



West Coast Seafood Processors Association
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June 28, 2022

Mr. Doug Boren
Bureau of Ocean Energy Management
Office of Strategic Resources
760 Paseo Camarillo; Suite 102
Camarillo, California 93010

Submitted online to Docket No. BOEM-2021-0009 via <http://regulations.gov>

RE: Oregon Call Areas: Call for Information and Request for Comments

Dear Mr. Boren:

The West Coast Seafood Processors Association (WCSPA) submits the following comments as part of the Bureau of Ocean Energy Management's (BOEM's) **Request for Information and Nominations: Commercial Leasing for Wind Energy Development on the Outer Continental Shelf (OCS) Offshore Oregon**. This Call for Information and Nominations (Call) invites public comment on and assesses interest in possible commercial wind energy leasing on the OCS offshore the Oregon coast.

WCSPA represents shoreside seafood processors in California, Oregon, and Washington whose fishermen participate in about every West Coast fishery and target a variety of species including Dungeness crab, groundfish (including rockfish, sole, sablefish or "black cod," and Pacific hake or "whiting"), Pacific pink shrimp, salmon, and albacore tuna, among others. Our member companies range from small "mom-and-pop" processors to the largest, vertically-integrated processors on the West Coast. We employ thousands of people in Oregon's seafood industry. WCSPA member companies could be severely affected by establishing wind farms in the Coos Bay and Brookings Call Areas identified in this Call. BOEM has selected some of the most important fishing grounds off Oregon's coast for offshore wind development; WCSPA processors in all three West Coast states depend heavily on fish and shellfish harvested in or near these Call Areas. We strongly oppose the development of the Coos Bay and Brookings Call Areas for offshore wind.

The Nature of Seafood Processing and Offshore Wind's Potential Effects

Shoreside seafood processors consist of dockside structures, fixed in place, which cannot move. Our member companies provide family-wage jobs, employing thousands of workers that live in coastal communities. In some areas, fishing and processing account for up to 30 percent of the local employment. Fish or shellfish harvested from the Call Areas account for up to 60 percent of the seafood processed by our members on Oregon's South Coast. These companies anchor their respective communities. Beyond providing year-round employment, they provide essential services to fishermen such as gear stores, bait storage, loading/offloading services, ice and more. The historical contributions of these companies and the seafood industry as whole to our communities are immeasurable.

Any socio-economic analysis conducted during the offshore wind development process should detail seafood processing's contributions to the communities and demonstrate the potential tradeoffs of losing processing infrastructure and employment vs. *potential* offshore wind jobs. So far, BOEM's accounting of offshore wind job production does not include the potential job losses to the fishing and seafood industries. BOEM, in fact, has not yet considered the impacts of offshore wind development on seafood processors and fishing-related infrastructure at all. The Oregon Employment Department's (OED) April 2022 [seafood industry report](#) shows that, "The processing industry paid more than \$49 million in wages in 2020, which clearly shows the benefit of adding value to raw natural products¹." The impacts to our sector must be identified and accounted for by BOEM before moving forward with any offshore wind development projects off Oregon's coast.

Fishermen and seafood processors are essential workers. Our industry provides healthy, nutritious, sustainable protein that produces ***the lowest carbon footprint relative to other protein sources***. As lead author Dr. Ray Hilborn notes in a recent [study](#), "The environmental cost of animal source foods²," that:

"... the lowest impact forms of animal protein come from species that feed naturally in the ocean and that can be harvested with low fuel requirements."

Clearly, fishermen and the seafood industry already play an important role in addressing the climate crisis. It would be extremely short-sighted and irresponsible for BOEM to develop some of Oregon's most important fishing grounds for offshore wind without considering the loss of this important, sustainable protein source, especially as the world's population continues to increase at a rapid and alarming rate. BOEM must therefore also account for the seafood industry's contribution to the global environmental crisis.

Losing domestic seafood harvesting and processing will create greater food insecurity. The U.S. already depends on imports to enhance our seafood demand. That demand will increase, and our country will be operating at a seafood deficit, especially when combined with the loss of fisheries and seafood from the East Coast and Gulf Coast due to offshore wind.

Spatial displacement of fisheries and the economic value they provide to coastal ports and communities is not easy to quantify, but a range of potential economic losses should be considered in order to minimize them. The PFM's [Ecosystem Working Group noted in its Agenda Item C.2.a Supplemental Report 1](#) that:

"... simply quantifying where fishing effort is occurring today or has occurred in recent years may underestimate the socioeconomic effects of any closures due to: 1) eroding the portfolio of fishing location choices, and 2) potential additional effects of moving and concentrating fishing effort outside closed areas."

