



# MIDWATER TRAWLERS COOPERATIVE

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Mr. Doug Boren, Regional Director  
Bureau of Ocean Energy  
Management  
Office of Strategic Resources

June 28<sup>th</sup>, 2022

Dear Mr. Boren:

Midwater Trawlers Cooperative (MTC) represents 31 trawl catcher vessels, most boats are home-ported in the state of Oregon. MTC members fish for groundfish (like rockfish, flatfish, and sablefish) and we are also major participants in the at-sea and shoreside sectors of the Pacific whiting fishery. MTC vessels are between 80 and 120 feet long and these businesses support over 500 families directly. It is not unusual for an MTC vessel to have an annual payroll of more than one million dollars. MTC member businesses support thousands of additional jobs through seafood processing, marine suppliers, shipyards, and a whole host of additional secondary and tertiary businesses. Many of the Oregon MTC vessels are home-ported in Newport, which is a truly authentic working waterfront that in turn creates a huge draw for tourism. Millions of people flock to the Oregon coast each year to be immersed in the beauty and marine industry of coastal towns up and down Highway 101. MTC members are an integral part of the fabric which makes up coastal Oregon.

***Fishermen are conservationists!*** MTC members, like many commercial fishermen, are staunch stewards of ocean health. Fishermen are first-line environmentalists who spend their lives on the water. Fishermen support sound and robust regulations that they help create through a transparent fisheries management process with the National Marine Fisheries Service. We are deeply concerned about the sustainability of our ocean resources and we have a demonstrated track record of taking strong action to protect the marine environment- even when it has been an economic hit to fishing businesses. Please accept these comments as not just “complaints” from the commercial fishing industry, but rather consider these recommendations in the spirit they are intended – from environmental stewards of the ocean who also happen to be fishermen who feed the world with a low-carbon footprint sustainable protein.

***The current BOEM process is severely flawed.*** It is set up for one outcome – to lease land for offshore wind development to meet a political promise of 30 GW of offshore wind being generated by 2030. There are no off-ramps and no opportunities for authentic engagement or discussion on the merits of offshore wind. Even though hundreds of Oregonians have expressed concerns and made

recommendations for alternative approaches, BOEM has, to-date, not made adjustments to the process. Coastal legislators together with local municipalities representing tens of thousands of Oregonians have provided concerns verbally and in writing. BOEM even chose to disregard most of the recommendations from Governor Brown in her January 2022 letter. Even now, BOEM is requesting comments specific to the call areas only, with no room for the dialog that was promised by Director Lefton. BOEM points to the Oregon Renewable Energy Task force as the justification and “yes” for moving forward with offshore wind, even though recent task force meetings did not include explicit support for moving the BOEM process forward. At the same time, HB3375 did not commit the State to any deployment targets, instead the State was approaching offshore wind the “Oregon” way, which means studying the pros and cons before diving blindly into something as significant as offshore floating wind. BOEM has taken public comment through the last couple of years, both formally and informally – but the agency has not made any meaningful adjustments to the process. Extending the comment period on the call areas by 15 days and dropping the Bandon area (which technically should never have even been considered) does not comprise authentic engagement or demonstrate the agency’s “stated” commitment to transparency and collaboration.

***Abandon the current BOEM process for Oregon and start over!*** For several reasons MTC believes the current call process off Oregon should be paused. The BOEM process is dysfunctional and is posing considerable environmental and economic risk to the California Coastal Current and associated upwelling, the livelihoods of coastal Oregonians and the average citizen who will be saddled with higher energy costs. We strongly suggest consideration of a test site for one turbine prior to moving to privatization and commercialization of our ocean. There is a very likely chance that once the study authorized by Oregon HB3375 provides results to the Oregon legislature and with consideration given to the enormous concern from constituents that the State of Oregon will formally request a pause as well. Oregon’s Coastal Caucus, made up of coastal legislators from both houses and both parties sent a detailed letter to BOEM regarding the Oregon process, and note that MTC and many others strongly support the recommendations in their letter. As stated above, multiple Oregon municipalities (cities, ports, counties) representing tens of thousands of Oregonians have approved resolutions or sent letters recommending the same and we expect more resolutions to be approved in the coming days.

