



Pacific Fishery Management Council

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

April 12, 2023

Mr. Doug Boren, Pacific Regional Director
Bureau of Ocean Energy Management
760 Paseo Camarillo, Suite 102
Camarillo, CA 93010-6002

Re: Recommendations for Improving Spatial Suitability Modeling and Strengthening the Offshore Wind Planning Process

Dear Mr. Boren:

Thank you for your continued engagement with the Pacific Fishery Management Council (Council) and in particular, with the Council's Marine Planning Committee (MPC). We especially appreciate the Bureau of Ocean Energy Management's (BOEM's) willingness to adapt the offshore wind energy planning process to better accommodate the needs and concerns of the West Coast fishing industry and fishing-dependent communities.

At the February 2, 2023 meeting of the Council's MPC, staff from the National Marine Fisheries Service (NMFS) West Coast Region, the Northwest Fisheries Science Center (NWFSC), and the Oregon Department of Fish and Wildlife (ODFW) presented their joint fishery data analysis and recommendations that they provided to BOEM for use in BOEM's spatial suitability modeling process, which is designed to inform the identification of Wind Energy Areas (WEAs) within the two Call Areas off the Oregon Coast. The Council urges BOEM to continue utilizing the expertise, data, and analytical tools available from NMFS and ODFW. The following comments and suggestions are provided, to strengthen BOEM's offshore wind (OSW) energy planning process.

- Use of this analysis would represent a beneficial improvement over similar analyses being employed in other parts of the U.S. The analysis included maps showing the ranked importance of fishing grounds in the two Call Areas for nine West Coast fisheries, as well as five alternatives for areas NMFS and ODFW recommend be excluded from siting. The Council encourages BOEM to give the alternatives strong consideration and look forward to additional information and explanation about the fishery suitability scores that will be used in the suitability modeling.
- We note that some fisheries have high importance in specific areas but only in relatively few years. The overall importance of these areas to these fisheries is under-represented because fisheries data is combined for multiple years, thus the periodic high importance of these fisheries are muted. We suggest incorporating a better representation of temporal variability, to reflect the importance of such fisheries.
- Suitability modeling should account for fishing behavior and operations aimed at avoiding incidental catch-constraining and restricted species, including having sufficient space to

search for aggregations of targets stocks with lower potential for incidental catch, and to follow fish schools as they move. The need for this additional component is illustrated in the NMFS/ODFW analysis, showing the space needed to successfully prosecute trawl and other fisheries. Fishing participants use real-time spatial tools and coordinated operations to avoid and respond to changing fishing conditions. We recommend that BOEM work with the fishing fleets to determine the best way to incorporate this information into the suitability modeling.

- We suggest continuing to use the NMFS/ODFW data and analysis and incorporating vessel monitoring systems (VMS) data where it can improve the data by including more sectors (e.g., salmon troll) and/or at a more refined scale (e.g., with highly migratory species data). VMS, when available, can provide a more accurate, refined depiction of fishing tracks and potentially provide better resolution of fishery importance in a given grid cell. VMS maps should use the best available techniques for assigning fishing trips to specific fisheries and fishery sectors.
- Add mechanisms to include fishing effort, location, and revenue data to account for boats fishing off Oregon and landing in Washington or California, where such gaps exist.
- Wild capture fishing is an excellent way to deliver high quality seafood protein to U.S. citizens. Consider incorporating pounds of protein in each grid cell to address seafood security and community impacts.
- Spatial data for recreational fisheries data is either not available or is too coarse scale to be used for this purpose. We encourage BOEM to consider how effort and revenue data from recreational fisheries may be better incorporated in future efforts.
- We suggest showing the Department of Defense (DOD) constraints and the U.S. Coast Guard Fairways overlaid on the Scenario 5 baseline map (see Appendix 1 to the March 2023 [MPC Report](#)), as well as for future maps depicting Oregon Call Areas and other OSW areas off the U.S. West Coast.
- BOEM should consider using this data to evaluate the entire U.S. Exclusive Economic Zone off the Oregon Coast to find the least conflicted areas. BOEM should consider looking beyond the two Call Areas before designating a draft WEA.
- The DOD constraint area includes much of the Coos Bay Call Area where transmission cable routes would likely be located. The Council suggests clarifying whether cable corridors would be allowed to go through the DOD constraint area to shore, because if they had to be routed north then it seems they would have to go through the Heceta Bank Essential Fish Habitat Conservation Area. The Council has previously expressed its concern for locating the Call Area and associated infrastructure on or near Heceta Bank or other areas with sensitive and important resources, and unique ocean circulation patterns. The Council again urges BOEM to closely evaluate cable route strategies in its siting decisions for Call Areas and Wind Energy Areas.
- Similar to the approach of compiling fisheries data, BOEM should include a careful analysis of ecosystem impacts and should identify sensitive areas such as larval nursery areas that may be impacted by OSW development.
- Offshore wind has the potential to cause real-world impacts to the cultural identity, food security, well-being, and economy of those Tribes of this Council that have federally recognized fishing rights. The Council notes that these Tribes are concerned that if these Call Areas are developed, the displaced fisheries could increase vessel traffic and fishing effort, thereby impacting the Tribes' fishing areas and activities. In addition, areas

developed for OSW could alter ocean ecosystem dynamics, resulting in unknown ecosystem outcomes and potential impacts to tribal treaty protected resources. Many of these Tribal resources originate in, or migrate from, areas off California and Oregon. Lastly, Tribes signed treaties with the United States Government, which the U.S. Supreme Court has upheld as the supreme law of the land, and the Biden-Harris administration has made commitments to uphold these rights. The Department of the Interior and BOEM have specific obligations, both as a party to the various treaties and as trustee of treaty-reserved resources, to ensure that the United States honors its commitments in those treaties in all aspects of its work, including offshore wind. The Council would like to receive an update on the other model data layers, particularly those for habitat and ecosystem (upwelling and primary productivity) as soon as possible.

Thank you for considering these comments, and we look forward to continued communication and engagement on this critical issue of OSW planning off the U.S West Coast. Please contact Kerry Griffin (kerry.griffin@noaa.gov) of our Council staff with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Marc Gorelnik". The signature is written in a cursive, flowing style.

Marc Gorelnik
Pacific Council Chair

KFG:rdd

Cc: Pacific Council Members
Susan Chambers
Mike Conroy