MIDWATER TRAWLERS COOPERATIVE
P.O. Box 2352 | Newport, OR 97365 | 541-272-4544 | www.midwatertrawlers.org

Offshore Wind Development off Oregon / BOEM March 2, 2022

The Biden administration is fast-tracking offshore wind development. They have made a commitment to have ocean wind farm installations that can produce 30 gigawatts of energy by 2030. A tremendous amount of pressure is currently on BOEM to issue leases, because without the lease issuance, there is no way to make the deadline and deliver on the political promise.

The commercial and recreational fishing industries are not against offshore renewable energy development, we are against losing our livelihoods to accommodate wind farms. There are significant secondary and tertiary concerns that are not being considered which evidence the complete lack of understanding about the complexities of our west coast fisheries and the coastal economies that they support. The effects of offshore development and OSW arrays on protected species (birds, marine mammals, salmonids) are not known and need to be carefully analyzed. It is also highly likely that critically important federal and state research programs will be disrupted because OSW arrays are sited across research transect lines; the integrity of these research time series are important to the sustainable management of west coast fisheries.

Several themes arose at the February 25th BOEM OR Task Force meeting and were expressed across sectors including from the fishing industry, e-NGOs (including the Surfrider Foundation and local Audubon chapters), recreational users, local governments, and BOEM OR Task Force members:

- Slow down the process; provide more time to collect and analyze data.
- Conduct a comprehensive, Programmatic EIS upfront before the wind energy areas are defined, leases are auctioned off, and siting is done – there is not enough environmental and socio-economic information currently being considered to support moving the call areas forward.
- A large and diverse set of stakeholders provided input to BOEM over the last 18 months, and it appears by the proposed call areas that the information and feedback was largely ignored because of the obvious impacts these areas will have to fisheries and coastal communities.
- Who will use and benefit from the OSW energy produced at these sites? Who will buy this energy (Oregonians)? Will the energy be affordable?

Concerns with BOEM Process:

1. Leases are granted for high dollars before it is determined whether negative impacts to fishermen, coastal communities, endangered species, and the ecosystem will occur. This creates the perception that BOEM considers displacing sustainable fisheries and harming coastal communities to simply be the cost of doing business (breaking a few real eggs to make an aspirational omelet).

2. No Programmatic Environmental Impact Statement – the West Coast ecosystem, its robust fisheries, and coastal communities warrant a full PEIS that clearly identifies the costs and benefits of these projects, including their negative impacts

3. No cumulative impact analysis, period – this is illogical. Cumulative impacts must analyze OSW at a regional, not piecemeal, scale, especially considering the offshore energy development currently under way in California. There are also efforts north in Washington to site wind farms.

4. No upfront consideration of transmission lines to shore and what the impacts of the transmission lines are, including prohibitions to existing users, and possible safety concerns for ocean users.

5. No transparency: we provide information to BOEM, but there is no transparency as to what is done with that information and who makes the decisions on what level of impact on humans, marine species and the environment is acceptable as a tradeoff for offshore wind energy development? There are no metrics or thresholds the public or lawmakers can see to determine a) whether those thresholds/metrics make sense; b) whether better metrics exist; or c) most importantly, whether BOEM/DOI followed those metrics.

6. No clear answer from BOEM on whether the proposed call areas could be amended based on feedback from Task Force members or the Pacific Council after they have time to engage with the stakeholders.

7. The Oregon Task Force has been meeting for 1.5 years and were given the call areas within 24 hours of the February 25th meeting with little to no time to engage with stakeholders.

8. BOEM process does not allow for the public to understand any detailed plans from developers regarding whether there will be access to wind farm waters for fishing and/or recreating or whether there will be prohibitions and buffer zones.

Fishing Industry and Coastal Community Concerns:

9. Incomplete revenue and effort information on existing commercial and recreational fisheries – its critical to understand the actual impacts on real people and communities, this requires exhausting all sources of information including community multipliers for the recreational sector, which does not generate traditional revenue akin to ex-vessel revenue earned in commercial fisheries.

10. Fisheries are dynamic, not static. The information collected is incomplete and often, not reflective of current fishing patterns and operations, nor does it consider the changes that will occur due to a changing climate and ocean conditions.

11. Fishing strategies are complex – the whiting fishery is conducted over a wide swath of Oregon waters following a highly migratory species and avoiding incidental catch of protected species (e.g.,

ESA-listed salmonids). Other fishery sectors have limited space to operate because of rockfish conservation areas, essential fish habitat, marine reserves, and voluntary closure areas. Fishing is dynamic, not static, and it cannot be captured in a snapshot

12. If fisheries are displaced from productive areas because of offshore development, then we are constrained to fish in concentrated, often less productive areas where higher incidences of incidental catch may occur. Gear conflicts increase, fishing costs increase, productivity decreases. The sum of these displacement effects is less safety for fishermen, higher costs to consumers, and socio-economic harm to coastal communities.

13. Biological stock assessments that fishing regulations are based on are informed by federal and state research survey time series that could be truncated because the research cannot occur in an OSW array. Loss of valuable fisheries science increases scientific uncertainty and often leads to lower allowable harvest levels, adding more harm to fisheries and fishery-dependent coastal communities. NFMS reports that at least 10% of the whiting acoustics survey will be impacted by the current call areas. The survey will already be impacted by the California lease areas.

14. While harvesters are mobile, seafood processors are not. Once shoreside infrastructure is affected and lost, it is nearly impossible to get back. Furthermore, trucking fish from one location to a processor that once had fish delivered directly by vessels will increase that processor's cost.

15. Current port infrastructure is likely insufficient to support construction and deployment of turbines. There are only 3 deep draft ports on Oregon coast and even then, there are several logistical challenges. How will use or change of port infrastructure affect current port users? Lack of infrastructure will likely result in job creation in areas other than coastal communities adjacent to wind farm locations.

16. It is not clear that floating offshore wind turbines and structures can withstand the elements on the West Coast – the Pacific is much different than the North Atlantic, where floating platforms are currently operating.

17. The fishing industry faces several restrictions due to ESA-listed or threatened species – whales, birds, etc. The west coast has the highest concentration of protected marine species in the U.S. It is obvious that these structures will impact marine species, but OSW is not held to the same standard as fisheries; for example – if the fixed gear fleet takes (kills) two short-tailed albatrosses over a two-year period, NMFS could the fishery and ESA re-consultation is triggered. Critical habitat for humpback whales and southern resident orcas continues to expand. Wind farms seem to get a pass when it comes to understanding, avoiding, and mitigating protected species impacts.

18. Coastal Oregon community economies are rural and highly dependent on commercial and recreational fishing and businesses that support those industries. Negative impacts to local economies are felt more significantly than in urban areas due to a variety of factors including the increased cost of living and changing demographics.

What we want to see

• Slow down the process off Oregon.

• Require more complete data on our fisheries and habitat.

• Require a Programmatic EIS that includes cumulative impacts prior to any lease issuance.

• Transparency on decision-making within the BOEM process, including the tolerance level for negative impacts to people and marine life – what is the threshold where the impacts are too detrimental?

• Meaningful engagement and an authentic seat at the table – demand BOEM comply with the Federal Advisory Committee Act and allow the seafood industry to participate in a constructive way, like federal fisheries and the regional council process mandated by the MSA.

• When BOEM announces how many jobs will be created, the agency also acknowledge how many current fishing/processing jobs will be lost due to offshore wind.

• Legislation to mandate many of the elements detailed above.

Author:
Heather Mann, Executive Director
Midwater Trawlers Cooperative