***There is no portion of either Oregon call area that has not been fished.*** These areas are extremely productive fishing grounds. More than 25% of all Pacific whiting harvested in the last decade has come from these areas – that’s hundreds of millions of pounds of Marine Stewardship Council (MSC) certified sustainable seafood. These areas also support robust commercial fisheries for groundfish, albacore, salmon, Dungeness crab and pink shrimp – many of which are also MSC certified. Significant recreational fishing also occurs in these areas. In essence, BOEM is now pitting fishermen against fishermen to determine which part of the call areas is the least important for fisheries. Every part of the two call areas is important to some commercial or recreational fishery and those who depend on that fishery. No fishery should be deemed “less” important than others and for BOEM to

make that determination is inappropriate and arbitrary, especially with the agency's clear lack of knowledge regarding fisheries and the incomplete data BOEM has collected. Fisheries like groundfish and whiting are the "glue" that holds together shoreside processing infrastructure and employees so businesses can also process the seasonal pulse fisheries like crab, pink shrimp, salmon, and albacore. Commercial fisheries off Oregon are complex, with a myriad of seasons, gear types, species targeted and state and federal regulations. BOEM understands very little about commercial fishing, as evidenced by several comments made by BOEM employees in public meetings. Developing offshore wind energy in any part of the Oregon call areas will be disruptive to current ocean users, including food providers, jeopardizing food security in multiple ways.

***BOEM has the authority to adjust the current Oregon process and should abandon the current race to site offshore wind with a more measured, scientifically supported approach utilizing a test turbine first while completing a robust analysis on impacts prior to identifying any call or wind energy areas – and certainly prior to any leases being auctioned off.*** Consideration of call areas outside of 1,300 meters is important to minimize disruption to most fisheries, but it is important to note that some fishing does occur in those depths and all the environmental concerns still exist. At least one offshore wind company has stated their technological abilities would allow them to operate turbines this deep, while other companies say moving this far offshore will be too costly for them and cut into their profits. BOEM should not squander the environment or the coastal economy to meet a political promise made by the current administration.

There is ample justification for slowing this process down and doing it right:

1. Current call areas include well-known and well-documented prime fishing grounds
2. Concerns from BOEM/Oregon task force & local municipalities
3. Inadequate and incomplete fisheries data
4. Lack of understanding of how fisheries operate
5. Incomplete environmental impact studies
6. Incomplete or inadequate research projects
7. Unacceptable impacts to endangered marine mammals and birds
8. BOEM's arbitrary "consideration" process and the decision hierarchy
9. Is offshore wind even a good idea?
10. Unproven technology and lack of upfront analysis of cumulative impacts
11. Negative impacts to food security
12. Negative impacts to underserved communities
13. Overwhelming push back from Oregonians
14. Current Statutes not designed for offshore wind development

### **Call areas are in Prime Fishing Grounds**

The two Oregon call areas encompass prime fishing grounds for a variety of species and as noted above, there is no part of the current call areas that has not been fished by someone. In terms of Pacific Whiting, over 540,859,396 million pounds has been harvested by the at-sea fleets alone

between 2012 and today. Between 2017 and today over 15.7 million pounds has been harvested by the shoreside whiting fleet. See Sea State attachment for additional information and data. Major regulatory changes have also taken place during the last five years, mainly elimination of the trawl RCA which includes grounds within the call areas. These large areas had been closed to trawl fishing for close to two decades to rebuild stocks of concern. Now fully rebuilt, these stocks are providing sustainable harvest and economic benefits to participants and those fisheries are occurring within the call areas. Historical data does not capture this effort unless you go back more than 20 years and the inadequate data BOEM is relying on currently to make siting decisions does not capture this activity because the data is incomplete and does not include fishing effort in recent years. MTC vessels spend several months each year fishing groundfish and Pacific whiting in these two call areas and we are only a part of the large fleet of fishermen who rely on these areas.

