



North Pacific Fishery Management Council

Simon Kinneen, Chair | David Witherell, Executive Director
1007 W. 3rd Avenue, Suite 400, Anchorage, AK 99501
Phone 907-271-2809 | www.npfmc.org

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Ms. Janet Coit, Assistant Administrator
NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910

Ms. Amanda Lefton, Director
Bureau of Ocean Energy Management
1849 C Street, NW
Washington, D.C. 20240

Dear Ms. Coit and Ms. Lefton:

On behalf of the North Pacific Fishery Management Council, I am pleased to provide comments on the Draft Federal Survey Mitigation Strategy to address anticipated impacts of offshore wind energy development on NOAA Fisheries' scientific surveys. While we are not aware of any proposed offshore wind energy projects off Alaska's coasts, we are grateful for an opportunity to be engaged early and benefit from the experience in other regions, including a review of the framework mitigation strategy developed for the Northeast U.S. region.

The North Pacific Council has a successful record of science-based, sustainable fisheries management since the Magnuson-Stevens Fishery Conservation and Management Act was implemented in 1976. Each year for the past 40 years, the sustainable harvest of groundfish in the North Pacific totals 2,200,000 metric tons or greater. This level of harvest accounts for about 60% of the total U.S. harvest of wild seafood and is critical to ensuring food security for the nation due to the both the size and the stability of the annual yield.

NOAA Fisheries surveys are the foundation of our sustainable management approach and continue to be essential to ensure that sustainable harvests are maintained in the North Pacific. These surveys are the fundamental data source for groundfish stock assessments and ecosystem assessments, and are the most critical responsibility of the Alaska Fisheries Science Center to meet its mission of monitoring the health and sustainability of living marine resources and their habitat. In addition, the state of Alaska and other entities partner with NOAA Fisheries on surveys to provide critical information for management of crab and salmon fisheries. Based on review of the draft mitigation strategy and interactions with other regional fishery management councils, we understand that offshore wind energy projects can create vast areas where traditional survey stations are modified or can no longer be accessed, which reduces the survey data available and jeopardizes critical data time series used for science-based fisheries management. Data loss also can increase uncertainty in assessments and result in reduced catch limits due to the need for precautionary management with greater uncertainty. We appreciate that your agencies recognize these impacts and are developing an advanced planning and mitigation process to ensure that wind energy project development does not impede NOAA Fisheries from achieving its mission.

Our understanding is that the Implementation Strategy developed for the Northeast and Mid-Atlantic will be used as a model to address the impacts of offshore wind projects on NOAA fisheries surveys nationwide. However, it is not clear if similar implementation plans will then be developed for each region. We encourage development of regional offshore wind energy mitigation plans at the appropriate time to ensure the plans are tailored to the NOAA Fisheries surveys, partner agencies and stakeholders in each region. In addition, we appreciate the stated intent in the Draft Implementation Strategy to share experiences and lessons learned from other regions and countries to develop a framework mitigation strategy.

We appreciate the clear goals and objectives of the Draft Implementation Strategy, which could serve as a foundation for all regional plans. Of particular interest is the plan for communication, coordination and outreach to implement regional plans. It is essential for all plans to ensure that early communication and coordination is provided for potential development projects, and the implementation strategy should provide for meaningful consultation and collaboration with the NOAA Fisheries science centers, regional fishery management councils, affected state agencies, and impacted fishery stakeholders and fishing communities. The communication and outreach plans must be transparent with respect to information availability and participation opportunities and should use existing NOAA Fisheries and regional fishery management council structures along with the methods proposed in the Draft Implementation Strategy. Additionally, the Draft Implementation Strategy notes that the effort to mitigate the impact of offshore wind energy development on NOAA Fisheries surveys will be complex and take extensive resources. This is concerning because resources available to NOAA and State agencies are already constrained, and a survey mitigation strategy for the North Pacific could require extensive resources to develop, and later to review proposed lease sales and wind farm plans. We recommend due consideration of these resource constraints in developing regional plans and suggest that project proponents be required to contribute funding for the scientific evaluation of the impacts to surveys and development of a mitigation plan.

Again, thank you for the opportunity to comment on the Draft Federal Survey Mitigation Strategy. The North Pacific Council looks forward to working with your agencies as a key partner in ensuring that we continue our obligations under the Magnuson-Stevens Act and other federal laws to provide sustainably harvested fisheries resources in support of U.S. food production and food security goals.

Sincerely,



Simon Kinneen
Council Chair

cc: Dr. Robert Foy