

George Bradshaw
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Lorne Edwards
Secretary
Lori French
Treasurer



Mike Conroy
Executive Director
Glen H. Spain
Northwest Regional Director
Vivian Helliwell
Watershed Conservation Director
In Memoriam:
Nathaniel S. Bingham
Harold C. Christensen
W.F. "Zeke" Grader, Jr.

Please Respond to:

California Office

P.O. Box 29370
San Francisco, CA 94129-0370
Tel: (415) 561-5080
Fax: (415) 561-5464

Northwest Office

P.O. Box 11170
Eugene, OR 97440-3370
Tel: (541) 689-2000
Fax: (541) 689-2500

September 13, 2021

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Regional Supervisor
Office of Environment
Bureau of Ocean Energy Management
760 Paseo Camarillo, Suite #102
Camarillo, CA 93010-6002

Submitted via email to Humboldt@shorewind@boem.gov.

RE: PCFFA comments on BOEM Humboldt Wind Energy Area Environmental Assessment.

To Whom it may concern:

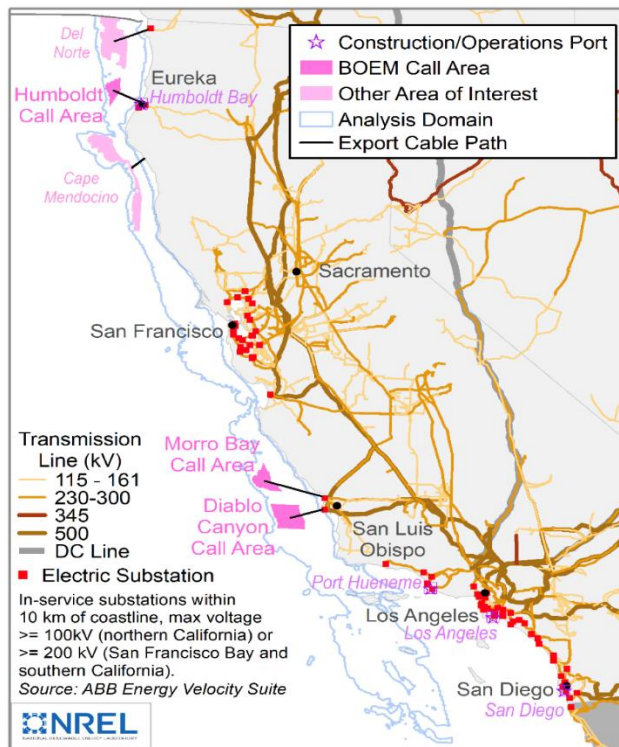
We appreciate the opportunity to provide the following comments on the Humboldt Wind Energy Area designation and public scoping to inform the development of an Environmental Assessment (EA). The Humboldt Wind Energy Area (HWEA) encompasses 206.8 square miles of offshore space which is integral to our coastal community's way of life, well-being and is of significant importance to our local fishing industry and the nation's seafood supply. Our future, as fish harvesters, is tied to access to sustainably managed marine resources. The health of those resources is dependent on the habitat essential for their continued populations. We suggest that offshore wind only be developed in an appropriately regulated, sustainable manner that is consistent with protecting fishing communities, the nation's seafood security, and other ocean-based activities. We would be remiss if we did not highlight the lack of any meaningful engagement with the fishing industry since the announcement of the Humboldt Call Area in late

2018. We submit these scoping comments to help identify areas of concern that need adequate study and remediation.

The Pacific Coast Federation of Fishermen’s Associations (PCFFA) is the largest and most active trade association of commercial fishermen on the West Coast. PCFFA has led the fishing industry in protecting the rights of fishermen and fishing communities since 1976. We constantly fight for the long-term survival of commercial fishing as a productive livelihood and way of life.

At the outset, we appreciate and endorse the comment letters submitted by the Pacific Fisheries Management Council (PFMC) and the Responsible Offshore Development Alliance. We share most, if not all, of the concerns raised in their letters and hereby incorporate them by reference.

The waters included within the HWEA are important for a number of fisheries and fishermen operating off the U.S. West Coast. It bears noting that many west coast fishing operations are highly mobile, and operations based in San Diego or Seattle may ply their trades in the area encompassed by the HWEA. During the July 13 BOEM-California Intergovernmental Task Force meeting, the following slide was shown.



