COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON MARINE PLANNING

The Coastal Pelagic Species Advisory Subpanel (CPSAS) met by webinar on September 1 to discuss multiple items on the Pacific Fishery Management Council's (Council) September agenda. In this discussion, the CPSAS determined we had several general and specific points on the draft Guidance Document (Agenda Item C.4, Attachment 1) we wished to comment on.

First, we wish to complement the Marine Planning Committee and particularly the Co-Chairs, Council staff, and the Council for the manufacture of the Guidance Document. We believe the document creates an identifiable and coherent structure of the Council's stated concerns and efforts to protect our commercial and recreational fisheries, Essential Fish Habitat (EFH) and our California Current Ecosystem (CCE).

As CPS fishers, processors, distributers of live bait, and as concerned citizens, we are apprehensive about the lack of essential ecosystem research resulting in a dearth of analytical data on what effects may occur to the CCE, fish stocks, and protected species with the advent of offshore wind energy (OSW). This research is critical and essential to establish confidence in the Bureau of Ocean Energy Management (BOEM) offshore wind (OSW) environmental review process.

A specific CPS example: What effect, and at what scale, will the presence of OSW wind turbines, and their wind wakes, or other atmospheric or hydrological alterations have on CPS species that also serve as forage? Will Pacific sardines that swim offshore to spawn, and their larvae that depend on ocean transport to move their recruitment inshore to their nursery zones, revise their primal behavioral patterns due to interaction with wind farms? Will energy deficits on the leeward side of turbines disrupt the ocean transport process for larvae?

Additionally, there has been no cohesive effort or a stated plan to collect and collate credible economic data from our seafood industry and fishing communities. Yet BOEM has already announced plans for compensatory mitigation without any known data or analytical basis.

EFH protective measures are in place for many static EFH areas, but very little is even known about the resiliency of the dynamic liquid portion of ocean habitat that sustains all marine dependent species. We know removal of wind energy has some degree of hydrological effect. Will that reshape ecological function to a material degree?

We herein reference several specific edits we recommend be included in the Guidance Document prior to the Council finalizing at this meeting that we believe are necessary to help protect the productivity of the CCE and the viability of our coastal communities. (***Recommended changes, italicized, in bold print, and underlined***)

1. Page 1: **Objectives**: describe the potential effects of OSW on affected resources (including habitats, ecosystem, fisheries, and fishing-dependent coastal communities);

Identify, ***the needs for both missing existing data, (e.g.,)[1] and currently absent requisite research*** and the associated analysis to assess effects ***to CCE productivity, and economic impacts to coastal communities.***

2. Page 3: Ex-vessel value does not accurately reflect downstream benefits and economic impact. ***Extensive individual community economic study is necessary to understand the degree of community dependence on commercial and recreational fishing***.
3. Page 6: Potential impacts to habitats and species from offshore development activities ***should be analyzed through an independent and comprehensive NOAA administered NEPA process that utilizes both a Programmatic EIS(PEIS) and Site/Project EIS. The PEIS must be administered prior to leasing and estimate cumulative impacts.*** Other applicable laws include, but are not limited to:...
4. Page 7: Expectations for ***research***, analysis, monitoring, and avoiding impacts to fisheries and habitats.

PFMC
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(example)[1] Emergence of Large-Scale Hydrodynamic Structures Due to Atmospheric Offshore Wind Farm Wakes: Effect of Floating Offshore Wind Turbines on Atmospheric Circulation in California | Integral Consulting (integral-corp.com)