

APPENDIX A:
Summary of Major
Oregon Draft WEA Comments

**Summary of Public Comments Received on Draft Wind Energy Areas (WEA) –
Commercial Leasing for Wind Power Development on the Oregon Outer Continental Shelf
(OCS)
Docket BOEM-2023-0033**

COMMENTS ON THE BOEM PACIFIC OREGON DRAFT WEA

On Aug. 15, 2023, BOEM announced a 60-day public comment period on two draft Wind Energy Areas (WEAs) located in the Call Areas offshore southern Oregon. The Draft WEAs cover approximately 219,568 acres offshore southern Oregon with their closest points from shore ranging from approximately 18 miles for the Brookings WEA to 32 miles for the Coos Bay WEA. The comment period was open until October 16, 2023, and then extended to October 31, 2023, based on public comment. Comments were collected via www.regulations.gov, by U.S. post, as well as during public meetings.

BOEM received approximately 1,150 comments from Tribes, individuals, Federal and state agencies, advocacy groups and nongovernmental organizations (NGOs), industry and business owners. Each comment was read and categorized according to its source and the nature of the information included. Of the approximately 1,150 comments received, 691 contain unique content, 335 were part of form letter campaigns, 8 were not germane in content, 9 were duplicates and 107 were submitted as Anonymous. All comments were reviewed and comments that were relevant to the modification of size or location of the Draft WEAs were considered in the preparation of the Final WEAs. Below is a summary of substantive comments received by BOEM, please note this is not inclusive of all substantive comments.

COMMENTS ON THE DRAFT WEAs

Affiliated Tribes of Northwest Indians (ATNI) (Letter Emailed to BOEM)

- Urges BOEM to immediately halt scoping and permitting for offshore wind projects until a comprehensive and transparent procedure is developed and implemented to protect Tribal environmental and sovereign interests.
- References the ATNI Resolution 2023-39 (May 2023) and NCAI Resolution (February 2023).
- Requests meaningful and timely consultation with Tribal governments.
- Requests a comprehensive environmental and cultural impact assessment.
- Requests BOEM honor the Memorandum of Uniform for Tribal Consultation.
- Requests improved opportunities for Tribes to effectively partner with BOEM and that BOEM share resources with the Tribes and extend the comment period to longer than 60 days.
- Requests a Programmatic Environmental Impact Statement (PEIS) for all offshore wind activities, and to defer further action on the Draft WEAs until the completion of the National Academy of Science's report on the impacts of offshore wind to fisheries.
- Requests further investigation to expand understanding of impacts to all marine mammal use in the Call Areas and potential impacts to their migrations, feeding, and residential use.
- Requests further investigation of impacts to terrestrial, freshwater, and estuarine species.
- Requests further investigation of impacts of increased shipping traffic.
- Demands BOEM research the economic feasibility of selling the power from these potential wind energy projects and the cost-benefit analysis of infrastructure and maintenance costs and share these findings.
- Requests BOEM implement and include a traditional cultural area exclusion layer in the same manner as the Department of Defense Exclusion Layer.

100 Friends of Port Orford (BOEM-2023-0033-0502)

- Urges a pause in leasing to conduct extensive studies on various impacts:
 - Baseline studies on birds, wildlife, and fish.
 - Examination of wind energy arrays' impact on critical habitat for endangered species like humpback whales, leatherback sea turtles, Leach's storm-petrels, and short-tailed albatross.
 - Assessment of upwelling effects, crucial for marine ecosystem productivity.
 - Evaluation of impacts on coastal communities, including onshore transmission cables, marine services, and power line connections.
- Believes there are better, safer renewable energy alternatives available than offshore wind.

Alderman, J. (BOEM-2023-0033-0667)

- Expresses concern about the potential disruption of marine animals, particularly whales, due to the underwater noise produced by the turbines, highlighting the sensitivity of navigation systems and feeding grounds.
- Raises the issue of ongoing maintenance costs for complex offshore wind turbine structures and expresses worry about the burden this might place on taxpayers or utility consumers.
- Criticizes the idea that coastal and rural residents are asked to sacrifice fishing and farming for the wind industry, emphasizing the need for major consumers in cities to play a more significant role in renewable energy efforts.
- Questions why there isn't a stronger emphasis on installing solar panels on city rooftops and placing wind turbines in city parks as an alternative to impacting coastal and rural areas.
- No port expansions would be required if renewable energy developed in cities.