Therefore, the displacement of fishermen and potential loss of processors due to lower seafood landings cannot be dismissed so easily in favor of offshore wind energy.

¹ The Oregon Employment Department's processing figures are for 2020; at the time of the [report](#), April 2022, complete annual figures for 2021 were unavailable.

² Hilborn, R., Banobi, J., Hall, S.J., Pucylowski, T., & Walsworth, T.E. "The environmental cost of animal source foods." June 12, 2028, *Frontiers in Ecology and the Environment*. <https://doi.org/10.1002/fee.1822>

BOEM's highest priority should be ensuring that existing entities – fishermen, seafood processors, fishing communities – will not be irreparably harmed due to offshore wind development. Trading the promise of offshore wind jobs for the presence of existing jobs is unjustified. After all, offshore wind construction and maintenance would, in part, be built on the years of port improvements brought about by the very industry that would be lost.

The Influence of Certain Species or Fishing Categories

WCSPA acknowledges the Call Areas are, for the most part, outside of the most productive pink shrimp and Dungeness crab grounds, as noted in the Call. However, the groundfish fishery, which includes more than 80 species of rockfish, flatfish and roundfish, is critical to keep our processing businesses operating year-round. Sablefish and whiting are two of the most valuable species within the groundfish category; the singular value of other species, frequently noted by BOEM in their public presentations, misrepresent the influence of this greater groundfish category. The fishing behaviors used to harvest groundfish and the regulations developed for groundfish harvesting sectors of the fleets (e.g., fixed gear sablefish, bottom trawl, midwater trawl, etc.) should be considered instead of using a single-species approach for any socio-economic analyses.

For example, [BOEM notes in the Call](#) that Dungeness crab and pink shrimp are the highest-value invertebrate species in Oregon:

“Economic productivity of Oregon’s invertebrate fisheries reflects biological productivity and is higher on the continental shelf when compared to the continental slope. Substantial portions of the fishing grounds for Dungeness crab and pink shrimp, the two highest-value fisheries landed in Oregon ports, are avoided by the 13.8-mile exclusion buffer from shore.”

However, the Call says little to nothing about groundfish (excluding Pacific hake, “whiting”) that, when taken in total, contributed \$22.5 million to Oregon in 2021, a 22 percent increase according to the April 2022 [Oregon Employment Department](#) report:

“The value of groundfish landed increased 22% in 2021 to \$22.5 million. The landed value had dropped for the last few years so 2021 represented a small recovery, but the fishery is still below its average since 2010. The amount landed increased by 10%, and the average price rose five cents per pound to fifty cents.”

The OED information was based on preliminary data and excluded whiting, which is one of the major contributors to the groundfish category. The Pacific States Marine Fisheries Commission’s (PSMFC) [Pacific Fishery Information Network \(PacFIN\) database](#) shows the value of total groundfish landings, including whiting, based on fish ticket data, at \$40 million for 2021. By comparison, pink shrimp was \$23.4 million.

Oregon’s groundfish fishery has endured dramatic changes over the last 20 years, and its resiliency is being tested as regulations and ocean conditions change. Fishermen have sacrificed time on the water and income to rebuild nine species of groundfish in the last two decades. We’ve endured vessel and permit buyouts, no-fishing areas to protect rockfish species and a drastic shift to individual quota fishing in 2011 that has further reduced our annual groundfish landings. Therefore, while we appreciate the 13.8-mile exclusion zone, by no means does it account for other, equally or more valuable species that are caught on the slope.

The Importance of Upwelling and the California Current

Oregon's fisheries would not be as productive and conducive to coastal communities' successes were it not for the incredible, complex California Current Large Marine Ecosystem (CCLME) that runs along the West Coast.

At minimum, BOEM should provide greater consideration and study of the California Current processes and how offshore wind would affect the ocean ecology. The seafood industry provides plentiful, sustainable, nutritious protein to the world. Structural changes in the form of anchors and floating turbines in the ocean that could affect the natural cycle of one of the most productive currents in the world should be considered as part of the process to ensure fisheries and seafood processing remain viable.

Coastal counties, ports and communities recognize the importance of protecting this natural resource, as evidenced by resolutions approved at public meetings and other letters included in this docket. As many coastal stakeholders noted in recent meetings, offshore wind is the biggest threat to our fisheries and, potentially, our ocean ecosystem.