### **Concerns from Oregon/BOEM Task Force & Local Municipalities**

BOEM has indicated that they are currently only interested in hearing feedback during this public comment period about the call areas themselves, not other concerns about the BOEM process or people's opinions regarding offshore wind energy development. *This sends a clear message to stakeholders that BOEM does not care if Oregonians are against moving forward with offshore wind development in its current form.* And it isn't just a few Oregonians. At this point several local municipalities representing tens of thousands of Oregonians have passed resolutions and submitted letters to BOEM asking for the process to slow down among other things. Additionally, Oregon's Coastal Caucus sent a letter to BOEM urging the same. Blindly rushing forward and using the BOEM/Oregon task force as the justification for doing so is disingenuous. During meeting 10 of the task force held in February 2022, many members of the group expressed outrage about the BOEM process and lack of engagement with task force members regarding the call areas being considered. Public comment provided at that meeting was overwhelmingly negative towards the call areas and BOEM approach. It is misleading to state that the task force is in full support of the current process or areas, as neither was expressed either informally or formally at the February meeting or since. If anything, concerns about the process and call areas are all that has been shared since the February meeting.

BOEM employees have said in public meetings the only reason they are pursuing offshore wind sites off Oregon is because of the interest from the state of Oregon in doing so, as if forming a task force and holding meetings is a check mark in the support column to move forward. The task force is designed to only include membership of government employees and elected officials which sends a clear message to the public that their input is not important. This is further evidenced by the fact that the task force meetings officially adjourn before public comment is taken. Only nine of the 48 members are elected local officials and the tribes are only recognized with four seats. The remaining 35 members are government employees. The tribes and local elected officials have expressed concerns- both in task force meetings and outside – more than half the local municipalities on the

task force have already sent in resolutions/letters to BOEM recommending the process be slowed and proper analysis on environmental and economic impacts be done before moving forward. Additional resolutions/letters have been sent to BOEM from other Oregon municipalities that are not recognized on the task force. Tribal representatives have also expressed concerns in public meetings about not being properly or formally engaged in this process. This is unacceptable.

### **Inadequate Fisheries Data**

It is stunning how little fisheries data BOEM has collected. Even during the last few weeks of the public comment period on the Oregon call areas, huge gaps in the data still exist and BOEM employees freely admit this. Why is a federal agency relying on the public to provide state and federal fisheries data that should already have been collected from available sources? This data should have been collected and utilized to determine the draft call areas were rational selections! In most cases, the data held by BOEM ends in 2017. Other data is only through 2019. Relying on VMS data is wholly inadequate to capture fishing activities – it does not represent the effort, landings, value, or complexities of fishing and it is not used by all fishing vessels. At the February task force meeting, the point was made several times by BOEM employees that there was a lot more to be done on collecting fisheries information. However, at the BOEM/industry meetings during the week of June 13<sup>th</sup>, it was not clear that any additional information had been collected even four months later. If BOEM had collected all the data available on fisheries effort, then it would be clear that there is no portion of the call areas that have not been fished by someone at some time in the last decade. Lack of fisheries data (either fisheries-dependent or fisheries-independent) is a real threat to the siting process, especially when combined with BOEM's clear ignorance about how fisheries are conducted and operate. What's more, the economic data cited in the federal register notice announcing the Oregon call areas is incorrect. The narrative does not mention Pacific Whiting as one of the highest valued fisheries on the coast, only pink shrimp and Dungeness crab. In many years whiting has garnered more value than shrimp – this is one more example of how the fisheries data BOEM is using is incomplete and/or flawed.