American Albacore Fishing Assn & Western Fishboat Owners Assn (BOEM-2023-0033-0125) and (BOEM-2023-0033-0664)

- Requests a 30-day extension of the comment period, fishery operates between July and October.
- States North Pacific Albacore (NPA) Fishery has consistently asked BOEM for opportunities for engagement in the planning process and that, to date, requests have gone unanswered.
- Endorse comments submitted by RODA to cancel the Draft WEAs, restart the planning process, use the NCCOS model to cover all areas offshore Oregon including beyond 12 nautical miles and 1,300 meters depth.
- Endorses the PFMC draft comment letters as they appear in the Briefing Book for PFMC's November meeting.
- NPA fishing activities take place seaward of any offshore wind facility and care must be taken to ensure fishing industry has safe access to/from ports.
- States that 570 vessels on average participated in the commercial north Pacific albacore fishery between 2012 and 2020, catching 10,300 metric tons and generating approximately \$38.4M in annual ex-vessel revenue.
- Discusses how the Canada-U.S. treaty on Pacific Albacore Tuna Vessels and Port Privileges, signed in 1981 and amended in 2002, permits U.S. vessels to fish in Canadian waters and vice versa, within 12 miles from shore.
- States that offshore wind development off the U.S. west coast may impact the future effectiveness and benefits of the treaty, necessitating careful consideration of potential consequences on fishing activities and port privileges outlined in the agreement.

American Clean Power Association (BOEM-2023-0033-0730)

- Commends BOEM on its efforts to engage Tribal Nations and a diverse range of potentially affected stakeholders, and seek public comment, when neither is required under the agency's regulations.

- Urges BOEM to move forward with the leasing process to ensure the full benefits, both environmental and economic, of offshore wind are realized for the region.
- Discusses two areas within the NCCOS Model that require further review:
 - Claims the NCCOS Model inadequately weighed the importance of the WEAs' commercial viability, as shown by the selection of the portions of the Coos Bay WEA with the highest levelized cost of energy (LCOE).
 - The chosen WEAs unnecessarily exclude a significant portion of the Coos Bay call area, in response to the fairway proposed in the United States Coast Guard (USCG) Port Access Route Study.
- States benefits of development of offshore wind in Oregon includes:
 - Facilitating decarbonization efforts, and ensuring progress towards mandated climate goals, including helping meet the Biden Administration's national goal of producing 30 GW of offshore wind by 2030 and 15 GW of floating offshore wind by 2035.
 - Positive impact on jobs within the state. the Coos Bay and Brookings Call WEAs represent a significant environmental and economic opportunity not only for Oregon, but also for the Northwest region and for the country.
- Restarting BOEM's leasing process by reissuing new Call Areas is both unnecessary and would jeopardize the future of offshore wind development in Oregon.
- Although floating offshore wind technology is rapidly advancing, developing leasing at these greater depths (beyond 1,300-meter isobath) will likely require a longer timeframe than is necessary to meet state, regional, and national climate goals.
- "Commercial viability should be a greater factor in BOEM's deconfliction analysis under the NCCOS suitability mode."
 - Ensure that the areas selected are developable– which includes favorable depth, LCOE, and ocean terrain.
 - Use multiple factors, not a single metric, for determining LCOE in the model.
 - The model weighed other factors, particularly commercial fishing, much more heavily than project viability.
- Draft WEAs also give undue deference to the proposed fairways contained in the Pacific Coast Port Access Route Study PACPARS.

A. Saguibo (BOEM-2023-0033-0904) [Form Letter Master]

- Expresses support for Offshore Wind and the Draft WEAs stating offshore wind presents an opportunity to help Oregon meet its clean energy goals and provide long-term community benefits.
- Urges the Federal government to keep to the existing timelines for the finalization of these WEAs and a lease auction to allow for a transition to a clean energy economy.
- Benefits of offshore wind energy, with the right agreements, includes creation of thousands of jobs in manufacturing, construction, operations and maintenance, and in the development of port facilities, transmission, and other associated infrastructure.
- Urges BOEM to support responsible development that benefits Oregon's working people while minimizing environmental impacts.

American Sportfishing Association (BOEM-2023-0033-0650)

- Recommends enhancing stakeholder engagement, assessing recreational fishing activity, conducting comprehensive research, establishing a formal mediation process, and aligning OSW development with federal/state fishery management.
- A majority of angler trips offshore are on private boats and using charter fishing as a surrogate for private boats is not appropriate.
- Expresses support for improved communication and outreach materials by the BOEM.

