

June 20, 2021

West Coast Pelagic Conservation Group (WCP)
1804 Nyhus St N.
Westport, WA 98595

RE: C.4., Marine Planning recommendations and ideas for a Pacific Fishery Management Council Advisory Body for Marine Planning focused on Offshore Wind Energy and Aquaculture

Dear Chair Gorelnik and Council Members:

The West Coast Pelagic Conservation Group is composed primarily of NW CPS fishermen and processors. Our focus currently with the sardine population at the low end of its expansion-contraction cycle is collaborative research. We have worked with the SWFSC and WDFW to surveil the inshore waters where the NOAA survey vessel cannot go due to depth restrictions. Our fishermen fish Alaska salmon and squid.

Marine Planning, the PPMC, and Offshore Wind

Energy:

The Oregon Trawl Commission (OTC) held two public meetings on May 19th and 24th. The first covered the rapid authorization of offshore wind energy (OSW) projects on the East Coast and extension into the West Coast. The second was an OTC quarterly meeting which included a Bureau of Ocean Energy Management (BOEM) OSW presentation. This incorporated a question-and-answer session. WCP had several members in attendance.

On the 19th it was evident fishermen and processors had little grasp of what OSW development portends for their businesses, livelihoods, and families. On the 24th it was apparent that BOEM had no solid answers for the fishing communities' baseline questions: How many wind farms are envisioned for West Coast waters? What are the projected impacts for our fisheries, our infrastructure, essential fish habitat and the ecology of our ocean? These questions remain unanswered.

The fishermen and processors who collectively catch, process, and market our West Coast fish have been excluded from all aspects of the BOEM planning discussions. Ironically, BOEM EIS analysis indicates major impacts to fisheries [Vineyard-Wind-1-Supplement-to-EIS.pdf](#). The fishing industry writ large has not been given any role or meaningfully recognized as an economic sector. Without direct representation, the many generations of the seafood industry's political and policy involvement have been shoved to the sidelines. The former "titles" of fishermen are

now diminished to generalized group “labels” like “stakeholders,” and “ocean users.” This relegates fishermen and processors, and their work supplying U.S. food chains to part-time, minor league bench warmers of little material consequence.

The roots of the fishing industry off North America go back to the 15th century. West Coast fisheries are unmatched for conservation and sustainability safeguards. Our fisheries secure our nation’s need for a supply of nutritious, safe, and sustainable seafood. With this heritage it is unconscionable that OSW advocates and our government will sacrifice our fisheries on the altar of Green Energy, while encouraging development and granting huge subsidies to multinational corporations in a quest for a power source that may be outdated in 30 years. Green energy can be entirely land based. Ocean fishing cannot.

WCP was heartened to see the [Four State Report on Marine Planning Workload](#), Item H.5.a, April 2021 (Four State Report) This was authored by the Council members of the Oregon, Washington, Idaho, and California Departments of Fish and Wildlife (DFW). We concur with key statements in that report. In addition, we reference the [PFMC’s staff analysis](#) of that Four State proposal (emphasis added below):

“Council has a longstanding tradition of providing an inclusive forum for governments, scientific and industry experts, and interested and affected communities to effectively and efficiently bring information and advice together to inform the Council’s decisions and recommendations to NOAA Fisheries and other entities..... fisheries representatives and other marine experts that participate in the Council process are uniquely positioned to provide valuable and regionally informed input on fisheries activities across the West Coast and EEZ.....the four states expect that deeper Council engagement in marine offshore development and planning processes will lead to more robust and informed decision-making.” -- [Four State Report](#)

“The four states are interested in learning from the Council’s Executive Director about potential options for facilitating PFMC advisory body engagement with offshore development” -- [Four State Report](#)

“Establishing a lead AB implies that the Council itself wants to provide direct input to action agencies based on input from the AB(s). This would typically occur through formal communications such as Council approved letters or public comment portal submissions, for example, expressing concern about EFH impacts or disruption of fishing activities in a specific development site” -- [Analysis of Four State Proposal, Agenda Item C.4.a PFMC June 2021](#)