For example:

- The [Port of Brookings Harbor](#) detailed the importance of sport and commercial fishing to the Curry County economy, as Curry County experiences high unemployment rates (incorporated here as an attachment);
- The [commissioners in Clatsop County](#), in northern Oregon, explain how Call Areas in the southern part of the state could affect their community. Further, they discuss how a seafood industry dollar turns over many times in coastal communities because of the marine-related businesses and employment related to sport and commercial fishing;
- The [Coos County Commission](#) agrees with many other commenters that more detailed analyses need to be completed at the start of the BOEM process, not at the end;
- The [Port of Newport's](#) letter and resolution include seven suggestions to make the process more transparent and open to stakeholders. They also make the point that without a comprehensive economic analysis, it is difficult to determine the true extent of offshore wind on coastal communities that depend on the fishing and seafood industry for coastal employment.

The above are just a few examples of the many commenters recommending many of the same things: Slow down, truly consider the stakeholders and seafood industry, do the studies necessary to prove offshore wind will not trade off seafood industry jobs for wind jobs and that offshore wind will not disrupt or productive ocean ecosystem.

While [BOEM's tips for successful comments](#) says less helpful comments repeat those of other commenters, WCSPA strongly disagrees. Instead, BOEM should pay *more* attention to those comments, especially when a suite of State and Federal lawmakers, municipalities, ports, counties, community leaders, and individuals identify the same problems with the BOEM process and ask for greater transparency, re-issuing the call for depths greater than 1300m and doing the required environmental studies at the beginning of the process.

Specific Recommendations

With the idea of retaining healthy California Current ecosystem processes, productive seafood harvesting, and viable seafood processing, **WCSPA recommends the following:**

1. Pause the Leasing Process and Commit to Doing a Full Programmatic Environmental Impact Statement (PEIS)

BOEM may be following the National Environmental Policy Act (NEPA) process to its advantage – that is, a no action alternative is not really viable once leases are made – but that is extremely short-sighted (the BOEM process is the same in other regions). The [Conservation Law Foundation](#), speaking to the Gulf of Maine offshore wind process, noted that doing a full environmental impact statement *before* choosing areas is critical. We completely agree. At this stage, doing a full, programmatic EIS, which includes cumulative impacts from other proposed offshore wind projects or potential areas on the West Coast, is imperative.

Furthermore, a full PEIS analysis will provide valuable information to potential developers looking to establish wind farms off the West Coast, showing where sensitive ecological places exist, which areas are most used by specific fisheries, etc. Again, several Oregon ports, counties and cities, along with multiple commenters, support doing a PEIS early in the process, certainly before leases.

In a [letter](#) to BOEM Director Amanda Lefton, Rep. Peter DeFazio and Sen. Ron Wyden said: “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 [California Current ecosystem] ... as a whole.” We urge BOEM to do the studies, do the analysis, do a PEIS before moving ahead.

2. Rescind the Current Call Areas and Issue Another Call that Includes Areas Outside of 1300m

As other commenters have stated, developers have said it is possible to establish offshore wind turbines at depths greater than 1300m. Moving the offshore wind areas deeper would eliminate conflicts with most of the sport and commercial fisheries in Oregon. The Call, in Section 3(b)(iii), states:

“Outreach and data gathering efforts conducted by BOEM and the State focused on areas with water depths up to 1,300 meters as a reasonable limit for near-term development of floating offshore wind energy facilities, based on the current technoeconomic feasibility as suggested by [the National Renewable Energy Laboratory] in offshore wind cost modeling studies on the West Coast On the westward boundary, partial OCS blocks within the Call Areas include 1,300 meter water depths. Future planning may consider additional areas in water depths greater than 1,300 meters.”

WCSPA argues that BOEM established this 1300m boundary during early discussion with the state of Oregon and the Intergovernmental Renewable Energy Task Force before adequate fisheries data was included in the [OROWindMap](#) database. That information was insufficient to inform the technoeconomic feasibility for offshore wind developers and potential tradeoffs with other ocean users. This arbitrary cut-off boundary unfavorably tips the scales in favor of offshore wind developers’ technoeconomic feasibility without considering the seafood industry’s displacement.

Furthermore, offshore wind technology is changing quickly and greater turbine size, placed at a greater depth, would create economies of scale. While BOEM requests comments on planning for future areas in depths greater than 1300m, it is reasonable to conclude that developers would be hesitant to provide comments regarding those depths. The current BOEM process affords the ease of displacing fisheries for wind farm construction at lower cost to offshore wind developers but at greater costs to the seafood industry.