Concerning to many west coast fishing operations is the potential cumulative impacts of other likely Wind Energy Areas very near the HWEA. In particular, the areas identified as “Other Area of Interest” in the above slide. These, along with the HWEA, represent highly productive fishing grounds that west coast fishermen and dependent communities depend upon. So while we are currently being asked to comment on impacts of the HWEA, it is the threat of cumulative impacts resulting from the industrialization of the ocean offshore the northern California coast which

causes the most concern. We request that BOEM delay moving forward on the HWEA until all potential sites for offshore wind off the U.S. west coast are identified and Call Areas announced. Unless and until we have a complete picture of BOEM's plans for offshore wind off the west coast, we cannot properly address cumulative impacts to our fishermen, our fisheries, our fishing communities, the environment, the ecological function of the California Current, etc.

We acknowledge the specific ask here is limited to input on site assessment and site characterization activities (e.g., survey activities and core samples) which includes a variety of scientific surveys to gather data on the environment in the Humboldt Wind Energy Area, as well as other uses of the OCS in the vicinity.

- The surveys will, by their nature, interfere with the legitimate, licensed business activities of the local fishing fleets; and by extension, all the businesses that supply and benefit from fish harvesting, as well as the consumers of local seafood products.
- Survey vessels and the possible deployment of specialized weather buoys can interfere and compete with the regular and lawful activities of fishing businesses as they set and retrieve gear necessary to harvest seafood.
- There could also be conflicts shoreside as survey vessels utilize valuable space serving the local fishing industry; for example, in accessing fuel docks, offloading product, loading and unloading gear, do repairs at the boatyard, etc.
- Survey vessels transiting through deployed fishing gear, including large numbers of trap gear used by the dungeness crab and groundfish fisheries, can inadvertently pick up that gear by catching it on their rudders and propellers. Such was documented during recent surveys conducted in anticipation of deploying fiberoptic cables off the Humboldt coast. Sonic noise generated by surveys can impact fish locations and result in a loss of catch for the fishing industry.
- Acoustic geographic surveys have been known to displace fish from areas. How do they impact whale feeding and migrations? The State's dungeness crab fishery is currently under very strict limitations to avoid whales. Surveys could push whales into fishing areas, or otherwise disrupt the habitat and survival of some species listed under the Endangered Species Act, and other species of concern
- Given the severe weather, which is commonplace during the winter months, we suggest site characterization activities be extended so any potential developers can assure the public that the weather in the HWEA has been properly accounted for during the Construction and Operations phase of the process. With winds in excess of 50 knots and sea states in excess of 35 feet, there is a genuine concern about turbine failure or toppling.
- Perhaps most important, from a safety perspective, increased vessel traffic during limited tidal windows for entering and exiting the narrow Humboldt Bay entrance can result in extremely dangerous and potentially deadly situations for fishing vessels. Severe shoaling has affected Humboldt Bay since November 2018, causing breaking surf inside the harbor and making the transit dangerous to mariners. In November of 2018, a Lighted Bell Buoy drifted off station as a result on heavy weather. It is worth noting that exports of wood chips from the areas are limited to half the year because the entrance bar shallows up.

On its website BOEM states, it “remains committed to a permitting process that minimizes user conflicts and establishes a strong foundation for wind projects moving forward.¹” We provide the following comments to address the permitting process.

- The Magnuson-Stevens Fisheries Conservation and Management Act (MSA) established “a national program for the conservation and management of the fishery resources of the United States is necessary to prevent overfishing, to rebuild overfished stocks, to insure conservation, to facilitate long-term protection of essential fish habitats, and to realize the full potential of the Nation’s fishery resources”². One of the express purposes of MSA is to “to take immediate action to conserve and manage the fishery resources found off the coasts of the United States, and the anadromous species and Continental Shelf fishery resources of the United States, by exercising (A) sovereign rights for the purposes of exploring, exploiting, conserving, and managing all fish, within the exclusive economic zone established by Presidential Proclamation 5030, dated March 10, 1983, and (B) exclusive fishery management authority beyond the exclusive economic zone over such anadromous species and Continental Shelf fishery resources;³” Now BOEM proposes to utilize the exclusive economic zone (EEZ) for wind-energy production; and in so doing needs to consider existing uses of the ocean. MSA also created the (PFMC) which manages fisheries for approximately 119 species of salmon, groundfish, coastal pelagic species (sardines, anchovies, and mackerel), and highly migratory species (tunas, sharks, and swordfish) on the West Coast of the United States. The PFMC is one of eight regional fishery management councils established by Congress in 1976. The PFMC’s Habitat Committee provides advice to the Council on a wide variety of habitat-related issues. The committee works with other advisory bodies on habitat issues, helps develop ways to resolve habitat problems and avoid future habitat conflicts, and makes recommendations for actions that will help achieve the Council’s habitat objectives.
- We have a pristine ocean environment off Humboldt that U.S. fish harvesters rely on, as essential workers⁴, to feed the State’s and nation’s residents with a locally sourced, high quality, source of protein. This seafood is harvested without the carbon footprint of shipping imported seafood from distant lands.
- While some have promoted job creation resulting from the wind energy sector, we must be mindful of where those jobs will be located and whether they are temporary in nature or permanent. We also must take into account jobs lost in other industries, fishing for example, resulting from the displacement of those industries. In addition to lost harvester jobs, employment in industries dependent on our activities will suffer significant harm. For example, processors, gear stores, marine mechanics, machine shops, shipyard facilities, bait suppliers, etc).
- Other downstream beneficiaries - families, seafood consumers, restaurants, fish markets, will all be impacted. For the vast majority of the State’s and nation’s residents, the only access they have to the living marine resources within the U.S. EEZ is through the

