

Alliance of Communities for Sustainable Fisheries

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Michael F. McAllister

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Vice Admiral, USCG Pacific Area

Federal eRulemaking Portal <https://www.regulations.gov>. Docket #USCG-2021-0345

Dear Vice Admiral McAllister,

Please accept these comments on the Port Access Route Study.

The Alliance of Communities for Sustainable Fisheries (ACSF) is a 501(c)(3) not-for-profit educational organization, founded in 2002 for the purposes of connecting fishermen with their communities and to represent fishing interests in state and federal processes. The ACSF is a regional organization, with commercial fishing leader representatives from Monterey, Moss Landing, Santa Cruz, Morro Bay and Pillar Point harbors and Port San Luis on our Board of Directors. Port communities and several recreational fishing organizations also have representatives on our Board. Thus, the ACSF represents a large cross-section of fishing and community interests for the Central Coast of California.

Quoting from the Federal Register:

“The goal of the PACPARS is to enhance navigational safety by examining existing shipping routes and waterway uses, and, to the extent practicable, reconciling the paramount right of navigation within designated port access routes with other waterway uses such as the development of aquaculture farms, offshore renewable energy, commercial space ports/re-entry sites, marine sanctuaries, ports supporting Panamax vessels, potential LNG ports and additional commercial vessel traffic.”

Addressing these goals, the ACSF believes that the greatest change to the navigational seascape in the Central Coast of California are the proposed offshore wind (OSW) farms which are very likely to be installed northwest of Morro Bay. Currently coastal ship traffic runs right through the area proposed by BOEM for OSW development. Tow boats with barges tend to run shoreward but close to the proposed area.

It is clear that large vessel traffic will not be able to pass through these wind farms, consisting of as many as 350 floating turbines. Thus, if the Coast Guard seeks to accommodate these new structures, ship traffic will be displaced. This will cause potential safety concerns, and effectively further limit--beyond the footprint of the wind farms—fishing area.

Safety

- Assuming that large vessel traffic is displaced farther offshore due to the wind farms and to avoid transiting the Monterey Bay National Marine Sanctuary, traffic will now be upwind of the prevailing wind direction. The wind farms will constitute a new navigational hazard to be avoided. Any vessel which has a power or other emergency which results in a loss of ship control and is upwind of the farms could, in short order, drift into these floating turbines. Given the distance from shore, which is in excess of 30NM, it will take shore-based rescue vessels hours to reach a stricken vessel. Should a large vessel strike a floating turbine, there would be a danger from its massive spinning blades, as well as sinking or destroying the floating structure, or having it break free of its moorings and move through the wind farm. Accidents involving multiple turbines could endanger the state's power grid.

It is recommended that large vessel traffic be routed at least ten miles west of wind farms to allow a time buffer for an emergency response, as well as reducing interactions with whales.

- Questions: May we assume the USCG will view floating wind turbines as it views moored weather buoys? If so, will the requirements for lights, radar reflectors, and an AIS transponder be adequate for their size? Will USCG requirements for marking a mooring field also apply, and if so, are they adequate? We assume the FAA will have additional requirements.
- There has been considerable evidence from east coast wind farms that conventional marine radars do not work well inside or near the turbines. An obvious safety factor, the USCG should investigate this problem and if true, mark charts accordingly and use all its authority to require BOEM and/or OSW developers to provide modern technology, such as pulse-compression radar, to fishermen and other mariners utilizing the wind farm areas to address this concern.
- Fishermen request that the USCG to require BOEM to include a two nautical mile transit lane(s) for small vessel traffic in OSW lease planning. These lanes should separate each of the two or more leases that BOEM is likely to award, and be set prior to bidding so the lanes are not in leased areas.

Further, the transit lane must be well-lighted. Similar lighting should surround the wind farm to make its location clear.

This is a safety mitigation, allowing small vessels encountering bad weather a quicker route to port than having to go around 376 square miles of wind farms. This requirement should be in place prior to OSW leases being awarded by BOEM.

Addressing concern about the effects of the wind farms on sea life, the USCG should be aware that the ACSF will also be requesting BOEM to establish, pre-lease, a scientific study control area of approximately ten to sixteen square miles inside the wind farm. This control area could be included in a transit lane, perhaps widening the lane at a certain location.

- Fishermen on multiday trips, often fishing alone, will frequently drift at night for sleep. The ten-mile buffer west of the wind farms that the ACSF proposes would also provide a safety buffer against drifting fish boats being run down at night, even when displaying proper lighting and radar reflectors, by ships.
- Responding to vessels of any size in distress inside a wind farm will be a significant safety challenge. Their great distance from shore, along with it being unlikely that aircraft will be able to be used inside the farm, will require the USCG to specifically plan for SAR calls to the area.
- The USCG should require each floating structure to have a boarding ladder as well as an emergency communication device to shore.
- Wind farms will be serviced by relatively large vessels, between 100-350 feet in length. The OSW companies should be required to work with local fishermen to agree upon and designate traffic lanes for these craft. This can help avoid conflicts with fishing gears and operations.

Fisheries displacement

- As referenced above, wind farms will displace existing, long-established fisheries for tunas, sharks, opah, swordfish, sablefish, and groundfish. Moving large vessel traffic outside the wind farms will further limit fishing opportunity, as certain gears are not likely to be safely used within known shipping lanes. This lost fishing opportunity will be yet another economic loss for fishermen and their communities.
- Being likely that wind farms will force towboat and barge traffic closer to shore, conflicts with commercial Dungeness crab gear may occur. This could produce another loss of fishing grounds, or the loss of fishing gear...both with socioeconomic costs for fishermen. Additionally, moving this traffic closer to shore can produce more interaction with migrating and feeding whales.

One recommendation of the PARS could be to disallow new offshore structures in areas that interfere with established vessel traffic, and/or cause safety issues and fisheries displacement.

The ACSF recommends that serious consideration be given to the option of limiting the size of OSW leased area to allow large vessel traffic to flow in its established routes.

Thank you for considering the comments and recommendations of the Alliance of Communities for Sustainable Fisheries.



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CC BOEM



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