



American Albacore Fishing Association, Inc.

October 31, 2023

Mr. Doug Boren, Director
Pacific Regional Director
Bureau of Ocean Energy Management
760 Paseo Camarillo, Suite 102
Camarillo, CA 93010

**Re: Bureau of Ocean Energy Management’s Draft Wind Energy Areas; Request for
Comments: Commercial Leasing for Wind Energy Development on the Oregon
Outer Continental Shelf Offshore; Docket No. BOEM-2023-0033**

Submitted electronically via Regulations.gov

Dear Mr. Boren,

The American Albacore Fishing Association (AAFA) and Western Fishboat Owners Association (WFOA), representing the commercial north Pacific albacore fishery (NPA fishery) operating off the U.S. west coast, are pleased to submit the following comments on the Draft Wind Energy Areas (DWEAs) off the Oregon Coast.

Except where our comments differ, AAFA and WFOA support and endorse the comments submitted by the Responsible Offshore Development Alliance (RODA) and the Pacific Fishery Management Council’s (PFMC) DRAFT comment letter as it appears in the Briefing Book for the PFMC’s November meeting¹.

¹ See - <https://www.pcouncil.org/documents/2023/10/c-3-supplemental-attachment-3-draft-pacific-council-comment-letter-re-bureau-of-ocean-energy-management-request-for-comments-draft-wind-energy-areas->

The Importance of the fishing industry, generally, and to Oregon, specifically

As noted in the PFMC's Draft comment letter, the NPA fishery is economically and socially important to the State of Oregon. We contend that the NPA fishery is similarly important to the nation. In 2022, 430 individual U.S. vessels harvested 8,971 metric tons with estimated ex-vessel revenues of \$36 million.^{2 3} 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 10,300⁴ metric tons generating roughly \$38.4M in ex-vessel revenues⁵ annually⁶. 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.

The fishery operates offshore and is one that would be directly impacted, via loss of productive fishing grounds, by offshore wind developments off the U.S. west coast, and in the DWEAs in particular. The NPA fishery, and its representatives, have consistently asked for opportunities to engage with BOEM during the planning process. To date, these requests remain unanswered. That BOEM would move forward with its process without any engagement with an important west coast fishery that stands to be directly impacted is disturbing. Given likely future developments off the west coast, it is imperative that BOEM take a holistic approach to planning and siting that includes those most likely to be impacted. The professional fishermen and women that work the waters off the U.S. west coast to feed our nation deserve at least that. While the Draft Report prepared by NOAA's National Centers for Coastal Ocean Science (NCCOS) entitled *A Wind Energy Area Siting Analysis for the Oregon Call Areas*⁷ does capture the importance of the waters

commercial-leasing-for-wind-power-develo.pdf/. We acknowledge any comment submitted to BOEM by the PFMC may differ from that posted to the Briefing Book. For sake of clarity, we are limiting our support and endorsement to the content of the PFMC's DRAFT comment letter.

² <https://www.fisheries.noaa.gov/species/pacific-albacore-tuna>

³ 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

⁴ 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.

⁵ 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.

⁶ 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.

⁷ https://www.boem.gov/sites/default/files/documents/renewable-energy/state-activities/Oregon_WEA_Draft_Report_NCCOS.pdf

off Oregon to the NPA fishery, it then dilutes that by including other fisheries which aren't as dependent on those waters.

AAFA and WFOA fully support the recommendation contained in the RODA comment letter that **BOEM cancel the Draft WEAs, rescind the Call Areas, and restart the planning process utilizing the NCCOS spatial suitability model covering all areas off the Oregon coast greater than 12 miles offshore, including areas deeper than 1,300 meters, excluding from further consideration all offshore banks and seamounts and requiring an adequate buffer zone surrounding them. In the alternative, we support the recommendation of the PFMC that BOEM not take any further actions on OSW energy planning off Oregon until the many concerns identified by stakeholders, fishery managers, and BOEM's sister agencies, are addressed and included in the process.** Starting over, including those buffer zones, will increase the likelihood the NPA fishery can co-exist with this new use of the ocean space. While we acknowledge starting the process over will add time, we believe a holistic approach to planning and siting should not be made subservient to arbitrary timelines to meet arbitrary goals. If co-existence of offshore wind facilities and fisheries is truly a goal of BOEM, we must take the time to ensure co-existence is possible. Given the importance of the DWEA off Coos Bay to the NPA fishery, co-existence is called into question. The Draft PFMC comment letter includes specific aliquots for removal based on the relative importance to the NPA fishery. While our members are the commercial fishery, we believe the recreational albacore fishery has a higher level of dependence on aliquots closer to shore within the two DWEAs. The lack of any recreational fishing information included in the Draft NCCOS Report is notable.

Navigational concerns:

Our members operate out of all ports up and down the Oregon coast. Given that many of our fishing activities will take place seaward of any future offshore wind facilities, care must be taken to ensure the fishing industry has safe access to and from these ports in prevailing weather conditions. Our members are in the process of wrapping up their 2023 fishing seasons. As such, we strongly encourage BOEM to engage with NPA fishery participants to capture their inputs on both prevailing weather conditions and course lines/headings to and from the ports and harbors shoreward of the DWEAs.

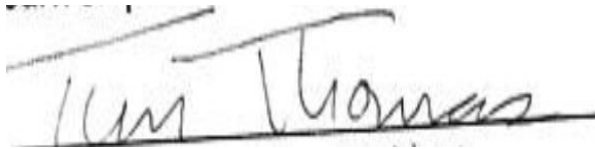
International concerns:

The treaty between the governments of Canada and the United States on Pacific Albacore Tuna Vessels and Port Privileges was signed in 1981. The agreement was amended in 2002 and codified by law in April 2004. It allows U.S. vessels to fish for albacore tuna in Canadian waters seaward of 12 miles from shore and allows Canadian vessels to fish for albacore tuna in U.S. waters seaward of 12 miles from shore. The treaty also allows Canadian vessels to use certain U.S. ports to obtain supplies and services and to land fish; similarly, it allows U.S. vessels to use certain Canadian ports for the same purposes. In addition, the treaty calls for the exchange of

fisheries data between the two governments. Potential impacts of offshore wind development off the U.S. west coast on the future effectiveness and benefits of the Treaty need to be considered.

Please contact us for further questions and information.

Kindest regards,

A handwritten signature in black ink that reads "Tim Thomas". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Tim Thomas
President
American Albacore Fishing Association

A handwritten signature in black ink that reads "Clayton Wraith". The signature is written in a cursive style with a large, stylized "W" and "A".

Clayton Wraith
Executive Director
Western Fishboat Owner's Association