### **Lack of Understanding on How Fisheries Operate**

It was disturbing to hear the answer from a BOEM decision maker when asked to describe, in basic terms, how a trawl vessel operates and how trawl vessels differ from other types of vessels. The BOEM Regional Director was unable to answer the question and admitted so, confirming what many already believe. BOEM employees do not understand the complexities and nuances of fisheries, yet they are making recommendations and decisions that will impact our fisheries for the rest of our lifetimes. The basic understanding of how a trawl vessel or any other fishing vessel operates is critically important to understanding fishing data. How long does a trawl vessel haul a net? What are the space requirements for hauling back? What types of habitats are suitable for trawl fishing? Does a trawler work in a straight line or curved? What types of marine structures can trawl nets get caught

on? How does trawling for whiting differ from trawling for pink shrimp? BOEM clearly does not understand even the basics of fishing and fishing gear.

Beyond the basics of gear and how vessels prosecute various fisheries, Oregon's commercial fishermen face a myriad of challenges while pursuing their livelihoods. There are existing closed areas (marine reserves and essential fish habitat areas) where fishing cannot occur. There are additional areas that fishermen voluntarily stay out of to minimize incidental catch of non-target species. There are gear restrictions in certain areas – some are required, and others are common sense, so you don't lose expensive gear. There are changing ocean conditions that have resulted in species showing up in different areas and in different amounts than we have seen before. There are marine mammal and endangered species considerations including critical habitat designations for the Southern Resident Killer Whales and Endangered Humpback whales. There are capacity and processing infrastructure considerations and balancing a variety of fishery harvests that impact timing of seasons. The fish we target do not understand boundaries the way humans do- the fish are following their feed and preferred water temperature – which is also changing as the climate changes. Even without floating offshore wind farms, the ocean off Oregon is an obstacle course, not an open grassy plain. Federal fisheries in the United States are the most highly regulated fisheries on the planet. All these regulations and spatial considerations must be understood to make informed decisions on siting of offshore wind activities.

In addition to how fisheries operate, there is the questions of why they operate. Commercial fishermen are food producers! Commercial fishing businesses are generally multi-generational fishing families with deep roots in the fishing culture and communities of the West Coast. There is a sense of place when you are an integral part of a fishing community. When fishermen lose access to traditional fishing grounds, they aren't just losing their livelihoods, they are losing their identity – their place in the world. When BOEM or other pro-wind advocates suggest fishermen can be retrained to work on offshore wind activities or to “ferry people and supplies to and from the turbine farms” it shows a complete lack of understanding of what it means to be a commercial fisherman who feeds the community, the nation, and the world. None of this seems to be considered by BOEM – as BOEM always says, “we only lease land.”

### **Incomplete Environmental & Economic Impact Analysis**

It does not make sense to analyze environmental and economic impacts after the construction plan is submitted. There is plenty that can be known now if the agency expresses the will to do so. BOEM's work on analyzing environmental impacts from floating offshore wind installations is undeniably inadequate. Environmental Assessments (EAs) which have been completed for Northern California wind energy areas are flawed and understate the risks and impacts to the ecosystem and those who rely on it to live. These EAs would never pass muster in the federal fisheries management process. New studies recently released indicate that commercial offshore wind farms on the West

Coast will impact the upwelling conditions that help sustain life in the Pacific Ocean. Altering the upwelling could have dramatic impacts on fisheries and the ecosystem. In terms of economics, with the lack of fisheries data that has been collected in the rush to site these turbine farms, there seems little interest from BOEM in understanding the economic impact for harvesters, processors or the communities that depend on fishing. Is BOEM remotely aware of what the value of the seafood caught in the two call areas is? Or when the scales tip so that loss of access to fisheries results in loss of a business? We know that siting wind farms within either of the call areas will have a negative impact on economics – this is certain. We believe siting wind farms could have negative impacts on the upwelling provided by the California Current, as evidenced in recently published studies. What we don't know about either, is whether BOEM cares enough to identify these impacts upfront – until this is done, and regulators go into the process with eyes wide open, this will remain a deeply flawed and suspect process.