3. Fully Coordinate with Other Federal, State, and Tribal Agencies/Entities

BOEM stated it has worked in conjunction with other Federal, State and Tribal Agencies/Entities, particularly on the Oregon Task Force. However, it has become clear that NOAA Fisheries and the U.S. Coast Guard are merely advisors to BOEM. This becomes clear through BOEM's misunderstanding/mischaracterization of fisheries and the greater Pacific Ocean environment. BOEM should recognize its own deficiencies related to fisheries and maritime navigation and defer some of those decisions or consultations to include more fully the Federal, State and Tribal Agencies/Entities that understand fisheries, the ocean environment, and marine navigation best. Doing otherwise puts our fisheries, oceans and ocean uses at risk.

Again, we refer to the Rep. DeFazio-Sen. Wyden letter, which says: "... BOEM should fully coordinate with federal partners including NOAA, the [Pacific Fishery Management Council], and the United States Coast Guard to make sure the most relevant expertise is included in each step of the decision-making process."

4. Conduct Additional Studies on Habitats

The Call Notice, at 3(f)(iv), marine habitats, indicates that mud habitats become more prevalent as the depth increases. Ideally, this would be the best area for placement of anchors for floating turbines. However, more modelling and analysis should be completed *prior* to development of WEAs or leasing on how new structure, specifically, how cables and the floating turbines will affect that muddy marine seafloor. Cables are likely to be large enough to create structure where none existed before and will become fouled with marine invertebrates. How will this change the predator-prey complexes at those depths?

Additionally, BOEM and developers have pointed to floating offshore turbines as fish-aggregating devices that could inherently *help* fisheries. On the surface, that seems plausible but more modeling of inter-species changes in the ocean environment needs to be considered first.

5. Issue a *Proposed* WEA, Similar to the Process for the Proposed Call Areas

BOEM successfully proposed three potential Call Areas ahead of the [Feb. 25, 2022, Task Force meeting](#) and prior to the official [April 29, 2022, Federal Register publication notice](#). BOEM dropped the Bandon Call Area during that intervening time. Therefore, it seems reasonable for BOEM to issue *proposed* WEAs based on information obtained in response to this Call, then further refine the WEAs based on more outreach and engagement.

In addition to gathering more pertinent information, it would give BOEM more time for outreach and engender more trust with ocean stakeholders. Furthermore, potential developers would have additional time to work with BOEM and ocean users as well.

6. Eliminate Survey Stations from Any WEAs

Successful, sustainable fisheries depend on successful fisheries management by the Pacific Fishery Management Council (PFMC) and National Marine Fisheries Service (NOAA Fisheries). Historical time series of fisheries-independent groundfish surveys, conducted along established transects and stations from Washington to California, provide the framework for stock assessments on which fisheries management is based. Interruptions to those historical surveys due to offshore wind energy will introduce uncertainty into stock assessments and, in response to that uncertainty, fishery managers will have to limit harvests.

Additionally, several NOAA Fisheries and/or state surveys relating to fisheries, birds, marine mammals or other protected species affect international and Tribal fisheries agreements. Those countries or tribes share resources or are managed jointly with the U.S. These surveys are integral to the sustainable management of our West Coast fisheries shared by fishermen and industries beyond U.S. borders.

Lastly, independent researchers point to the importance of surveys as ocean conditions and ocean uses change:

“A robust and collaborative network of regional monitoring programs can detect early signs of unanticipated changes, provide a more holistic understanding of ecosystem responses, and prompt faster management actions. Fisheries-related surveys that collect fisheries-independent data ... are a key pillar of sustainable fisheries management and are ubiquitous in the United States and other countries. From the perspective of ocean observing, fisheries surveys offer three key strengths: (1) they are sustained due to largely consistent funding support from federal and state public sector fisheries agencies, (2) they collect paired physical, chemical, and biological data, and (3) they have large and frequently overlapping spatial footprints that extend into the offshore region³. ...

““The [California Current Ecosystem] is undergoing a period of rapid change due to both climate change and increasing interests in ocean use (e.g., offshore wind power generation and aquaculture). These ocean interests have the potential to interact with ongoing ocean monitoring efforts, making it particularly important to document the temporal and spatial extent of monitoring.”

Given these examples and the need to maintain datasets for dependable fisheries management, WCSPA suggests areas identified for potential offshore wind development exclude areas that hold historical survey transects or stations. This would enable NOAA Fisheries to adhere to its fisheries management obligations with respect to other nations or Tribes while also decreasing management uncertainty for the domestic seafood industry.

