



Pacific Fishery Management Council

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

26 May 2022

Brian K. Penoyer
Rear Admiral, U.S. Coast Guard, Commander
Eleventh Coast Guard District
Bldg. 50-2, C.G. Island
Alameda, California 94501-5100

Re: United States Coast Guard Pacific Coast-Port Access Route Study

Dear Rear Admiral Penoyer:

The Pacific Fishery Management Council (Council) appreciates the opportunity to provide comments on the United States Coast Guard's (USCG) *Vessel Traffic Assessment: Near Point Mugu, San Francisco Bay, Humboldt Bay, and Morro Bay, California*, which is part of the USCG's Pacific Coast-Port Access Route Study (PAC-PARS). Most of the questions in the request for comments are specific and detailed in nature, and best answered by individual fishing participants who use the four areas described in the notice. However, the Council would like to provide some overarching comments in support of the PAC-PARS initiative.

We have encouraged fishing stakeholders to comment directly to District 11 via the Federal Register comment portal, and hope to help generate some of the detailed information requested. We also wish to express our appreciation for the USCG District 11 outreach efforts, particularly for Mr. Tyrone Conner joining our Marine Planning Committee meeting on April 5, 2022 to present the PAC-PARS information.

The Council is responsible for managing Federal fisheries off the United States Pacific Coast. This includes establishing harvest quotas, seasons, gear restrictions, closed areas, and numerous other elements related to fisheries management. The Magnuson-Stevens Fishery Conservation and Management Act (MSA) and implementing regulations guide our work. The MSA also mandates development of a set of [National Standards \(NS\)](#), which apply to the Council's management decisions. Among these are two in particular that relate to the PAC-PARS effort. NS10 (Safety at Sea) directs the Council to develop conservation and management measures that, to the extent practicable, promote the safety of human life at sea. NS8 (Communities) requires the Council to develop conservation and management measures that provide for sustained fishery participation by fishing communities and minimizes, to the extent practicable, adverse economic impacts on such communities. The Council is very interested in ensuring that development or changes in Fairways and Traffic Separation Schemes for vessels and/or International Maritime Organization recommended routes account for the importance of safe transit and navigation for fishing stakeholders as well as potential impacts to fishing-dependent coastal communities.

The Council is very concerned about the potential impacts of offshore development on the fishing industry and fishing-dependent communities. Commercial and recreational fishing activities are highly regulated, and in many cases are restricted spatially in terms of where they can fish. For example, the Council has implemented numerous fishing closures: bottom trawling, all bottom contact gear, non-trawl gear closures, salmon exclusion zones, yelloweye rockfish conservation areas, etc. Fishing activities are also affected by vessel transit and shipping lanes, marine mammal protection measures, and other factors. Our concern is that the secondary effects of offshore development could exacerbate the spatial restrictions already faced by fishing participants.

Question 27 in the notice asks, “Do you think the Coast Guard should create designated fairways, traffic separation schemes for vessels, or exclusion/restricted areas around wind farms?” Our response is yes, if such efforts would increase safety and would minimize impacts to fishing and coastal communities, then the Council is supportive of that approach.

Question 28 asks, “Would you prefer wind farm exclusion/restricted areas where you can navigate anywhere outside of the wind farm, or would you prefer to restrict your navigation inside designated coastwise fairways and traffic separation schemes through the wind farms?” Generally, the Council supports maximum flexibility in navigation through and around wind farms so fishermen can access preferred fishing grounds without having to transit around large areas unnecessarily. This could be particularly important during times of inclement weather when a more direct route to a port entrance is necessary. In other words, if it can be done safely, the ability to transit through or fish within a wind farm is preferable. Ideally, wind farms would be located in areas of very low fishing activity. However, if wind farms are established off the Pacific Coast, we support the ability to safely transit through wind farms as well as around them.

In summary, the spatial extent of offshore wind planning areas off the Pacific Coast are very large relative to other navigational barriers and would certainly impede fishing and navigation. We support the efforts of the USCG and encourage consideration of required safety corridors, project configuration, and other elements that would maximize safety and minimize disruption to transit and fishing activities. Thank you again for the opportunity provide comments. If you have any questions, please contact Mr. Kerry Griffin on Council staff (Kerry.griffin@noaa.gov).

Sincerely,



Marc Gorelnik
Council Chair

KFG:ael

Cc: Council Members
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