- Urges BOEM to provide guidance and permitting criteria suggested for OSW developers regarding recreational fishing activity assessment within lease areas.
- Argues for collaboration with the recreational industry, such as creating a stakeholder or advisory group, to gather specific data on fishing activity within leases.
- Recommends BOEM, NOAA Fisheries and OSW developers establish research priorities and partner with the recreational industry to systematically gather and analyze spatially and temporally explicit data on recreational fishing activity. BOEM must require OSW developers to establish a formal independent mediation process that works to resolve disagreements between the recreational fishing community and OSW developers.
- Advises access plan, monitoring plan, construction and operations plan, and mitigation plans be developed to allow recreational fishing access near wind energy infrastructure and to offset impacts to the fishing industry.

Bailey, B. (BOEM-2023-0033-0544)

- Process should empower impacted communities, investing in local job growth, reducing climate pollution, and equitable access to clean energy.
- Tribal communities along the south coast of Oregon should be able to define the benefits they need to thrive and be directly consulted.
- Pre and post lease NEPA processes should adequately address impacts to wildlife and the marine/onshore environment.

Bailey, N. (BOEM-2023-0033-0670)

- Fully supports comments of and provides letter by Oregon Conservation Coalition: see letter BOEM-2023-0033-0597.

BlueGreen Alliance (BOEM-2023-0033-0607)

- Discusses how use of union labor in offshore wind development can lead to a higher return on investment for taxpayers, support equity goals, and address economic inequality and wage gaps for workers of color.
 - Reasons that unionization enhances worker safety, aligns with Outer Continental Shelf Lands Act (OCSLA) requirements, and studies show higher rates of unionization lead to greater worker safety.
- Discusses how declines in U.S. manufacturing has disproportionately affected workers of color, emphasizing the importance of revitalizing this sector through initiatives like offshore wind development.
- Suggests that manufacturing wages are significantly higher for non-college-educated employees, with workers of color experiencing even greater advantages in the manufacturing industry compared to non-manufacturing sectors.
- Building out a robust domestic supply chain for the growing offshore wind industry can help increase domestic manufacturing.
- Encourages that offshore wind maximizes opportunities for workers to gain access to well-paying jobs that prioritize safety, provide health benefits, and equitable training pathways so that people who have been most impacted by climate change have access to these opportunities.

Bertelson, A. (BOEM-2023-0033-0317)

- Opposes wind power installation off the Oregon Coast, states it would be an environmental disaster.
- Requests more information regarding why BOEM selected the Coos Bay and Brookings Call Areas outside Curry County.

- References the Block Island Wind Farm in Rhode Island as an example of wind projects that, according to the commenter, fail to provide adequate energy outputs for customers.
- Ask questions regarding impacts to offshore marine environments, marine mammals from noise, tourism, cable grids, and cities in Curry County.
- Asks what benefits Curry County will receive such as electricity and profits.
- Advocates for more in-depth environmental analysis of the proposed sites before moving to construction phases.

Best, M. (BOEM-2023-0033-0736)

- Brookings, Oregon resident and is opposed to the project due to daytime/nighttime visual impacts and impacts to wildlife from structures and processes such as noise on marine mammals.
- Implores another location or alternative energy source be used.

Busch, J. (BOEM-2023-0033-0708)

- Expresses general support for offshore wind development to address climate change, meet energy needs, and provide new and better economic opportunities for Oregon.

Bilderback, D. and D. (BOEM-2023-0033-0677)

- Raises concerns about potential ecosystem impacts resulting from the placement of turbines in areas crucial for nesting birds and marine mammal movements during nesting seasons.
- Advocates for a West Coast-wide Programmatic Environmental Impact Statement (PEIS) or a similarly comprehensive cumulative impacts assessment before finalizing the siting process.
- Supports the removal of the NMFS-recommended protected species Leatherback sea turtle exclusion area in the draft Coos WEA.
- Endorses the NMFS-recommended removal of the Blue/Humpback Whale foraging exclusion area in the draft Brookings WEA to minimize impacts on coral habitats and Short-tailed Albatross.
- Would like to see further analyses on upwelling impacts from wind arrays.
- Concerned with electromagnetic fields from transmission lines on invertebrates and small fish, nesting/foraging Leach's Storm Petrel and Rhinoceros Auklets in the Brookings WEA, and wildfire hazards from onshore transmission electrical lines.

