

## GROUND FISH ADVISORY SUBPANEL REPORT ON MARINE PLANNING

The Groundfish Advisory Subpanel (GAP) received a briefing on this agenda item from Mr. Kerry Griffin, Pacific Fishery Management Council (Council) staff, and reviewed relevant Briefing Book materials. The GAP compliments Council staff and the Marine Planning Committee (MPC) for their comprehensive and careful shepherding of complex and contentious marine planning activities for the Council family, offshore wind (OSW) in particular. In addition to the important updates and discussions that occur via the MPC, the Council letters developed by Mr. Griffin and the MPC about marine planning activities are critically important, especially in communicating Council and fishery participant concerns about actions that will impact Council-managed fisheries.

The March 2023 MPC Report ([Agenda item G.3.a, MPC Report 1, March 2023](#)) is a thorough review of recent and imminent marine planning activities. The GAP agrees with the perspectives expressed by the MPC in their report. Specific to the OSW Call Areas off Oregon and MPC discussion about rescinding these Call Areas, the MPC “recommends that the Council consider the points described above and convey them to BOEM [Bureau of Ocean Energy Management], for incorporation into decisions about OSW energy planning and development on the Pacific Coast.” **Based on the body of evidence outlined by the MPC, the GAP urges the Council to recommend to BOEM that the current Oregon Call Areas be rescinded.**

To elaborate, it is unfathomable that BOEM continues to move forward with the process to identify Wind Energy Areas within the Oregon Call Areas. It is clear from [public and community input](#), that fishery participants, coastal communities, tribal governments<sup>1</sup>, and Federal and state policy makers all have valid concerns about what is a clear and present danger to sustainably-managed fishery resources, scientific research, physical oceanography, protected resources, and coastal economies. Before the Call Areas were formally announced, fishery participants cautioned BOEM that the fishery data sets employed by BOEM were insufficient both in time and scale. Nonetheless, BOEM developed and announced the Call Areas knowing their data was incomplete and their analyses flawed. The Call Areas were also developed without adequate consultation with the US Coast Guard and Department of Defense. As noted by the MPC, “[r]egarding the Coos Bay Call Area, there are two constraints that were not known when the Call Areas were identified: A Department of Defense (DOD) exclusion zone and coastal fairways proposed in the Pacific Port Access Route Study (PacPARS).” Moreover, and critical to the consideration of fishery displacement, the MPC report describes data analyses recently developed by National Marine Fisheries Service (NMFS) and Oregon Department of Fish and Wildlife (ODFW) that clearly and emphatically illustrate how harmful OSW could be to Council-managed fisheries.

Announcement of the Call Areas was premature at the time. Information and analyses developed since then only further strengthen the argument for rescinding the current Oregon Call Areas. It is also important to highlight that fishery participants are not solely focused on displacement and loss of fishing grounds, which are significant concerns. They are also concerned about, *inter alia*, collateral impacts on coastal communities, decreased safety of life at sea, disrupted scientific

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<sup>1</sup> Offshore Wind Moratorium, The National Congress of American Indians, [Resolution #ECWS-23-005](#)

research times series, harm to protected resources, and perturbations to oceanographic processes. The marine environment is complex, interconnected, and inextricably tied to the sustainability of Council-managed fisheries. OSW, pursued irresponsibly, is a threat to Council-managed fisheries, and a course correction is necessary. The only responsive and responsible action for BOEM to take is to rescind the Oregon Call Areas.

In making this recommendation, the GAP is in alignment with the Highly Migratory Species Advisory Subpanel (HMSAS) recommendation that BOEM “start the process over utilizing available tools, such as the [National Centers for Coastal Ocean Science] spatial suitability model, to identify least conflicted areas for which to establish future Call Areas. This would allow additional time to fill current data gaps (i.e., recreational albacore fishing effort), increase the likelihood of finding potential areas for offshore wind development where co-existence is possible, and conduct the necessary public engagement with potentially impacted stakeholders.”

Finally, the GAP also agrees with the HMSAS recommendation that “the Council support the fisheries data incorporated in the ODFW and NMFS and recommend its inclusion in the NCCOS spatial suitability model. We also recommend the Council acknowledge and indicate support for BOEM working closely with the State [departments of fish and wildlife] and NMFS to include the agencies' specialized fisheries analysis expertise.” The ODFW/NMFS fishery data analysis is incredibly informative and a perfect example of the type of information that should be foundational to responsible offshore energy development.

PFMC  
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