

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON MARINE PLANNING UPDATE

The Coastal Pelagic Species Advisory Subpanel (CPSAS) reviewed the Marine Planning Committee (MPC) Report 1 on the May 18, 2023, MPC meeting, and Report 2 on the June 6, 2023 MPC meeting and listened to a verbal overview of these reports given by MPC co-chair Mr. Mike Conroy. We wish to thank the MPC, the co-chairs, Council Staff, and the Council for their continued diligence and hard work on this important topic, marine spatial planning. It is evident to the CPSAS that the Offshore Wind (OSW) developers and the Bureau of Ocean Energy (BOEM) are attempting to further speed OSW expansion in the US Economic Exclusion Zone without regard for the need to catalog the long list of major data gaps on potential environmental/ecological impairment and conduct the necessary research and/or modeling to fill these gaps. As we have expressed previously, this may degrade our marine ecosystem to levels of irreversible harm and may devastate our ability to harvest and process US sustainable seafood and thereby underwrite our national food security.

Our comments are brief and focus on several subjects discussed in the MPC reports.

1. The strategic plan required by AB525 *“requires consideration of impacts to coastal resources, fisheries, Native American and Indigenous peoples, and national defense, and strategies for addressing those potential impacts¹.”* *“Coastal resources” is being interpreted broadly to include biology, ecology and ecosystem functionality.* Page 4 of MPC Report 1 notes that information is often inconsistent and incomplete, and data gaps exist.

The CPSAS believes the above quoted statement from MPC Report 1 clearly indicates a serious and high level of importance in the AB525 highlighted act of consideration. Additionally, to fulfil this requirement, the CPSAS believes it is necessary to halt further OSW development until we are confident these important data gaps for OSW development and operations are filled and robust analysis has assured the fishing industry and other agencies, tribes, organizations, etc. that OSW will not have detrimental impacts on the marine ecosystem, fisheries and areas important to the Department of Defense.

2. *Fisheries Communication Plans (FCPs)*: Without going into detail, we believe the format for constructing and administering these FCPs are woefully inadequate in specificity, insufficient in formalized process, and have no designed and enforceable remedies to address disputes. Thus, these FCPs will result in confusion and frustration. In part this is because without the benefit of uniform constructs and administrative procedures, each developer can create plans that are materially different in scope and intent. Communities may be forced to deal with a large number of developers based on the extent their fishermen move up and down the coast. It is in the best interest of the communities to have a standardized format and neutral parties that can enforce standardized tenets for

¹ California Public Resources Code §25991.1(b)(12)

communication, and methodology that aids in resolving the issues that will arise. We support the requirement to post the draft FCPs for public review and comment.

3. The CPSAS strongly supports extending the MPC's mission in its present role as an advisory committee for the duration there are non-fishing economic interests that see the ocean as just another venue to conduct large business operations that could reduce or eliminate our fisheries, and/or impact the California Current Ecosystem and the productivity of our marine coastal environment or would otherwise operate without essential and sufficient regulatory governance.
4. The CPSAS supports and recommends that action be taken on all suggestions and recommendations put forward in the two referenced MPC reports. To this end, it may be beneficial to develop another Council letter to BOEM and other appropriate agencies.

PFMC
06/24/23