

# CALIFORNIA FISHERMEN'S RESILIENCY ASSOCIATION

1118 6th St.  
Eureka, CA 95501

Michael F. McAllister  
Vice Admiral, USCG Pacific Area  
Federal eRulemaking Portal <https://regulations.gov>. Docket #USCG-2021-0345

October 21, 2022

Re: Coast Guard Traffic Plan (PAC-PARS)

Dear Vice Admiral McAllister,

Please accept these comments on the Port Access Route Study

In January 2022, seven Northern California port commercial fishermen's associations formed the California Fishermen's Resiliency Association, a California nonprofit Mutual Benefit Corporation. The California Fishermen's Resiliency Association (CFRA) now serves as a "point of contact" and negotiator for fishermen with developers of offshore wind power, telecommunication and energy transmission subsea cables, and offshore mineral extraction projects. The CFRA represents all fisheries and gear types through its member fishermen's associations which include the ports of Crescent City, Trinidad Bay, Humboldt Bay, Shelter Cove, Fort Bragg/Noyo, Bodega Bay and San Francisco. Planning is underway to expand the CFRA membership to include California port fishermen's associations of Central and Southern California.

The CFRA is structured to encourage statewide cooperative policies and protocols related to offshore wind power and cable projects in a way that protects fishermen and fishing communities from impacts that result from these developments and allows California to move towards realistic renewable energy goals statewide.

Commercial Fishermen continue to oppose the siting of OSW projects on community fishing grounds.

We wish to begin by reiterating pertinent comments to your office made by the Alliance of Communities for Sustainable Fisheries (ACSF) concerning the impacts to commercial fishing and vessel safety from wind power development. They are as follows:

### **Safety**

- Fishermen request that the USCG 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.
- Fishermen on multi-day 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 fishing boats being run down at night by ships, even when displaying proper lighting and radar reflectors.
- 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.
- 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**

- Being likely that wind farms will force tow boat 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.

In addition to the above concerns raised by the Alliance of Communities for Sustainable Fisheries, the CFRA member port fishermen's associations are extremely concerned about the persistent rumor that the port of Humboldt Bay will be repeatedly closed throughout the entire lifespan of OSW operations to accommodate the passage of OSW components in and out of Humboldt Bay.

The average beam of cargo vessels operating in the Humboldt Bay Federal channels is 105 feet. The federal channel width in the entrance, main channel and westerly reach is 400 feet.

Floating wind power units presently being proposed from the Humboldt WEA have beams in excess of 300 feet! Movement of these units will require up to five ocean service tow boats.

Meanwhile, the West Coast commercial fishing fleet operating out of and into Humboldt Bay will require continuous and uninterrupted twenty four hour access to this harbor. The CFRA membership requests that the Coast Guard safety plan to exactly state that fishing vessel transit in and out of Humboldt Bay will not be restricted or closed and the Coast Guard will provide fishing vessel safety escorts during OSW operation as required

If the closure of the port of Humboldt Bay to “ingress and egress” wasn’t enough, we are now being told that it is possible that as many as a dozen floating turbine units may require months long mooring in Humboldt Bay as the owners of those units wait for flat weather and spring tidal series in order to tow those units to the WEA. Humboldt Bay is a shallow estuary in which medium to deeper draft vessels constrained by draft are limited to operation in the Federal “in bay” channels.

1. Where could these units possibly be anchored?
2. How will the Coast Guard accommodate multiple anchor rodes per unit each requiring adequate scope to resist dragging in this restricted space?
3. How will the Coast Guard balance the wind power developers demand for accommodation and turbine unit storage in the federal channels of Humboldt Bay and the continuous requirements of safe passage within those same channels for all other vessel traffic?

The commercial fishing fleet is now and will be the largest recipient of generations of negative impacts from OSW industrialization of our community fishing grounds and harbor facilities. To contemplate yet another major restriction on fishing families and our community, pushes the established, traditional activity of commercial fish harvest that much closer to failure and collapse.

Ken Bates, President  
California Fishermen’s Resiliency Association