Buchanan, C. (BOEM-2023-0033-0617)

- Suggests BOEM failed to adhere to NEPA requirements, particularly as they pertain to impact assessments on electromagnetic fields on marine mammals and birds.
 - Commenter argues that electric cables are a problem in the designs of over 1,000 turbines and BOEM does not know for certain whether such cable lines will pose a danger to coastal residents.
 - NEPA should evaluate socioeconomic, tourism, and environmental impacts along the entire West Coast, from Mexico to Alaska.
- Raises concerns that “waste heat” will negatively impact migratory pathways of at-risk and endangered species.
 - Also expresses concerns that cables will interrupt migratory patterns of avian species.
- Offers many questions on offshore wind develop and operational impacts such as how many platforms will be installed, why no discussion on electromagnetic fields or horizontal drilling, why no research on clean incinerators, and loss of redwoods due to hauling turbine parts.

Burley, R. (BOEM-2023-0033-0425)

- Expresses concern with the visual and auditory impacts of offshore development and suggests that BOEM plan areas elsewhere and implement sound abatement procedures.

- States the visual impact of wind turbines would harm the tourism industry and economically impact adjacent communities and suggests measures to mitigate economic impacts.
- Requests studies be completed to understand the impact on fisheries, marine life, wildlife, and bird populations.

Business Oregon (BOEM-2023-0033-0756)

- Urges consideration of insufficient housing inventory on the southern Oregon coast.
- States that infrastructure upgrades would need to be addressed prior to offshore wind development.

C. Cameron (BOEM-2023-0033-0043)

- Expresses concern that the Oregon draft suitability report for offshore Oregon is insufficient and neglects risks of a major earthquake and tsunami along the Cascadia Subduction Zone within the next 50 years.
- States a major Cascadia earthquake and tsunami would likely destroy or damage any infrastructure associated with floating wind development, including offshore and adjacent coastal communities.
- Encourages BOEM to review and implement the action items included in their referenced attachment title, “Recommendations for Our State’s Congressional Delegation Concerning Earthquake/Tsunami Hazards and BOEM’s Plans for Leasing for Offshore Wind Development along the Pacific Coast of WA, OR, and Northern CA.”
- A key recommendation includes conducting a PEIS prior to further leasing for offshore wind development, including assessment of the impacts of geohazards.
- The commenter provides additional supplemental attachments related to geohazards and impacts on fisheries.

California Fishermen’s Resiliency Association (BOEM-2023-0033-0416)

- Expresses “full agreement” with the statements submitted by the Pacific Fisheries Management Council (PFMC) and RODA.
- Expresses opposition to siting OSW on community fishing grounds.
- References public comments submitted at a 2022 joint State and Federal agency meeting and asks that additional West Coast wind energy projects be delayed until “insignificant negative environmental impacts” can be ascertained.
- States there is deficient environmental assessment in the Oregon Draft WEAs for impacts to seabirds and upwelling.
- Suggests the California lease areas be treated as “experiments” to inform knowledge of the consequences of energy mining in ocean environments.

Carpenters Local 541, Chris McGee (BOEM-2023-0033-0239)

- States that labor supports offshore wind, citing job creation and economic benefits.
- Expresses interest in a community benefits agreement that is tied to the long-term lease agreement and includes “a living wage, local hiring and affordable housing.”

CFACT (BOEM-2023-0033-0686)

- Expresses general opposition to the Call Areas.
- Reasons that since the first floating wind turbine deployed in 2007 the only operational facility is a 88 MW Hywind Tampen facility in the North Sea, which is not yet at commercial scale.
 - Commenter suggests that the Call Areas are likewise uncertain to be cost efficient.
- States the effort, money, and time required for building and maintaining floating wind turbines is significantly higher than monopiles.

- Says it would be prudent for BOEM to wait and observe developments in California before allocating more acres off Oregon.
- Argues that only time can determine if a California floating wind project will be able to secure a Power Purchase Agreement from an onshore utility, which may be unlikely if the price is too high.
- Says the leap from an 88 MW experimental facility to facilities producing 4,600 MW is technologically improbable, recommending a cautious, measured approach with careful scaling up from prototypes like Hywind Tampen.
- Asserts that BOEM's belief in the current viability of floating wind technology is disputed, suggesting that cost analysis is necessary, with studies indicating that the costs of deploying floating wind will likely be more than double that of fixed offshore wind.
- States that DOE's "Floating Offshore Wind Shot" research program aims to reduce the cost of floating wind facilities, but significant cost reductions may be unlikely.
- Recommends BOEM carefully review Construction and Operations Plans, Facility Design Reports, and Fabrication and Installation Reports for cost and technical feasibility.
- Argues that fabrication and installation of floating wind structures pose challenges, including the need for specialized ships that do not yet exist and the complexity of burying and maintaining power export lines in deep water.

