



Pacific Fishery Management Council

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

May 11, 2023

Mr. Douglas Boren, Pacific Region Director
Bureau of Ocean Energy Management
760 Paseo Camarillo, Suite 102
Camarillo, California 93010-6002

Re: Coast-wide Offshore Wind Energy Development Cumulative Impacts Analysis

Dear Mr. Boren:

At the April 2023 Pacific Fishery Management Council (Council) meeting in Foster City, California, the Council discussed issues related to current and future offshore wind (OSW) energy development in U.S. West Coast waters. There is substantial forward momentum on OSW planning on the U.S. West Coast, illustrated by the five recent California lease sales, by the pending identification of draft Oregon Wind Energy Areas, and by two unsolicited lease requests off the coast of Washington state. This momentum is consistent with the Biden Administration's ambitious renewable energy goals, and with state-level renewable energy goals. Recognizing this reality, the Council sees a crucial need for a comprehensive cumulative impacts assessment for the entire U.S. West Coast. This would help inform OSW planning and development in the future, and would assist the fishing industry, coastal communities, and resource managers in anticipating and addressing those impacts.

The Council recognizes the need for renewable energy sources to combat global climate change by reducing our dependence on fossil fuels. The fishing industry and fishing-dependent communities are well aware of the potential impacts from climate change, including sea level rise, geographic shifts of fish and shellfish populations, and the potential for catastrophic fishery stock collapse. These phenomena are happening now. However, we also understand the potential impacts to fisheries and coastal communities from large-scale development in the ocean environment. Our concerns are documented in the many letters we have sent to the Bureau of Ocean Energy Management (BOEM) in recent years.

While many of our concerns are site or region-specific, we are equally concerned about the long-term, region-wide impacts resulting from multiple large-scale OSW developments. This includes, but is not limited to, impacts to the economies of coastal communities, to the seafood supply chain and ancillary businesses, to the commercial and recreational fishing sectors, to important habitats and ecosystem processes, and to Tribal Treaty Rights. The cumulative, region-wide effects resulting from multiple OSW developments could result in unrecoverable impacts to many fishing sectors, habitats, and coastal communities.

The Council also notes that Tribes signed treaties with the United States Government, which the U.S. Supreme Court has upheld, 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. In addition to the concerns noted above, the Tribes are concerned about potential ecosystem impacts and resulting impacts to treaty protected resources due to decreases in fish abundance, productivity, and geographic distribution. It is expected that the cumulative impacts of OSW development on the West Coast will have a significant impact on treaty protected resources and tribes' ability to harvest them in the Usual and Accustomed fishing places.

In light of the Administration's renewable energy goals and the likelihood of OSW development to continue for many years into the future, we urge BOEM to develop a long-term cumulative impacts analysis for the entire U.S. West Coast. This analysis should model different levels of OSW development (e.g., 10, 50, 100 OSW leases), and the variable impacts of different geographic OSW concentrations and locations scenarios. The analysis should evaluate impacts to commercial and recreational fishing sectors and related businesses (processing plants, seafood wholesalers, and transportation); impacts to habitats and the California Current Ecosystem; as well as all associated economic impacts. The analysis would be in addition to analyses occurring in each West Coast state and should provide sufficient detail to inform responsible future OSW siting and development.

An approach to such a coast-wide cumulative impacts analysis could follow the National Environmental Protection Act (NEPA) process, by developing a programmatic Environmental Impact Statement (EIS) and cumulative impacts analysis that go beyond the typical scope of a NEPA cumulative impacts analysis. A comprehensive programmatic EIS such as envisioned here would describe cumulative impacts, including the compounding impacts resulting from reasonably foreseeable actions, which in our view would include future potential OSW planning and development along the entire Pacific Coast, evaluating scenarios as described above. Developing a programmatic EIS would not negate the requirement for an individual EIS for each project site, but it could potentially provide a comprehensive, long-term evaluation of OSW impacts on the U.S. West Coast.

While a NEPA or NEPA-like process could potentially achieve the result we envision, a comprehensive analysis could be completed independently from the NEPA process as well. The crucial element is to evaluate a sufficiently long time period, to evaluate various scenarios of development and related impacts, and to adequately investigate the breadth of potential impacts to fisheries, habitats, the California Current Ecosystem, coastal communities, affected economies, Indigenous peoples, and underserved communities.

The advent of industrial scale OSW development, while providing renewable energy, also brings a plethora of likely impacts, some of which may be irreversible and/or unmitigable. OSW planning and development must be conducted cautiously, with careful evaluation of all potential impacts, both short and long term. We hope that BOEM will sincerely evaluate the long-term cumulative impacts from OSW development on the U.S. West Coast, and we look forward to hearing back

from you on these suggestions. Thank you for your consideration of our concerns. If you have any questions, please contact me or Kerry Griffin on Council staff (Kerry.griffin@noaa.gov).

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
Mike Conroy
Susan Chambers
Katherine Westfall