



June 28, 2022

Dr. Whitney Hauer
BOEM Office of Strategic Resources
760 Paseo Camarillo (Suite 102)
Camarillo, CA 93010

Re: BOEM-2022-0009 - Call for Information and Nominations – Offshore Oregon

Dear Dr. Hauer:

Thank you for considering our comments regarding the Call for Information and Nominations - Commercial Leasing for Wind Energy Development on the Outer Continental Shelf (OCS) Offshore Oregon. Specifically, the two Offshore Wind (OSW) Call Areas off the coast of Oregon; the Coos Bay Call Area and the Brookings Call Area.

West Coast Pelagic Conservation Group (WCP) has fishermen representatives as well as processors. Our members fish Coastal Pelagic Species, salmon, albacore, and squid from California to Alaska. Our processors market seafood from all major fisheries. Greg Shaughnessy, VP of WCP and COO of Ocean Gold Seafoods, and I collectively have over one hundred years of fishing and processing experience. I have been working on Offshore Wind for the past three and a half years. I am a member of the Pacific Fishery Management Council's (Council) Marine Planning Committee (MPC) as well as Co-Chair on the Coastal Pelagic Species Advisory Subpanel (CPSAS) and the Groundfish Advisory Subpanel. (GAP). To quote Mr. Phil Anderson, long time Council Member, we believe that OSW is the largest threat to the U.S. Fishing Industry we have encountered.

WCP incorporates by reference our support for the comments submitted by the Pacific Fishery Management Council, Midwater Trawlers Coop, Ocean Gold Seafoods, Southern Oregon Ocean Resource Coalition, West Coast Seafood Processors Association, the Oregon Trawl Commission, the Port of Astoria, the Oregon Coastal Caucus, Coos County, the City of Warrenton, and Englund Marine Supply.

Additionally, WCP incorporates by reference and quotes from a letter sent to BOEM by Oregon Senator Wyden and Congressman DeFazio¹:

*“The California Current, in the Pacific coastal waters, is a unique and exceptional ecosystem that provides immeasurable environmental and economic benefits to the region. **It is critical to conduct a Programmatic EIS before continuing the current leasing process** to evaluate the cumulative impact of all siting, design, and operation of energy projects on this rich and rare natural resource. **It is short-sighted at best and negligent at worst to develop floating offshore wind projects along the Pacific coast piecemeal without studying and planning for the system as a whole. A thorough Programmatic EIS for floating offshore wind facilities off the entire Pacific coast is necessary** to provide clarity on unanswered questions on this nascent technology, make informed choices about the best course of action (including considering a no action scenario)”.....*

We also offer support for and quote² from a prominent member of industry, Mr. Larry Thevik. Larry is the Director of the Washington Dungeness Crab Fishermen’s Association.

. (Comments to BOEM on the Oregon Call areas;) *“The Pacific Fishery Management Council (PFMC) speaking on behalf of all fisheries on the West Coast, whether Council or state managed, wisely stated in a letter to BOEM dated September 13, 2021: "that the direct and indirect effects of wind energy areas on fisheries, habitats, and ecological resources should inform all wind energy scoping process and must do so in advance of leasing, permitting and construction phases of wind energy development".*

And: *“The lack of pre-lease analysis of potential cumulative unintended negative impacts above all else should signal to BOEM the need to provide a programmatic EIS prior to leasing public ocean space to private developers and to heed the repeated call from numerous and diverse sources to SLOW THIS PROCESS DOWN! Slow down until data and analysis catches up to decisions. BOEM has paid little attention to PFMC input or any other stakeholder and ocean advocate input to proceed with a precautionary principle to potential marine resource impacts and economic impacts from vast areas of ocean displacement and industrialization”*

WCP highlights and references these comments as we are deeply troubled by how we arrived at this impasse with BOEM, as are the many Northwest fishing organizations we are aligned with.

There are two overarching issues that have created the rift between BOEM and the West Coast Fishing Industry:

¹ [letter to BOEM Director Amanda Lefton](#)

² Re: BOEM-2022-0009 - Call for Information and Nominations – Offshore Oregon
[Regulations.gov](#)

- 1. The first** is the looming loss of prime fishing grounds to an unproven and expensive technology. This is especially egregious when BOEM will not give direct answers to questions or meaningful method to addressing our concerns, only an ocean of platitudes.
- 2. The second** is our concern over the potential for catastrophic loss of prime ecosystem functions due to physical and obstructive presence of the turbines and the effects of downwind energy deficits downwind of the turbines such as wind wakes which can extend up to 200 kilometers. This could affect all trophic levels from the smallest plankton to the largest blue whale. Opinions are varied as to outcomes, but potential alterations might occur to upwelling, ocean stratification, currents, larval “transport” systems, temperature, salinity, food webs, and access to spawning areas.

