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**THE BUREAU OF OCEAN ENERGY MANAGEMENT (BOEM)  
THE OREGON DEPARTMENT OF ENERGY (ODOE)  
OFFSHORE WIND ENERGY June 21, 2022**

Harvesters, processors, marine suppliers and more all benefit from Oregon's sustainable fisheries. Fishing-related jobs can make up as much as 18-20% of the earned income in Coos County annually and the seafood industry supports thousands of jobs in rural Oregon. A fishing dollar turns over many times in the community and an authentic working waterfront is also a tremendous draw for the tourism industry. Coos County believes certain steps should be taken to ensure that existing ocean users and stakeholders are protected in the process with the following recommendations:

1. Throughout any development process require state and federal agencies to be transparent about the process of identifying and implementing offshore wind developments by embracing the public process that includes the Oregon fishing industry, environmentalists, coastal communities, and our state and federal political and congressional delegations, sit down with BOEM as equal partners, develop a rational process with authentic discussion, conduct the requisite EIS analysis, analyze the real costs and benefits, evaluate test sites, and develop a rational decision that minimize costs and maximize benefits to Oregon and the nation.
2. Move all Oregon call areas outside of 1,300 meters to avoid displacing current sustainable fishery activities – these fisheries have great importance to Coos County and Oregon's economies.
3. Enact a moratorium on developing large scale wind turbine farms until all the risks to marine mammals, sea birds (**SEE: H.R.4057 — 117th Congress (2021-2022)**), fisheries and the marine environment are clearly understood.

## Albatross and Petrel Conservation Act HR 4057

This bill authorizes the United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) to issue regulations to implement and enforce the Agreement on the Conservation of Albatrosses and Petrels, done at Cape Town, South Africa, on February 2, 2001.

Specifically, the USFWS and the NMFS may act to protect albatrosses and petrels and their habitats. The bill prohibits the taking of an albatross or petrel without a permit, authorization, or exemption. The FWS, in consultation with the NMFS, may authorize the taking of an albatross or petrel under exceptional circumstances or incidental to otherwise lawful activities. The bill gives the USFWS, the NMFS, and the Coast Guard authority to enforce this bill. Finally, the bill authorizes cooperation with other countries to achieve and maintain a favorable conservation status of albatrosses and petrels. Will endangered sea birds that are killed by off shore wind mills violate US international endangered bird treaties with Central and South American countries?

4. BOEM should meet all NEPA requirements and conduct a comprehensive programmatic EIS **before** leases are granted instead of at the end of the process. This includes cumulative impacts and transmission line impacts. Include an analysis of the transmission lines that will bring the energy to shore and examines the cumulative impacts to current ocean users from adjacent wind energy developments in Northern California and Washington. Migratory birds, sea turtles, salmon, whales, etc. can sense variations in Earth's magnetic field as they travel huge distances across the globe to the same mating grounds or beaches year after year.

Now that we know more about how salmon navigate as described in a study published February 6th in *Current Biology* scientists have found that salmon use Earth's magnetic field like a map, much like hatchling turtles. Birds, by contrast, use magnetic fields more like a compass: They know what direction they're facing, but they need other information to know where they're supposed to go. The study also found that the salmon appear to use a combination of two characteristics of the magnetic field at a given location: its intensity, or strength, coupled with its inclination, or the angle of the field compared with Earth itself. When fish were exposed to a mismatched field, such as a northern intensity paired with a southern inclination, or vice versa, they became disoriented, indicating that they use both types of information to figure out where they are and where they should go.


5. In the absence of a comprehensive peer reviewed economic analysis (as part of an EIS) there is no real understanding of the potential economic impacts to coastal communities and the state of Oregon, and relevant tradeoffs. If we assumed that the Call areas were completely developed the loss of Oregon fishing revenues may total 10-20% or more of today's value. That would equate to an annual loss of \$20-\$35 million in ex vessel value and \$50-\$90 million in local and state household income. Over thirty years (the equivalent of the life expectancy of a windmill) that would equate to the loss of more than a \$500 million to \$1 billion in ex vessel value and \$ 1.4 to \$2. 7 billion in household income.

6. Floating offshore wind does not currently exist in operation in the United States, and it is unclear whether the technology can withstand the harsh elements of the Pacific Ocean. BOEM should consider a small demonstration site (like Pac Wave) to test the technology. Given the considerable fishery values generated from the call areas and the potential impacts to marine species and ecosystems/habitats, we should slow down the process because of significant risks and uncertainties.

7. The wind energy investors should **pay for all of the onshore infrastructure.**

8. I am not in favor of "Feed In Tariff" which makes the rate payers responsible for making the investors whole if something goes wrong with the project. Investors should be the sole entity to risk their investments in wind energy. We know that "Feed In Tariff" is a State of Oregon issue. Feed In Tariff has already enacted in the states of Virginia and Rhode Island. Everyone that I have talked to are not in favor of the project if "Feed In Tariff" is placed into Oregon law.

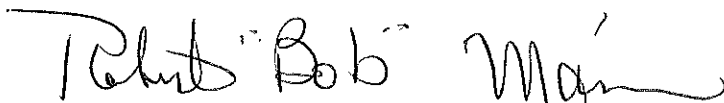
Sincerely,



John W. Sweet, Chair



Melissa Cribbins, Commissioner



Robert "Bob" Main, Commissioner