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CEC Offshore Wind Energy Project

09/30/2020

West Coast Pelagic Conservation Group

Westport WA

Ms. Karen Douglas,
Executive Director California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Ms. Douglas

Please accept these comments on behalf of the West Coast Pelagic Conservation Group: (WCP)

WCP membership is composed of fishermen and processors that fish and process in the U.S waters and communities of the west coast and Alaska, from San Diego to the Bering Sea. As an organization we are not presently members of the Responsible Offshore Development Alliance (RODA) or of the Pacific Coast Federation of Fishermen's Associations (PCFFA). However, we do support the valuable work each group is doing to protect our harvest privileges and which allow our nation to enjoy sustainable seafood harvested under the statutes and regulations of the Magnuson-Stevens Fishery Conservation and Management Act. (MSA) With the advent of COVID-19 providing food supplies for our nation, that are safe and secure, is of more importance than ever. U.S. produced seafood allows us to create U.S jobs based on arguably the best harvest practices in the world. U.S. production offsets the tremendous seafood trade deficit that now exists with those countries that do not practice sustainable management and have no regard for habitat, ecosystems, fair labor practices, or the environment.

Our members are apprehensive that we will sacrifice one sustainable resource while we chase another without fully vetting the impacts or engaging with the industry that has fished off our coast for many generations.

We offer the following points

• There is need for improved and transparent engagement with the fishing industry and communities dependent on our fisheries.
o Industry should have a defined, sanctioned, and decision-making role in the planning, siting, and operations of all offshore projects.

- o High focus must be paid to the most affected fisheries in any given area under consideration for leasing.
- o CEC and BOEM must identify all those who will be impacted on the water, in the communities, and in critical supply chains.

â€¢ Resources for research into impacts and accurate monitoring must be allocated immediately.

- o Developers and leasing agencies should understand that many present data sources do not accurately capture fishing effort.
- o Industry members and agencies involved in fisheries management need to be consulted when analyzing data and developing monitoring plans; this should include the Pacific Fisheries Management Council (PFMC), NOAA Fisheries science centers, CA Dept. of Fish & Wildlife, etc.
- o Without sufficient research into the socio-economic impacts, impacts to shoreside communities and cumulative impacts with multi-project build outs the fishing industry may be forced to cease operations entirely.

â€¢ The commercial fishing industry has significant concerns about the Expansion Areas.

- o Expansion areas will displace more fishing operations or make them infeasible. Moving to another port may not mitigate the issue as they may encounter the same circumstances they left. Lack of transparent planning and the rapid development of more projects will only exacerbate the fishing industry's chances for survival.
- o The process by which the Expansion Areas were identified was through a closed-door meeting with only a subset of affected parties, and has excluded fishing industry representation. This may lead to political gridlock stymieing any opportunity for reconciliation between these two industries

In addition to these points we wish to stress our support for the letters written by the Pacific Fishery Management Council, RODA, and the draft we have seen from the PCFFA. Many members of our organization fish in California waters. Many of those same members have a proud heritage that goes back for multiple generations. We do not expressly oppose green energy, but we will be opposed to the development of this resource if it dispossesses us of our heritage and livelihoods. To ensure that does not happen the fishing industry must be involved in the process and guaranteed we will be able to harvest our sustainable resource and provide our nation food from the sea for the generations to come.

Thank you.

Respectfully,

Mike Okoniewski, Secretary-Treasurer, WCP

Greg Shaughnessy, Vice President, WCP