If we want an example of what might occur to the California Current Ecosystems (CCE), you need only look at the Columbia River and Salmon runs. Fish ladders were constructed, and the salmon cycle was supposed to continue unabated. Only it didn't. On the surface the dynamics for the Columbia River appear much different, but the changes to the Columbia include loss of spawning grounds, changes in the food web, reduction of currents, loss of “transport” mechanisms, increases to water temperatures, and the physical obstruction created by the dams to the adult salmon returning to spawn, and for the juvenile salmon's outbound trip to the ocean.

The CCE is one of the most productive ecosystems on the planet. We have heard of a term labeled “dynamic habitat.” These are components not affixed to the bottom, in some respects more important to ecosystem productivity than a coral bed or rocky area. The CCE hydrology produces the raw elements that sustain life. Could OSW meteorological alterations at some scale of industrialization harm the CCE and dramatically reduce productivity?

WCP postulates (as have many in the fishing and NGO communities) that multiple years of intense research and analysis could mitigate risk. **As stated in Senator Wyden's and Congressman DeFazio's letter this research and analysis should be a requirement.** As quoted in our March 2022 CPSAS report, studies show that sardines spawn 60+ miles offshore³ and the ocean current and wind transfer the larvae inshore to nursery zones. Crab megalopas can be found far out at sea and may ride the currents some distance south before they make it to an

³ *Transport patterns of eggs and larvae have large effects on subsequent recruitment of pelagic fishes because eggs must be released into appropriate habitat and then retained or drift toward appropriate nursery habitat to survive. (Bakun), 1996*³

estuary. Would a potentially weakened “transport” system diminish the recruitment level of this forage or future crab population?

Loss of fishing grounds due to exclusivity of use in or near the wind farms: This seems simple. You lose an area, and you move your boat elsewhere. But the areas where the wind blows hardest are often the most productive. This is related to wind energy and its relation to ecosystem function. In addition, there is already a great amount of the ocean that is off limits to fishing. The chain of events is complex and difficult to follow but it basically follows several paths.

1. It forces multiple vessels into more confined spaces. This can decrease distribution of harvest species into these areas.
2. It reduces catch per unit effort (CPUE) This in turn drives up cost per unit weight of fish caught. It further reduces the U.S. fishermen’s prospects to be competitive with foreign imported seafood.
3. It distances vessels from their home port and their processor. This in turn exacerbates costs.
4. It constrains fishermen to areas where there are higher levels of bycatch.
5. It will force processors and fishermen to reevaluate the viability of their operations. Each business entity has a requirement for a certain level of production depending among other factors on debt load. Thus, a business with a higher debt load or not sufficiently efficient will need to close their doors at less of a loss of production than a company that owns their assets without a mortgage or that has achieved a high degree of efficiency. Reductions in production arguably harm employee retention equally.

These business suppositions need to be analyzed and reviewed at a professional economic level not only due to a requirement for credibility but to be fully understood as to the economic effect on fishing communities.

We state unequivocally and assuredly that BOEM and Wind Farm developers do not need to wait for a wind project Construction and Operation Plan (COP) to be manufactured in order to analyze and understand the loss of employment, business impacts, and economic hardships that would strike our communities. The developers should welcome this information as it reduces their liability. In point of fact, the BOEM version of NEPA denies our coastal communities the information their residents need to plan and actualize their responses to weakened or lost fisheries.

It is impossible to plan whether to stay in a community, raise a family, or pursue a new career without comprehensive knowledge of how many wind farms will be constructed and how much fishing will be curtailed. This is part of the reason the fishing industry and many in the NGO community are demanding an up-front programmatic EIS prior to leasing that outlines and models cumulative impacts. This does not negate the need for

singular project EIS's prior to construction of a wind farm. We believe the only reason that BOEM refuses to do this is because it will bring the truth to the table. This is NOT transparency. Nor is it fair, to withhold this information from coastal residents and others invested in our communities. However, as long as BOEM refuses to divulge the total number of prospective windfarms the public will never know the level of cumulative impact that will occur.