Cheryl Hoits (BOEM-2023-0033-0477)

- Expresses concern of adverse impacts to “cultural sites, usual and accustomed places, traditional resources, religious practices, and other ceremonial uses.”
- Expresses concern of impacts to the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians, including reduced access to fresh seafood and potential employment or business costs.
- Asks BOEM to exclude all, or substantial portions of, the Coos Bay Call. Asks BOEM to avoid or mitigate impacts associated with transmission and “access needs” on ancestral homelands.
- Requests exclusion of areas that would impact resources.
- Asks BOEM to site turbines in locations that protect fisheries, species, and cultural resources.
- Asks for assessment of the economic, ecological, and social benefits and burdens associated with a “Floating Offshore Wind Array.”

City of Brookings (BOEM-2023-0033-0378)

- Expresses opposition to the offshore wind energy project, citing concerns about:
 - Impacts to the commercial fishing industry, tourism, environment, and marine species;
 - Leasing turbines to “out-of-state, out-of-country entities;”
 - Noise effects on wildlife behavior,
 - Electro-magnetic field impacts to fish and whales; and
 - Costs of maintenance and dismantling turbines.

City of Florence (BOEM-2023-0033-0041)

- Recommends updating the map on the webpage to include the City of Florence.

Clatsop County (BOEM-2023-0033-0460)

- Identifies ecological risks, vulnerability, and indirect impacts from offshore wind, and supply chain vulnerability from geopolitical situations, higher inflation, and capital costs as primary concerns to the energy sector.
- Makes several requests, including:
 - Rescind the Call Areas.
 - Restart the planning process and use spatial planning tools to mitigate impacts to fisheries and ecosystems.

- Study and review concerns associated with marine habitats, marine birds and mammals, and environmental impacts.
- “Prioritize 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 use of areas in terms of economic benefit to Oregon and the Oregon Coast;” and
- Ensure that offshore generation is cost effective, beneficial to residential and business customers, and environmentally and economically sound.

Climate, Energy & Environment Team, Consolidated Oregon Indivisible Network (BOEM-2023-0033-0263)

- Urges BOEM to move forward with the development and designation of areas off Oregon’s Southern Coast while also addressing concerns of local residents and communities.
- Suggests engaging community members that identify negative impacts or express concern about challenges to their way of life.
- Suggests that offshore wind could yield economic benefit to “this economically challenged region of the state.”

Climate Reality Project, Portland Chapter (BOEM-2023-0033-0567)

- Urges BOEM to continue exploring offshore wind benefits for local communities in Oregon and the Pacific Northwest region.
- States the importance of a robust, thoughtful, and timely process to maximize offshore wind's potential for community and climate benefits.
- Expresses support for BOEM’s process.

Coalition of Coastal Fisheries and Columbia River Crab Fisherman's Association (BOEM-2023-0033-0800)

- Provides “clarification to my public comments after the Oregon Task Force meeting.”
- Urges BOEM to complete an EIS based on choosing the best alternative that avoids conflict with fishing.
- States that a NEPA EIS prior to identifying WEAs could help identify areas that produce optimal offshore wind energy potential, avoid conflict between the environment and fishing, and prevent adverse impacts to coastal communities and a States a NEPA EIS is appropriate considering the potential impact of WEA development on the Pacific Coast ecosystems and environment.
- Urges BOEM to consider economic impacts to fishing as well as fatality rates associated with crab fishing.
- Provides a general file with references to many citations with concerns of a new, emerging offshore wind industry and its impacts to fishing communities including, but not limited to, dislocation, net decrease in fishing income, navigational conflicts, and environmental justice.

Climate Solutions (BOEM-2023-0033-0719)

- Offshore wind is a potentially important strategic resource to meet the mandates of HB 2021 and Oregon’s decarbonization goals more broadly; however, the challenges associated with planning and developing offshore wind, and integrating it into Oregon’s electricity grid, are significant.
- Urges continuous engagement with Tribal governments.
 - Argues that Tribal consultation provisions under Section D need revisions.
 - Expresses concern that Section D only covers Atlantic region and should include Pacific region.

