

United Cather Boats
Seattle, WA

Midwater Trawlers Cooperative
Newport, OR

Mark Gorelnik, Chair,
Pacific Fishery Management Council
Portland, Oregon

June 20, 2021

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 members of UCB and MTC have participated in the West Coast trawl fisheries for many decades and have a lengthy history of participating in the Regional Fishery Management process. We are writing to express strong concern over the way the Offshore Wind Energy (OSW) advocates and the Bureau of Ocean Energy Management (BOEM) are forcing OSW into our oceans without consideration of the negative impacts such permitting and offshore development will have on the existing users of the EEZ. There seems to be little to no opportunity for the fishing industry representatives to have a 'seat at the table' so to speak, let alone any requirements of economic and environmental impact studies. BOEM and other agencies are ignoring the protests of fishermen in every area where there is planned development in the hope of developing sources of clean and renewable energy.

Fishing interests are not being addressed or represented in the rapid expansion of OSW. The impacts to our fisheries on the West Coast will be severe if this continues unabated. The Pacific Fishery Management Council (PFMC) has a chance to give voice to our concerns and to vet the mapping and data collection that is used to site wind farms. This inadequately scoped OSW expansion may be devastating to marine mammals, sea birds, and other protected or endangered species. It most certainly will eliminate, or radically alter, many NMFS survey programs. Also, there are no peer studies or analysis of what damage to essential fish habitat these huge machines and the thousands of square miles they occupy will generate. Lastly there are no independent economic studies to inform us what impacts will befall our fishing communities.

The PFMC has a limited opportunity to create a public voice and forum that could channel our apprehension for the welfare of our ocean fisheries and environment to BOEM. Ideas and options were brought forward in the Four State Report [Four State Report on Marine Planning Workload](#), Item H.5.a, April 2021 (Four State Report) in option C for a Marine Planning Advisory

Body (MPAB) . This was submitted by the DFW's of Oregon, Washington, California and Idaho. We support Option C in the Four State Report. See [PFMC's staff analysis](#).

We thank the staff from the four states and the PFMC staff for their diligent work. However, we recommend that the personnel requirements they used for modeling Option C need to be downsized to no more than 15 total active MPAB members, comprised of other AB members and state representatives. There should be a relatively small-sized separate Mapping, Specialist, and Data team that would work closely with the MPAB. We recommend the MPAB should start as an "ad hoc" AB and be created as rapidly as possible at the June meeting. The meeting schedule, or similar to that outlined in the Staff analysis seems appropriate.

Our final recommendation is for the Council to refer to other public comments for more detail and guidance. We support the remarks presented in the Pacific Whiting Conservation Cooperative letter and the West Coast Pelagic Conservation letter.

OSW development may be the most impactful event that has faced our U.S. EEZ Fishing Industry. We strongly as that the Council engage its membership, AB's and Council staff in OSW development to observe and comment on its impacts. This can best be done by creating a responsive, nimble ad hoc Marine Planning Advisory Body at its June meeting.

Thank you for your consideration of our requests on this issue.

Sincerely,

Brent Paine
United Catcher Boats

Heather Mann
MTC