncertainty. Recreational and commercial fishermen, coastal communities, and consumers are worse off because OSW is not pursued responsibly.

Moreover, when the above impacts from the proposed Oregon call areas are considered within the larger context of other west coast offshore development activities, it is clear that cumulative impacts – to fisheries, coastal communities, habitats, protected resources, and fisheries research – will occur. These broad impacts necessitate comprehensive analysis in a Programmatic Environmental Impact Statement. Initial responses from BOEM appear to indicate that consideration of the cumulative impacts of regional impacts from offshore development is not standard operational procedure. Again, this is in stark contrast to how fisheries are managed and, to the GAP, unacceptable.

In summary, this is important and the Council should state it understands and shares these concerns. Before OSW development proceeds, more time, more data, more meaningful outreach, more environmental and economic analyses, and more Council engagement are urgently needed.

PFMC  
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