³ Gallo, N.D.; Bowlin, N.M.; Thompson, A.R.; Satterthwaite, E.V.; Brady, B; & Semmens, B.X, “Fisheries Surveys Are Essential Ocean Observing Programs in a Time of Global Change: A Synthesis of Oceanographic and Ecological Data From U.S. West Coast Fisheries Surveys.” March 2, 2022, *Frontiers in Marine Science*.
<https://www.frontiersin.org/articles/10.3389/fmars.2022.757124/full>

7. Establish Transit Lanes and Retain Existing Towboat-Crabber Tow Lanes

WCSPA supports establishing transit lanes through large WEAs, especially those extending for miles north and south directly in front of ports. The transit lanes would afford safer navigation to and from the ports for those vessels accessing deeper water fishing areas. Small fishing vessels, especially, would need access to lanes sufficiently wide enough to account for changes in weather patterns.

Similarly, transit or fishing lanes between WEAs or wind farms could possibly allow for consistent fisheries-independent survey access to maintain the quality of NOAA Fisheries surveys (see above). It is imperative these surveys retain consistent stations and transects; at minimum, BOEM should work directly with NOAA Fisheries to ensure transit and fishing lanes exist to retain the integrity of fisheries surveys.

WCSPA also supports creating north/south towboat/crabber towlanes. [Washington Sea Grant, in its comments](#) in this docket, notes how the Coos Bay Call Area abruptly stops the outer towboat lanes (year-round lanes) used primarily by towboats during the winter, when crabbers are fishing inshore of that area during Dungeness crab season. Eliminating this towlane will force towboats shoreward of the call area and into popular Dungeness crab grounds, exacerbating conflicts between crab gear and marine shippers. Including a north/south outer towlane of sufficient size to maintain shipping and towboat safety during winter storms will continue to reduce conflicts with the crab fleet, reduce safety hazards and save millions of dollars to towboat operators and crabbers in lost gear and vessel repairs.

At minimum, BOEM should at least account for access lanes from the outer, year-round towlanes to the inner tow lanes closer to shore.

8. Eliminate the Panhandle on the North End of the Brookings Call Area

As we stated earlier, we support rescinding both the Coos Bay and Brookings Call Areas and re-issuing the Call in areas deeper than 1300 meters. However, should BOEM move forward with development of any part of the Brookings Call Area, WCSPA suggests eliminating the northern portion, the “Panhandle,” from further consideration for several reasons:

(Note: This recommendation should not be interpreted as support for the inclusion of the remaining Brookings Call Area)

- A. It overlaps with Rockfish Conservation Areas (RCAs), groundfish essential fish habitat (EFH) and habitat areas of particular concern (see OROWindMap, <https://bit.ly/3Nnteoh>). These areas have been off limits to fishermen for years, and for good reason: They are essential habitats and areas for long-lived rockfish to grow and thrive.
- B. Productive midwater Pacific whiting fisheries (shoreside, mothership, catcher-processor), groundfish bottom trawl, and some fixed gear fisheries frequent this area, especially south, outside of the RCAs (see OROWindMap, <https://bit.ly/3u3s8qT>). As noted above, groundfish, including rockfish and whiting, are essential to seafood processors for year-round operations.
- C. Bathymetric slope in the middle of the panhandle, from southeast to northwest, appears to be greater than 10 degrees (see OROWindMap, <https://bit.ly/3ODdkHg>). Both BOEM and wind developers have noted that slopes greater than 10 degrees are not conducive to anchoring the turbines.

Given these overlaps in uses or complications, it appears that habitat restrictions, fisheries uses and restrictive slopes in the northern part of the Brookings Call Area would make this one candidate area to eliminate from further consideration under any circumstance. We again emphasize that we support rescinding both of the current Oregon Call Areas (see Recommendation #2).

In Conclusion

WCSPA appreciates the opportunity to provide input and suggestions relating to the Oregon Call Areas. However, we do not support further consideration of developing the current Call Areas for offshore wind at all.

The overarching approach to offshore wind siting in waters off Oregon should apply significant precaution. As many members of the seafood industry, lawmakers, coastal communities and conservation organizations have said or provided in written comments, “slow down.” Too many unanswered questions exist about the nature of offshore wind turbines’ effects on fisheries, the seafood industry, marine mammals, seabirds, other protected species, benthic organisms, the very marine environment renewable energy is supposed to protect. To that end, WCSPA proposes the eight recommendations contained in this letter to more accurately and intentionally design WEAs and subsequent lease areas *if* and when the appropriate studies, modeling and analyses are completed.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Lori L. Steele". The signature is written in a cursive, flowing style.

Lori Steele
Executive Director