¹ See [Humboldt Wind Energy Area | Bureau of Ocean Energy Management \(boem.gov\)](#)

² 16 U.S.C. §1801(a)(6)

³ 16 U.S.C. §1801(b)(1)

⁴ When Governor Newsom issued stay-at-home orders at the outset of the COVID-19 pandemic, commercial fishermen were identified as “essential workers”.

products we harvest for their benefit. Any reduction in that access should be an environmental justice concern.

- The turbines themselves have a large carbon footprint: It does not make economic or ecological sense to produce “green energy” by shipping steel parts made by burning coal in China, where prevailing winds likely degrade our air quality here on the West Coast. Any reduction in domestically provided seafood will open the door to imports with far less concern about the ecological impacts of their fishing operations. Those imports will have a significantly larger carbon footprint when compared to domestically produced seafood. We have to be mindful of the net climate impacts worldwide resulting from the entire lifecycle of offshore wind facilities.
- The electricity generated from the HWEA would likely exceed capacity for shoreside based landing facilities. Would excess electricity be transmitted via subsea cables to other landing spots? We have repeatedly heard that San Francisco is a likely landing spot that would require hundreds of miles of additional cables running through sensitive habitats. Despite many webinars on the subject (both those hosted by BOEM and those hosted by others, it remains unclear how a large amount of electricity would be transported to the grid. The cost and environmental cost of developing long distance transmission capacity has not been addressed, whether subsea or over land.
- The likely cost to the consumer has yet to be adequately addressed. It is clear that development of the offshore wind industry will be expensive – both at sea and on land. Will disadvantaged communities be unable to benefit from this energy because it will be cost prohibitive?
- Closing areas to fishing can crowd fishing “effort” into smaller areas, putting pressure on important commercial and recreational stocks.

We have proposed a few alternatives above; and offer some additional ones below.

- A reasonable alternative could be a much smaller lease area that would serve only local electrical needs and help answer many of the unanswered questions which remain surrounding floating offshore wind.
- A reasonable alternative we could support is a “no action alternative.”
- Humboldt County is an electrical “island;” that is, it is sometimes cut off from electrical service from inland by winter storm damage. Humboldt Bay Power Plant, a natural gas plant, was designed to supply local electricity needs on short notice when the area is “islanded.” A reasonable alternative would be local micro gridding: local labor can be trained up to retrofit homes, businesses, bikes, boats with small-scale wind and solar chargers, and local planning can promote public transportation options.
- The Block Island Wind Farm (BIWF) off Rhode Island was developed as an example of what could be accomplished, the “first of its kind.” It has had a lot of problems, from the high voltage cable becoming unburied on a popular swimming beach, to problems with the side-drilling conduits, and concerns about cracks in the maintenance landing platforms. Four of the five turbines have been shut down since early summer; and there are concerns of cost overruns on the repairs. Why not wait until the problems with pilot projects like Block Island are resolved before investing heavily in additional large proposals? We recommend that you hold off on selling leases or committing to a formal “project” that would require a NEPA EIS at least until problems at Block Island are resolved and we can learn what it has to offer.

Thank you for this opportunity to provide scoping comments.

A handwritten signature in blue ink, appearing to read 'MK/8'.

Mike Conroy
Executive Director
Pacific Coast Federation of Fishermen's Associations
mike@ifrfish.org