



American Albacore Fishing Association, Inc.

September 25, 2023

Jean Thurston-Keller
Bureau of Ocean Energy Management
Pacific Regional Office – Renewable Energy Section
760 Paseo Camarillo, Suite 102 (CM 102)
Camarillo California 90101

Re: Draft Wind Energy Areas – Commercial Leasing for Wind Power Development on the Oregon Outer Continental Shelf

Dear Jean,

The American Albacore Fishing Association (AAFA) and Western Fishboat Owners Association (WFOA), representing the commercial north Pacific albacore fishery (fishery) operating off the U.S. west coast, request a 30-day extension of the comment period for the Draft Wind Energy Areas (DWEAs) off the Oregon Coast, until November 15, 2023.

The fishery typically operates between July and October and this year is no different. As a user group who would be directly impacted by developments within these draft Wind Energy Areas, via loss of important fishing grounds, the extension would provide fishery participants sufficient time to review the DWEAs and accompanying *Draft NCCOS Report: A Wind Energy Area Siting Analysis for the Oregon Call Areas* (Aug. 2023) in order to offer informed and detailed comments and recommendations.

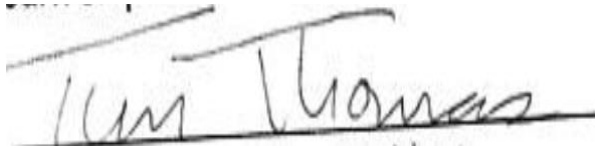
The fishery is prosecuted by vessels using troll gear as well as pole and line gear. Between 2012 and 2020, an average of 570 vessels participated in this important fishery, catching 10,300¹ metric

¹ See PFMC Highly Migratory Species Fishery Management Plan Stock Assessment and Fishery Evaluation (SAFE) documents, Table 5 - Number of vessels and landings (round mt) in the West Coast albacore surface hook-and-line (troll and baitboat) fishery.

tons generating roughly \$38.4M in ex-vessel revenues² annually³. Each of these vessels are small businesses, many family-owned, that provide food security to the nation as well as jobs and economic benefits to fishing communities up and down the west coast. Our memberships span the coast from San Diego, California to Bellingham, Washington.

Please contact us for further questions and information.

Kindest regards,



Tim Thomas
President
American Albacore Fishing Association



Clayton Wraith
Executive Director
Western Fishboat Owner's Association

² Ex-vessel revenues represent the dollars paid to the vessels and does not represent the true economic value of our catch to the dependent fishing communities. The total economic value of our fishery, including the downstream benefits, is surely in the hundreds of millions of dollars annually.

³ See PFMC Highly Migratory Species Fishery Management Plan Stock Assessment and Fishery Evaluation (SAFE) documents, Table 6 – Real (inflation adjusted) ex-vessel revenue for the West Coast albacore surface hook-and-line (troll and baitboat) fishery.