The Four State Report theme is that engagement with BOEM and offshore development through the Council, its advisory bodies (AB’s), and Council staff should follow traditional Council precedence and practice to establish a forum for Marine Planning. This would be as an “interested observer” but it formalizes the communication channel to BOEM. At this juncture, this option is the only credible connection available to our fishing industry. A formal AB and

Council link can tap into decades of expert data and knowledge that our Industry, our Council, their staff, and our ABs possess. It would allow us to act in consultation with BOEM and OSW developers to ensure the most accurate maps, and to plug our expertise into the equation as vetted reference points and data sets. This would open a reserve of professional knowledge on fisheries and ocean environment that cannot be duplicated. This formal exchange is essential if we wish to preserve our fisheries, ocean environment, and food network to the American public.

Few if any, in industry stand against renewable “green” energy, but we are unanimously angered with the present charted course OSW is on. If maintained it, will sweep much of the fishing/seafood industry from the ocean.

The option that best achieves the intent of the Four State Proposal is option “C”. However, the “Council Analysis Option C model” Marine Planning AB (MPAB) would be too expansive in personnel and would not be a match for the scope and speed of OSW development. To be effective the MPAB must be nimble, responsive, flexible, deployed quickly, and premised on a bottom-up approach. The MPAB must also maintain relationships and connectivity with the other AB’s, Council, states, NMFS and other agencies. We recommend the following modifications to staff’s analytical model that was used to analyze Option C. We also offer a Purpose and Need, some committee development constructs, and a “restructuring” of the analytical model.

Purpose and Need:

Purpose: The fishing industry has no voice and no public forum to address OSW or Aquaculture Opportunity Area (AOA) development impacts on our U.S. EEZ fisheries and essential fish habitat. The purpose is to introduce industry and stakeholder input and advice into the existing BOEM-PFMC communication channel and create a public forum through a MPAB. The center piece to make this fully effective is an ad hoc MPAB composed of panelists from the four fishing FMPs, other advisory bodies, and managers from the coastal states and NMFS. This MPAB would report to the standing AB’s and the Council, and work with dedicated specialists from NMFS, other agencies, and possibly other entities such as universities to assist in mapping and data collection. This would lead to creation of data repositories and analysis as needed. Accurate mapping needs to span decades and accurately reflect historical, present, and future fishing areas in our EEZ.

Need: There is need for a public forum, formal organizational structure, and protocols for active industry and other stakeholder participation in the communications with BOEM, fisheries mapping, and data collection. There is further need for a MPAB that focuses on offshore development, represents fishery and environmental concerns, and offers guidance and advice to the Council and their ABs on marine offshore development.

An industry vetting process is absent in the present mapping system. The Council is communicating with BOEM but presently there is no formal platform that allows the ABs to

participate in a bottom-up process on a consistent basis. A formal administrative platform and MPAB engagement are needed to protect the integrity of our fisheries and essential fish habitat. Fishermen knowledge is fundamental to the mapping process. As stated, and insinuated, in the Four State Report there is a need to quickly create a MPAB which is nimble, responsive, flexible, and small enough to act expeditiously. These WCP recommended alterations of the Council Analysis Option C model could provide a cost effective and efficient vehicle to couple and synchronize industry and the Council with the rapid expansion of OSW. And, as an “observer,” verify that our fisheries and ocean environment are being recognized as legitimate and material concerns that require protections and preservation for the welfare of our nation.