A programmatic EIS should be done up front, not at the end of the process. BOEM states that they cannot do a deeper dive until a construction plan is submitted. This is disingenuous at best. There are generally only three types of floating technology that can be utilized off the West Coast. We can estimate the number of turbines that will be needed to generate 3 GW of energy. We know the turbines will be strung together somehow to collect the energy from each turbine. That energy is all funneled to a floating substation and then from the floating substation a large transmission cable will be in place to bring that energy onshore and plug into the grid on land. There are only a few areas in the grid near coastal ports that can upload that energy. With what is known, a lot could be considered in terms of impacts and this should be done upfront, instead of at the end of the process, after rents are being paid.

#### **Incomplete or Inadequate Research Projects**

BOEM likes to point to many ongoing studies as ample justification answering questions about risks to marine mammals, endangered birds, crab behavior, etc. These answers distract from the issue at hand because the majority of these studies are not complete, and will not be completed anytime soon. Actual results from various studies should be available to the public well before call areas and wind energy areas are identified and before leases are auctioned off. Otherwise, they are afterthoughts in the process. Any number of ongoing research projects are not set to be completed for several years, though BOEM is aiming to auction off ocean land to multi-national corporations by Fall 2023.

#### **Unacceptable Impacts to Endangered Species and Birds.**

Even without the completed studies, we know that there will be impacts to birds and whales. As one BOEM employee pointed out in a recent meeting, it is all about the “risk” to the populations. We are shutting down important fisheries because of the risk to humpback whales, and only doing so because whales are “in the area”. How are humpback whales going to navigate 500 square miles of

ocean filled with 250+ floating wind turbines that are all tethered to the seafloor with 3-5 lines of chain and then all tethered together in a daisy chain? How does the electromagnetic fields given off by the turbines and cables impact how whales migrate? How does the noise made by the turbines impact whale migration? How will the turbines impact salmon behavior? If salmon is negatively impacted, how does that harm the Southern Resident Killer Whale since they only eat salmon? Evidence is available that shows hundreds of thousands of birds have been killed from onshore wind installations. We have fixed gear fisheries that can only “take” two albatrosses during a certain timeframe or risk fishery closure and an ESA consultation. What will that threshold be for floating wind turbines?

### **BOEM’s Arbitrary Decision-Making Process**

One of the most frustrating aspects of the offshore wind development process lies in the complete lack of transparency in how decisions are made on where to site turbine farms. On the one hand, they take in a lot of public comment – but on the other hand, it is not clear what happens with that public comment. For example, how is the information shared internally and how is it presented to decision-makers? How do decision-makers prioritize the different ocean users and how do they assign values to those priorities? What are the metrics that BOEM uses to determine when negative impacts to the environment or marine mammals or stakeholders are too much? It has already been established that BOEM considers collateral damage to fishermen and communities and even the environment as both expected and accepted to meet the political promise of 30 GW of offshore energy in the water by 2030. (Vinyard Wind decision document and recently released Ocean Wind DEIS). How does BOEM define “consider”? The decision hierarchy moves from “do no harm” to “try and offset that harm” to “compensate for harm”. No discussion on whether this is a good idea in the first place occurs. BOEM simply says the task force is the conduit for moving forward, we will take public comment and feedback and we will consider it all. Consider it how? BOEM will say that the “no action” alternative is always an option, but it is an option that has never been selected where offshore wind is considered. Decision-making and debate are done internally, with no transparency.

