

Midwater Trawlers Cooperative • Fishermen's Marketing Association • Pacific Seafood  
West Coast Pelagic Conservation Group • Pacific Coast Federation of Fishermen's Associations  
California Wetfish Producers Association • West Coast Fisheries Consultants  
Ocean Gold Seafoods • Western Fishboat Owners Association • Oregon Trawl Commission  
West Coast Seafood Processors Association • Pacific Whiting Conservation Cooperative  
Shrimp Producers Marketing Cooperative • American Albacore Fishermen's Association

Portland Audubon • American Bird Conservancy • Oceana • Surfrider Foundation  
Oregon Shores • Whale and Dolphin Conservation • Kalmiopsis Audubon Society  
Redwood Audubon Society • Audubon Society of Lincoln City • Cape Arago Audubon Society

April 5, 2022

Doug Boren, Pacific Regional Director  
Bureau of Ocean Energy Management  
760 Paseo Camarillo  
Camarillo, CA, 93010

Re: Floating Offshore Wind Energy Siting Process in Oregon

Dear Regional Director Boren and Regional Supervisor:

As conservation and fishery organizations with interests in the Pacific Coast marine environment, we make the following comments and requests regarding the recently announced Call Areas for Floating Offshore Wind (FOSW) development off Oregon's Coast. These comments build upon previous oral and written comments submitted to BOEM by our various organizations.

Important new concerns came to light during BOEM's February Oregon Task Force meeting that highlight the need for more comprehensive analysis of both siting and construction of offshore wind, including consideration of the cumulative impact of projects in currently proposed and forecasted areas. These include:

- Domino effect of displacement: There is a strong concern that turbine areas will likely displace fishers from fishing grounds at the same time that wildlife will be displaced from foraging grounds, creating a situation where both fishers and wildlife will be crowded into smaller areas, potentially creating a new set of conflicts that need to be considered in the siting process.
- BOEM announcement of more call areas to-come in deeper waters in the future
- Inclusion of highly valuable rocky reef habitats for fish and wildlife within call areas
- Lack of sufficient consideration of critical wildlife habitat and marine bird and mammal foraging and migration needs in siting process thus far

Our organizations intend to submit additional specific comments during the formal comment period, but at this juncture, we want to underscore key points about siting before that process starts.

### **NEED FOR MORE ROBUST PUBLIC PROCESS & ANALYSIS PRIOR TO SITING**

We strongly urge BOEM to prepare a Programmatic Environmental Impact Statement (PEIS) for all offshore wind energy planned in the California Current. Siting of wind energy facilities is the single most important decision that will be made for wind development off Oregon's Coast. However, the current BOEM process leaves meaningful environmental analysis through the National Environmental Policy Act (NEPA) until the end—*after* the fundamental siting decisions are already made. This is a highly problematic shortcoming, with multiple projects that impact migratory species and mobile fisheries at various stages of review along the West Coast, with more developments added in the future.

Oregon's offshore waters are extremely productive for marine life and fisheries—part of one of only four major upwelling Eastern Boundary Current ecosystems in the world. Floating Offshore Wind (FOSW) energy is an entirely new technology that has yet to be tested in conditions as rough and rugged as the North Pacific. Given strong potential for renewable energy benefits but also for significant impacts on marine ecosystems, including at-risk species and fisheries, the siting of FOSW demands a more robust and transparent review.

Conducting a comprehensive NEPA analysis at the start of the planning and leasing process need not create excessive delays but can instead provide for greater efficiencies later when project-level NEPA analyses can tier off the regional PEIS. Establishing a baseline analysis of all critical issues on a broader scope now will help avoid unnecessary delays in the future.

Additional benefits of conducting a PEIS earlier include:

- Providing BOEM with the widest possible range of alternatives
- Allowing BOEM to engage with more information and more diverse perspectives earlier in the process
- Allowing time for results of research now underway to inform project siting and design
- Increasing project viability by identifying and addressing environmental issues and resource conflicts early in the process

To date, BOEM has not given a valid reason for rejecting a programmatic approach, which could more effectively minimize conflicts among stakeholders and impacts to wildlife and our fisheries while building broader confidence in the process that ultimately leads to better outcomes.

### **SUPPORT FOR STATE OF OREGON'S REQUEST TO REMOVE ALL ROCKY SUBMARINE AREAS**

We support the State of Oregon's request to remove all rocky submarine habitat from the proposed Call Areas, as articulated by Governor Kate Brown's Office and the Oregon Department of Fish and Wildlife at BOEM's February Oregon Task Force meeting. This includes removing the Coquille Bank from the Bandon Call Area, Rogue River Reef from the Brookings Call Area, and Heceta Bank from the Coos Bay Call Area. We also support removing the Port Orford Stewardship Area from the Bandon Call Area.

Rocky undersea topography provides for structure that creates hotspots for marine life, including the invertebrates that form the base of the ocean food chain both for wildlife and fisheries.

In conclusion, the extremely high economic, social, and ecological values of Oregon's marine resources demand the highest level of consideration—in terms of public engagement, scientific, social and economic analysis, and ultimately stewardship. We ask that you consider these values important to all of us and urge you to prepare a PEIS as the first step in your process.

Sincerely,

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Oceana

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Colleen Weiler  
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Cc: BOEM Director Amanda Lefton  
Senator Ron Wyden  
Senator Jeff Merkley  
Rep. Kurt Schrader  
Rep. Peter DeFazio