

## ECOSYSTEM ADVISORY SUBPANEL REPORT ON MARINE PLANNING

The Ecosystem Advisory Subpanel (EAS) received a presentation from Scott McMullen on recent meetings of the Marine Planning Committee (MPC) with the Bureau of Ocean Energy Management (BOEM) that took place on February 2, 2023 and February 23, 2023 and are summarized in their report to the Pacific Fishery Management Council (Council) on marine planning issues (Agenda Item G.3.a, MPC Report 1). Our discussion focused on several key areas including: components of the Renewable Energy Modernization Rule; BOEM plans to survey Oregon's coastal residents regarding offshore wind energy; results of the suitability modeling; and, the significant potential challenges of situating wind turbines in the offshore waters of the West Coast, relative to waters closer to shore or East Coast sites, due to the higher energy marine environment. In particular, derelict, or damaged offshore wind components could have a widespread impact on fishing activities and ecosystem health beyond the specified call areas, exacerbated by the high energy conditions that frequent the areas under consideration for wind farm development.

The EAS discussed the portions of the Renewable Energy Modernization Rule and identified concerns on how financing of decommissioning costs, specifically related to allowing those costs to be incremental and spread out over the time span of the lease (38 years) rather than incurred up front. Under a longer-term payment plan, there was concern that if a wind turbine became damaged and went permanently offline after only a few years, decommissioning might not be completed by the responsible party due to lack of full funding and subsurface portions could be permanently left on the seabed. This could result in a hazard should the area eventually be reopened to bottom contact fisheries, or future unintended ecosystem impacts. The Subpanel suggests that a more appropriate, reasonable and fair funding scenario would be to incrementally fund decommissioning such that full funding for the decommission of each individual structure would be required by the time it is placed in the ocean — similar to a process for offshore cables.

It was noted that during oil leasing off California, oil companies were given leases for offshore platforms that are indefinite, as long as operational, with decommissioning strategies that are environmentally and fiscally questionable and uncertain<sup>1</sup>. The EAS considered whether a similar fate might happen to offshore wind platforms, turbines and/or blades, and discussed the possible consequences (e.g., resulting in ecological impacts, associated costs, navigational hazards, or fishing impediments).

Relative to the Oregon coastal constituent survey on wind energy, Mr. McMullen pointed out to the Subpanel that timing would not impact the current lease process since the survey report is not due till 2025; so the EAS questioned the value of a post-lease survey. However, since the current process is the first of potential future additional processes, it is expected that the report results will be used to refine future wind lease processes in Oregon, and may provide BOEM with better methods for communicating to the public regarding wind energy off the coast.

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<sup>1</sup> <https://www.latimes.com/environment/story/2021-10-10/californias-offshore-oil-rigs-decades-old-industry-resists-plugging-them>

The EAS discussed the Offshore Wind Suitability Modeling results presented at the February 2, 2023 MPC meeting and provided in Agenda Item G.3.a, MPC Report 1, in the context of the overlap between the Oregon Call Area off Coos Bay and previously undisclosed areas of importance to other federal agencies [e.g., Department of Defense (DOD) and the U.S. Coast Guard (USCG)]. Several EAS members expressed frustration that the process had advanced beyond the designation of Call Areas and almost to the point of lease auctions and these constraining areas were only recently identified. Not only has there been considerable time and effort involved in analyzing portions of the Coos Bay Call Area, in particular, that were ultimately precluded from offshore wind development, but the remaining available area is the portion closest to Heceta Bank, a unique feature of importance for fisheries and conservation efforts (and designated an Essential Fish Habitat Conservation Area). Also, it was noted that the Dungeness crab fishery off California will be required to have electronic vessel monitoring before the 2023-2024 season and considered whether those data could be used in future similar wind suitability modeling analyses.

The EAS also discussed the challenges of situating wind energy off the West Coast, relative to onshore or East Coast sites, due to its higher energy marine environment. It was noted that the Pacific coast has a much greater potential for generating wind energy compared to other areas where offshore wind has been proposed, and, in addition, the West Coast Call Areas are proposed in much deeper depths than for current Atlantic coast wind energy locations. The Pacific West Coast, particularly from north-central California and northward, can be characterized by intense winter storms with southerly winds and swells that, in combination with the deeper proposed depths, means turbines would be at significant risk during storm events. In addition, it is important to consider expected increases to magnitude and frequency of swells due to climate change<sup>2</sup>. Subpanel members expressed concerns that in the proposed Coos Bay Call Area if turbines were damaged in winter storms, the challenges of repairing or maintaining them in a timely manner might result in severed components that are moved northward onto Heceta Bank which could do irreparable damage to the reef. Likewise, what happens when the anchoring structures become disconnected from the seabed from significant storm events? Due to the long fetch across the Pacific, there is greater potential for rogue waves to severely impact or destroy offshore turbines and cause damage to coastal features and shorelines a fair distance from the structure.

### **Recommendations**

The EAS agrees with and supports the bullets presented under the Discussion and Feedback section on pages 4 and 5 of Agenda Item G.3.a MPC report. The EAS specifically highlights tribal concerns expressed in bullet 12 regarding displacement of fishing activities into tribal areas and the potential for increased ecosystem impacts, and supports the request that future suitability modeling include sensitive areas.

We would also like to add the following suggestions:

- In future Call Area identification, the process will benefit from more and earlier initial cross-agency discussions (e.g., DOD and USCG) so that unusable areas are eliminated in advance of Call Area designations.
- Due to the unique high energy environment of the regions proposed, we strongly encourage a recommendation where small scale trials are carried out demonstrating the efficacy of

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<sup>2</sup> <https://www.science.org/doi/10.1126/sciadv.aaz7295>

offshore wind and the ability of the platforms to survive the extreme and yet common oceanographic conditions on the Pacific Northwest Coast.

- Given there were fewer constraints on the western section of the Brookings Call Area apparent from the suitability modeling results, and in light of the concerns expressed in siting wind turbines in such a high energy environment, the Council may want to suggest that BOEM should plan to consider that area for initial implementation (as a test case).
- We recommend BOEM consider the EAS proposal for effective funding of decommissioning activities from the time of placement, and ensuring that there is a solid plan in place, so we don't end up with the "Mother Nature decommissioning plan".

PFMC  
03/07/23