



Clatsop County

Board of Commissioners

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June 8, 2022

Mr. Douglas Boren
Pacific Regional Director
Bureau of Ocean Energy Management
US Department of the Interior
Pacific OCS Region 760
Paseo Camarillo
Camarillo, CA 93010

Dear Director Boren:

The Clatsop County Board of Commissioners supports the perspective and concerns expressed by the Coastal Caucus of the Oregon State Legislators related to offshore wind energy. Similar to the Coastal Caucus, the Board of Commissioners also confronts issues facing the coast based on geography, community health/welfare, and sustainability rather than partisanship. More specifically, our lens identifies how a particular issue affects our constituents as a whole, their communities, industries, and the economies of our coastal community.

The Coastal Caucus of the Oregon State Legislators has conducted extensive public outreach, including six listening sessions with a broad group of community members including tribal, commercial and recreational fishing, fish/seafood processors, environmental organization representatives, business owners and community members at large. The overwhelming consensus across stakeholder groups were serious concerns and great apprehension of the existing call areas.

During the 2021 Oregon Legislative Session, the Oregon Legislature passed HB 3375. This legislation directed the Oregon Department of Energy to study the benefits and challenges of integrating up to three gigawatts of floating offshore wind energy into Oregon's electric grid. The legislation in part says, "Section 1 (g) Understanding the impacts, benefits, opportunities and barriers of floating offshore wind energy with respect to Oregon's fishing communities, ocean and shore-side recreational users, tribes, ports, coastal ecosystems, natural resources, manufacturing industry, maritime sector, disaster recovery planning, workforce development and electricity ratepayers can maximize the benefits to this state, while minimizing the conflicts between floating offshore wind energy, the ocean ecosystem and ocean users." Additionally, "Section 1 (2) (b) It is further the goal of this state that the planning described in this subsection be conducted in a manner that will maximize benefits to this state while minimizing conflicts between floating offshore wind energy, the ocean ecosystem and ocean users." Through the process of engagement with stakeholders along the coast, the overwhelming consensus was

again serious concerns with the existing call areas regarding impacts to existing and future user groups, negative environment impacts, as well as barriers to the accessibility of our exceptionally sustainable fishing habitat.

The commercial seafood industry alone is an over \$700 million-dollar economic driver to our state and generates approximately 7,000 full-time jobs, most of which are in our districts along our coast. These numbers do not reflect the support industries to these fishermen, such as welders, ship builders, pipe fitters, engineers, hydraulic workers, industry store staff and more. Additionally, the economic multiplier of these fishing dollars is in upwards of 7 times in our coastal communities and around the state. This supports families through living wages across our coastal community's business sectors. Unfortunately, many of our coastal communities have seen generations of poverty and have struggled economically particularly in recent years, and they simply cannot afford another blow that will impact their economies through the loss of fishing grounds and associated jobs.

Along with the fishermen, seafood processing workers, related marine business owners and others who have a stake in fishing that overwhelmingly spoke with great apprehension, environmental groups and individuals echoed serious concerns of the existing call areas as well. These concerns were regarding the call area locations and the incredible ocean ecological resources off Oregon, which is the 4th best in the world. This is caused by two main factors: the California Current and Upwelling. There were serious concerns expressed again, by all stakeholder groups, that the existing call areas could have serious negative impacts on these two main factors that drive the abundance of Oregon's ocean ecosystem.

We recognize that data is critically important and we also have serious concerns regarding the BOEM process in these and other areas. Our coastal commercial and recreational ocean users are subject to some of the strictest science-based regulations in the world. They have strict no kill and other limits on bycatch and whale entanglement, to name a few. Through their industry process, fishermen must deal with several federal and state agencies, including NOAA and the PFMC. These two agencies lead the science-based regulations on our ocean users, yet they are subsidiary and only somewhat advisory to BOEM. This is a serious problem on multiple levels as BOEM consistently disregards concerns from NOAA and the PFMC in their process. BOEM also does not have to work through an EIS until after call and lease areas are identified, which is unlike the process for any other user. Even then, the process is not nearly extensive enough to detail the concerns laid out in the previous paragraph. We call on our Federal Elected Delegation to draft and pass legislation in Congress to regulate BOEM's process in relation to offshore wind so that NOAA and the PFMC have regulatory input in BOEM's siting authority, as they do with other ocean users. We ask that an EIS conform to that of other ocean users, and that BOEM adhere to their existing plain text policy statement governing their process which reads, "The right to navigation and fishing therein shall not be affected."

While wind energy fits in the state's goal of moving toward a more renewable future for Oregon, steps must be taken to ensure that existing ocean users and our coastal communities are prioritized.

As County Commissioners who represent the fishing/seafood industry in our community, it is important to listen closely to the sport and commercial fishermen, processors, related marine

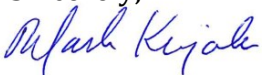
user businesses, our environmental organizations and individuals to make sure that both wind and the seafood industry can thrive, and that our world renowned and uniquely abundant ocean ecosystem is not harmed.

The Clatsop County Board of Commissioners agrees with much of Governor Brown's letter of January 13th, 2022. After extensive stakeholder and community input, we believe for FOSW to move forward off Oregon, the following suggestions would help avoid economic and environmental conflicts so that both industries could work productively:

- Slow down the process to better understand the risks and uncertainties to the ecosystem, economics and coastal communities.
- Locate turbines beyond 1300 meters in depth. In this regard we agree with Governor Brown. The best available data suggests that this would reduce the impact on the California Current and Upwelling. Technology continues to improve for FOSW, and placement at these depths would mitigate related issues by the time turbines are actually manufactured and placed off Oregon.
- Fully review all the concerns about marine habitat, marine bird and mammals and environmental impacts. Fully review the effect of longer transmission lines on energy costs. Fully review any effect on ocean navigation. Fully review commercial fishing outside 1300 meters.
- As Governor Brown also stated in her letter, prioritize the specific location of Call Areas or any Wind Energy Areas identified in the future to achieve the highest gain, but with the least amount of geographic ocean coverage.
- Prioritize the best use of the areas in terms of economic benefit to Oregon and the Oregon Coast. The seafood industry plays a huge part in our coastal communities and is an important economic driver for our entire state. Reduction in the ability of the commercial fishing fleets to access fishing grounds also reduces the public's access to a publicly held resource.

While we recognize the potential benefits of offshore wind development, we are deeply concerned about the impacts to our coastal economy, the marine environment and to the entire state of Oregon. Please consider to the greatest extent possible, the concerns coming from our fishing community and all of those who are stakeholders in one of the best-managed, most sustainable fisheries, and one of the most ecologically abundant and diverse ocean ecosystems in the entire world. We stand ready to weigh in and work constructively on this matter, however, it should not come at the cost of family wage jobs and the commercial seafood industry that is so critical to our Oregon Coastal constituents, their communities and the businesses that support them.

Sincerely,



Mark Kujala

Chair, Clatsop County Board of Commissioners