### **Is Offshore Wind Even a Good Idea?**

Many have asked “why offshore wind, why not on land and/or why not expand other technologies like solar?” BOEM’s response is that it isn’t their job to determine if offshore floating wind is more viable or reasonably priced versus other sources of renewable energy – only that it is the agency’s job to “lease land” for renewable energy development. The manufacturing of offshore wind turbines is carbon and copper intensive. The turbines are maintained using massive amounts of oils and lubricants that can leak into the ocean. The blades are not recyclable, and their useful life is less time than a project may become profitable. There are huge landfills filling up with discarded blades that will live there into eternity, and more are being added to the waste all the time. The cost of offshore floating wind is twice as much as fixed offshore wind and four times as much as onshore wind. The timing it takes to get an offshore wind project in place is long. If we are serious about tackling the



climate crisis, we should be taking actions now – not in ten years. Current actions include increasing solar and expanding onshore wind – the National Research Energy Lab has reported that the onshore resource potential in Oregon is more than enough to provide energy to power the state of Oregon and even export power to other states. An honest discussion about whether offshore floating wind is a good idea at this time in this place should absolutely be had. Instead BOEM denies it is within their charge to consider these things and they move forward in their bureaucratic silo in a race to privatize a public resource- our ocean.

### **Unproven Technology and No Cumulative Impact Studies**

Floating offshore wind does not currently exist anywhere in the world in a commercial setting. There are three demonstration sites in Europe which are located in completely different ocean and weather conditions than what the Pacific Ocean has to offer off Southern Oregon. It is unclear whether an 800-1,000 foot tall wind turbine can be constructed on shore in Oregon and towed out to its location standing upright more than a dozen miles offshore without tipping over. It is even more unclear whether they can stay secure being tethered to the ocean bottom during one of the Pacific's famous fall storms. The US Coast Guard and others have been trying to develop a weather buoy that won't break off in rough conditions for more than 100 years and this has yet to be accomplished. What about the ability of these structures to withstand a 9.0 earthquake and accompanying Tsunami which will happen? Geologists are clear it is not a question of "if" but "when".

Why not wait and see how the technology actually performs in other US locations before rushing to put a commercial farm off Oregon? And where are the cumulative impacts when choosing call areas? The northern California areas are relatively close to the southern Oregon areas. When fishermen are displaced from both areas, where is the economic analysis of those impacts? There are considerations that need to be addressed upfront, not ignored. It is the same for environmental impacts. Displacing fishermen could cause localized depletion and greater conflicts between gears and fisheries in smaller areas. Migrating whales and birds will have a gauntlet to travel safely through, not just one wind farm area. All these cumulative impacts must be identified upfront if wind turbine placement is going to be responsible.

It is no secret that fishermen will pay the price in the "balancing" act that the agency will undergo. Consideration is first given to offshore wind developers and what their technological capabilities are. Next comes maritime navigation. Consideration will be given to submerged submarine cables. The Endangered Species Act and Marine Mammal Protection Act will dictate certain activities or exclusions if they are consulted properly. Whales, turtles and birds will be prioritized. The Department of Defense clearly outweighs others as a priority. Tribal considerations and submerged landforms must be a priority. It seems as if viewsheds even take a priority over food production. The agency may say they balance all the needs of ocean users and stakeholders, but it is clear from what has occurred on the East Coast and in Northern California that this is simply untrue.

### **Negative Impacts to Food Security & Underserved Populations**

Closing off any portion of the two Oregon call areas to place wind turbine farms will have an impact on food security. Focusing on the Pacific whiting fishery, the direct results of loss of access to that fishery will be felt not just by harvesters and processor, but by consumers. Pacific whiting is a low-carbon, inexpensive protein choice. One in six children in the United States is food insecure. Some children only get a healthy meal during school lunch. More than 46 million Americans are relying on food banks and food pantries to supplement their meals. Millions of servings of Pacific whiting are being consumed from school lunch programs and through food pantries. Reducing or eliminating this healthy option for food insecure people is a direct threat to food security. Processing plant workers, vessel crew members and onshore support jobs rely heavily on minorities and underserved populations. These are well-paid family-wage jobs that lift underserved populations out of poverty and into more stable lifestyles. We should not create a food shortage problem trying to solve the energy crisis. This consideration alone should justify abandoning the current process.

