

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON MARINE PLANNING

The Coastal Pelagic Species Advisory Subpanel (CPSAS) reviewed the Marine Planning Committee's (MPC) ([G.3.a, MPC Report 1](#)) (the Report) in the March 2023 Briefing Book. This was largely focused on the February 2, 2023 MPC meeting with the Bureau of Ocean Energy Management (BOEM), the Oregon Department of Fish & Wildlife (ODFW), and the National Centers for Coastal Ocean Science (NCCOS). Each of these agencies gave presentations and answered questions from Committee members and the public. In addition, there were state by state updates on development of offshore wind energy (OSW).

The CPSAS has chosen several points in the Report that are of concern. To better understand why we have raised concerns, it should be first noted that many of the fishermen and processors the CPSAS represent participate in multiple fisheries along the West Coast and/or Alaska. Processors that process and market CPS almost all process and market species from other fisheries. A diverse portfolio affords some protection against shifting abundances of product, and variable market demand. The policies and progress of OSW development in one region can be expected to infiltrate all regions and signals the need for cautious investment practice.

We have chosen to emphasize the following items, but this list is by no means exhaustive.

Renewable Energy Modernization Rule: Principles: We believe these principles are too generalized and the meanings are not transparent. With the realistic potential for ecological and economic impact, we need to slow this process to ensure all cautions and due diligence is exercised. Comments by the CPSAS in parentheses.

1. Eliminating unnecessary requirements for the deployment of meteorological buoys. (Needs clarification: What qualifies as an unnecessary requirement)?
2. Increasing survey flexibility. (Some on the East Coast believe OSW site characterization surveys have increased whale strandings. These surveys should be overseen by the National Oceanic and Atmospheric Administration fisheries and follow strict rules to prevent ecological damage).
3. Improving the project design and installation verification process. (This process needs to be stringent and done independently by professional experts).
4. Establishing a Public Renewable Energy Leasing Schedule. (Concur but need to know the process).
5. Reforming BOEM's renewable energy auction regulations. (Needs clarification: Reform in what manner)?
6. Tailoring financial assurance requirements and instruments. (As the potential for major disaster in the ocean is always of concern we want all potential damages, human life, and resultant ecosystem damage to be fully covered by bond and insurance at the point equipment is first moved offshore, and a commensurate insurance policy for site surveys).
7. Clarifying safety management system regulations. (Concur but the plan needs to be transparent to the public and workers).
8. Revising other provisions and making technical corrections. (Without knowing what this extends to we disagree with any revisions).

Oregon Call Areas: The CPSAS recommends the Council submit a memorandum to BOEM recommending they abrogate the legal formation of both Oregon Call areas. The Coos Bay Call Area now has a large section where the Department of Defense prohibited OSW development, and plans for Coast Guard PacPARS fairways will carve into the northern section. The Coos Bay Call Area occupies one of most ecologically productive marine zones in the world supporting a vibrant fishing economy. The Brookings Call Area is placed over an active earthquake zone and should also be withdrawn as a call area.

NCCOS Suitability Model (Model): The Model utilized by NCCOS provides a mechanism that has potential to assess actions and areas for development on an unbiased basis, but only if the input data is selected without prejudice. Final selection of this data should be subject to open public review and agencies such as ODFW. There is no logical reason productive fishing areas should not be registered as a NCCOS constraint thereby defining that area as a zero OSW development zone. BOEM is responsible to develop OSW with minimal to zero impacts to existing user groups or ocean environments. In our view, BOEM has failed to avoid conflict with fishing activities and has not taken steps to research and analyze environmental impacts, especially cumulative impacts. The Model could be a tool to help BOEM avert conflicts with fishermen and protect the marine environment.

Food is an elemental necessity for survival. US seafood is a secure and sustainable food source at a time many in the world go hungry. Productive food zones need strict protection. The current food supply is inadequate to meet the growing demand and this deficit is anticipated to increase. Productive harvest regions should be specified as formal NCCOS constraint zones to ensure they do not lose their food generation capacity.

We urge the Council to consider all the Advisory Body remarks and express our concerns to BOEM in a Council letter.

PFMC
03/08/23