This is what we were told by BOEM:

"Data Gathering and Engagement Plan for Offshore Wind Energy in Oregon October 2020":⁴

Excerpts:

- *Promote public input opportunities for the Oregon offshore wind planning efforts through email, BOEM and other agency websites or mail services, **and partnerships with stakeholder groups.***
- *Understand opportunities and challenges of offshore wind through outreach to interested and affected parties to inform future leasing and development decisions;*
- *Provide a publicly available final report summarizing the data and information collected...*
- *Ensure early coordination and communication to design an engagement process that is inclusive, well-considered, and transparent;*
- *Conduct outreach in a way that reflects local interests and preferences and allows for early information-sharing and feedback*

Based on previous work with ocean users, in-person engagement is best when it occurs where the group is located or through standing meetings with existing organizations or councils, in order to develop relationships and share information about the offshore wind planning

Due to the intensity of fishing seasons, scheduling in-person meetings with fishing communities should aim to accommodate prime fishing periods. Fishing sectors in Oregon occur in overlapping seasons, and availability of fishing industry participants differs by community. BOEM and the State will strive to schedule meetings outside of fishing seasons important to the majority of each community to maximize opportunities for participation in meetings. Meeting directly with fishermen will be a key activity for this engagement effort and will also include one-on-one calls to inform the approach and identify opportunities to participate in standing meetings

In May of 2021 BOEM convinced the Oregon Trawl Commission to have a joint meeting. This was well attended by Trawl representatives. Members were alarmed to hear the BOEM

⁴ [BOEM-OR-OSW-Engagement-Plan.pdf](#)

presentation. Tempers were heated. Several weeks after that meeting I discussed use of a more productive approach with BOEM staff using a 2-step process:

1. **Step one** would have been to meet with prominent fishing organizations or directors and members who represented specific fishing sectors. A primary goal of this was to educate BOEM on that, which appears to be one industry, is in fact, multiple industries and markets premised on the species of harvest. .
2. **Step two** would have been town hall style meetings or short workshops in various fishing communities up and down the coast where BOEM could do more thorough engagement based on open dialogue. The principle in both styles was to build a platform for dialog (and hopefully trust), not just recording three-minute comments which were largely complaints about the BOEM public process.

The original idea was to accomplish these meetings prior to formation of the Oregon Call Areas, preferably in July or August of 2021 This would have given opportunity to learn which areas would be impactful to fishing activity. BOEM wished to do the meeting after the Call areas were announced. As it turned out the meeting were then further delayed due to the fishing seasons and other scheduled meetings. I do not blame the BOEM staff person but rather the BOEM process. The “comment” system BOEM employs using public comments does not support the BOEM engagement principles and has created a wedge and distrust between the fishing industry and the agency.

As a sidebar of note I recently participated in a small Oregon community meeting with a wind development group. After several hours of general discussion and Q & A the developer asked us to look at the ORO Wind Maps. We explained that we could go through the maps but that we were missing representation from three important fishing sectors and absolutely could not represent their interests. We gave the group the names of primary contacts for those sectors and told them we expected them to contact those representatives if the developer wanted to remain a credible commodity.

We then noticed that some of the posted mapping data was prior to 2017. We pointed out this was no longer accurate due to the regulatory changes that expanded the RCA. Fishermen in attendance then verbally delineated, with **fisherman knowledge only**, the areas they now fished and primary spawning areas for groundfish. Basically, the entirety of the two call areas is being utilized for fishing, spawning areas, or cables.

Where this goes from here is anyone’s guess, but we did learn something. When a group that wishes to meet with fishermen is willing to do so on the fishermen’s terms and turf and is willing to accept fishermen knowledge as qualitative data, it makes a difference as to outcome. Fishermen did not have to argue with presenters over Maps that had a large variety of temporal parameters and that were not always clear on which fisheries you were looking at.

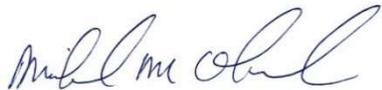
As virtually all the space on the chart was occupied by some form of activity related to fishing it is difficult to know where this may lead. However, the dialog process coupled with a fast chart master delivered a quick picture of current fishing activity in the Call areas.

Notably several years after being given a mandate by BOEM to learn their mapping system and comply with their requirement to look at multiple data sets and render an opinion we were no closer to exchanging information in an organized fashion. In that process we learned that BOEM procedure does not yield veracity of data or meaningful results: **Only leases.**

We note that we practiced outreach. We did our best to engage. The BOEM staff were respectful, behaved professionally, and were personable. But the BOEM process only does one action well: **Leasing.**

Fishermen and Processors are not stakeholders and we deeply resent that categorization. **We are investors in our nation's sustainable and renewable ocean resources and providers for our nation's food security. Our credibility and reputations are secure even if our livelihoods are not.**

Thank you
Sincerely,



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