### **Overwhelming Push Back from Oregonians**

While BOEM may not want to hear or accept it, there is overwhelming pushback from rushing forward with offshore floating wind off Oregon. The concern is coming from a variety of people above and beyond the fishing industry. From marine biologists to environmentalist, to college kids. The public is learning more and more about the known and unknown risks to coastal communities and the environment. More than a thousand people have shown up in the last few weeks to a host of different meetings, all voicing their strong concern about this process. Oregonians do not want floating offshore wind foisted upon them under the guise of green energy if that technology is going to cause more harm than good. While BOEM has the luxury of saying it is not their job to make judgement calls, just to lease lands, this does not absolve BOEM from making decisions that create legacy disasters! Consider the dams and what was done under the best of intentions to implement renewable energy – we have not only seen an almost complete extinction of salmon populations, but have spent billions of tax payer dollars trying to fix that catastrophe. Is there a moral imperative to move to more renewable energy and away from fossil fuels? Probably. Is there a moral imperative to foist offshore floating wind on Americans? Absolutely not.

### **Current Statues not Designed for Offshore Wind**

The current statues that dictate BOEM's activities and actions were not designed to contemplate offshore floating wind. Using those statutes as a shield for reckless and irresponsible behavior that risk the environment and our coastal economy is careless at best and criminal at worst. Rushing through projects to meet a political promise when critical consultations from other agencies like National Marine Fisheries Service and National Oceanic and Atmospheric Administration take time to be done correctly is a derelict of duty and directly reflects that the statues regulating BOEM are not equipped to deal with the current rush to offshore wind.

In conclusion, MTC members recommend that BOEM halt the current action and go back to the beginning of the formal siting process. BOEM should work more closely with impacted stakeholders and engage in real collaboration, which has not occurred to date. Holding as many meetings as humanly possible does not constitute authentic engagement. BOEM must collect the full suite of available fisheries information from state and federal sources, not pick and choose certain data sets that mislead decision makers. BOEM must be more transparent in how decisions are made and the metrics for those decisions must be provided. BOEM must do a better job with upfront environmental and economic impact analyses and should do an EIS before issuing leases. It is unconscionable to move forward in such haste, risking the environment and coastal economies in the quest for offshore floating wind. A simulation or test project should be pursued first.

Lastly, on a personal note – fishing families care about the ocean and care about the planet that they are leaving to their children and grandchildren. These recommendations are not about denying there is a climate crisis or that action must be taken. These recommendations are based on being held hostage to an ongoing process that seemingly ignores the environmental risks of rushing to place wind turbines off our coast. There is no “Planet B” as many say. The narrative that climate change is so calamitous that some destruction of our natural resources and economic harm to coastal communities is an acceptable tradeoff for implementing offshore renewable energy is unconvincing and lazy. Creating one environmental catastrophe trying to solve another makes no rational sense. Please be responsive to the thousands of Oregonians that are asking for a re-set on this process.

Sincerely,



Heather Mann, MTC

**Current Midwater Trawlers Cooperative Members, June 2022**

F/V Bay Islander, Newport	F/V Majesty, Seattle	F/V Pacific, Newport
F/V Excalibur, Newport	F/V Marathon, Newport	F/V Pacific Future, Warrenton
F/V Excalibur II, Kodiak	F/V Michelle Renee, Kodiak	F/V Pacific Ram, Newport
F/V Gold Rush, Kodiak	F/V Miss Berdie, Newport	F/V Pegasus, Newport
F/V Golden Pisces, Newport	F/V Miss Sarah, Brookings	F/V Predator, Newport
F/V Grumpy J, Warrenton	F/V Miss Sue, Newport	F/V Raven, Newport
F/V Hickory Wind, Kodiak	F/V Muir Milach, Seattle	F/V Sea Clipper, Westport
F/V Jamie Marie, Westport	F/V New Life, Newport	F/V Sea Storm, Seattle
F/V Leslie Lee, Newport	F/V Nordic Star, Seattle	F/V Seadawn, Newport
F/V Lisa Melinda, Newport	F/V Northern Ram, Newport	F/V Seeker, Newport
		F/V Winona J, Newport