WCP Recommendations

Marine Planning Advisory Body Development and Timeline, Base Operating Constructs:

- Form an ad hoc MPAB at the June PFMC meeting.
- The MPAB needs to be nimble, responsive, and flexible.
- The MPAB membership needs to include advisory panel members from the four “fishing” management plans (FMPs) Advisory Subpanels (APs), the Habitat Committee and Ecosystem Advisory Subpanel, and the three coastal states.
- The MPAB should be the lead AB on offshore development and work closely with mapping specialists and data gathering experts.
- The MPAB needs dedicated resource specialists they can utilize and consult with, but who are not part of the MPAB.
- The MPAB may evolve into a longer-term standing committee, but this should be addressed at a future time as appropriate.
- The MPAB will need administrative Council staff support.

Recommendations for an Analytical Model Restructure:

- Two divisions of organizational structure: A formal ad hoc MPAB and a dedicated Resource Management Specialist Team (Resource Team) of resource specialists or representatives from other agencies to assist and support the MPAB.
- The Resource Team would work with the MPAB, on an independent and team basis. Resource Team Members would cover NMFS Surveys, GIS mapping, Aquaculture, U.S. Fish and Wildlife Service, with optional Enforcement, National Marine Sanctuary, or other specialists.
- For expediency, the MPAB should start as an ad hoc committee and be formed as quickly as possible, preferably at the June meeting.
- For optimal responsiveness, cost, efficiency, and flexibility we recommend the MPAB be comprised as follows:
 - One member each from the Coastal Pelagic, Groundfish, Salmon and Highly Migratory Advisory Subpanels, (CPSAS, GAP, SAS, & HMSAS) (4 members);
 - Sub-option: Two members each from the CPSAS, GAP, SAS, and HMSAS, (8 members)

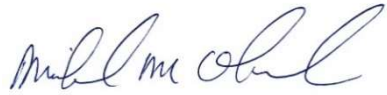
- One member each from the Ecosystem Advisory Subpanel (EAS) and Habitat Committee (HC), (2 members)
 - One conservation representative from one of the ABs, (1 member)
 - Three coastal state representatives from the Washington, Oregon and California Departments of Fish and Wildlife, (3 members)
 - One NMFS management member, (1 member)
 - Direct AB support: An administrative Council staff member and one GIS member: Direct AB support members: 2
 - Total AB members 11 or 15 if the sub-option: Direct Support: 2 Members: Total 13 people: (17 people if the sub-option is selected)
 - AB Chair: We recommend MPAB Co-Chair's: 1 Co-Chair from the CPSAS, HMSAS, GAP, or SAS and 1 Co-Chair from the States.
- We recommend the APs and state DFWs nominate preferred candidates for the Council Chair's consideration.
 - We recommend the ad hoc MPAB be given a charter of 2 years, and extended or restructured into a standing committee, as needed.
 - Meet a minimum of three times per year, or as needed at the scheduled Council meetings. Add one interim 1-day webinar 3 times per year.

Conclusion

The short history of the BOEM/OSW relationship with the U.S. fishing industry has started poorly. BOEM and OSW proponents have stated they are reaching out to industry; we find few if any in industry who agree with this assertion. The recent announcements for East Coast OSW sanctioned projects have fostered near rebellion. Fishermen will lose huge tracts of their traditional fishing grounds when all the areas set aside begin their survey process and construction. Not having a seat at the table with the agencies driving OSW development, nor a public forum is untenable.

We thank the authors of the Four State Report. We also thank Mr. Tracy and his staff for their Four State Report Analysis. These two papers do an excellent job outlining the problem statement and Council's legitimate interest in offshore development. OSW is going at light speed in a regulatory spectrum. We need to quickly develop an ad hoc MPAB that has attributes contained in option C of the Four State Report, follows that Report's rationale, and adopt WCP's (or similar) recommendations. Next, we must gain speed. That can only be accomplished with a smaller, more narrowly focused AB that has the resources it needs to create credible work products. What is offered herein with our supplemental comments can do that. We need to form a small, focused, and nimble Marine Planning ad hoc MPAB quickly that can be responsive and proactive to the current and future OSW construction plans. We urge the June Council create a MPAB at this June meeting.

Sincerely,



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