- Argues that features of a Regional Programmatic Environmental review should include project analysis, “avoid, minimize, mitigate, and monitor potential impacts” (AMMM) measures, focused cumulative analysis, and identification of impacts.
- States that while 30 data layers were selected for spatial modeling, public feedback suggests additional layers are needed.
- Expresses general concern that biological assessments are too narrow, particularly as they relate to birds and marine mammals.
 - Urges for more assurances to mitigate bird collisions.
 - Asserts turbines may displace and disrupt the migratory routes of birds.
- Supports strong labor standards through any construction phase.
- Endorses “Just Transition” principles for offshore wind development.

Confederated Tribes of Coos, Lower Umpqua & Siuslaw Indians (CTCLUSI) (BOEM-2023-0033-0653)

- Requests that the BOEM halt finalization of the Draft Wind Energy Areas until more information regarding impacts can be understood.
- References and provides an attachment of Resolution 23-153, stating that the Resolution affirms the Tribe’s promotion of its identity and recognition of tracts of the Coos Bay estuary, *Q’alya ta kukwis shichdii me*, as a Traditional Cultural Property (TCP).
 - Adds that the Resolution expresses CTCLUSI’s opposition to offshore wind development.
- Cites and reiterates prior 2021 and 2022 communications or meetings with BOEM to assert that:
 - BOEM’s engagement with CTCLUSI has been one-way conversation; and
 - BOEM has disregarded issues of concern to the CTCLUSI.
- Asserts a direct interest in the viewshed extending from shore to a distance of at least twelve nautical miles beyond the continental shelf; ability to see across viewsheds is integral to cultural practices and traditional way of life.
- Asks BOEM to exclude all or “substantial portions of the Coos Bay Call” to mitigate adverse impacts to cultural resources.
- Asks BOEM to avoid or reduce impacts associated with transmission and access needs.
- Continues to ask BOEM to employ “meaningful consultation” so as to avoid or address negative impacts and cites Executive Order 13157.
- Requests the inclusion of CTCLUSI in “management and decision making” for the environmental resources within its “Ancestral Territory and ancestral coastal waters.”
- Requests that BOEM provide funding to and resolve, through consultation, harms to Tribal Nations.
- Asks BOEM and DOI to “develop joint powers agreements, memorandum of understanding and co-management agreements for all lands, waters, coastlines, aquifers, resources, etc. that are not currently available for transfer.”
- Expresses concern that BOEM has not included any spatial analysis modeling that includes cultural data, such as traditional cultural areas or other data that may trigger provisions of the National Historic Preservation Act.
- References the Key Observation Point study and requests that BOEM include visual impacts in the suitability model and report.
- Expresses additional concerns regarding changes to atmospheric and oceanic dynamics due to energy removal and modifications; structural impediments to wildlife; changes in bird abundance due to collision mortality and displacement, changes in distribution patterns, and alteration of behavior to avoid offshore wind facilities; collisions with seabirds, whales, and turtles; pile driving impact on mammal's abundance and distribution; wildlife entanglement; and wildlife displacement due to noise and vessel traffic.

- Expresses concern research and data is not sufficient to advance with offshore wind development.
 - Cites the Farr et. al, 2021 study to discuss modifications in atmospheric and oceanic dynamics as well as impediments to wildlife.
- Asks BOEM to halt finalization of the WEAs until the National Academies of Science, Engineering, and Medicine study and recommendations are completed and resolved as well as to advocate for the inclusion of CTCLUSI in this assessment.
- To mitigate impacts to species, urges BOEM to conduct a comprehensive siting analysis.
- Urges BOEM to consider transmission line and economic feasibility and impacts as well as cumulative impacts.
- Recommends that BOEM “include tribal consent as a core criterion for siting and designing any offshore energy projects on the West Coast,” referencing BOEM’s trust responsibilities.

Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians (CTCLUSI) (BOEM-2023-0033-0121)

- Requests a 30-day extension of the comment period.
- States that the allotted time to review the Draft WEAs is insufficient to consider potential impacts on fisheries, viewsheds, and other resources.

Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians, J. Siestrem (BOEM-2023-0033-0343)

- Expresses various concerns, including the adverse impact of wind turbines on marine life and the environment; DOD, commercial, and private sea vessels; and viewsheds.
- Expresses concern about the adverse impact of wind turbines on the “cultural, historical, and spiritual practices” of the CCTLUSI.
- Says “BOEM has told us action would not be taken without Tribal approval. However, here we are today, discussing where BOEM is at currently in their process ...”
- Asks for the projected to be paused and cites prior requests from the Tribe to exclude areas that would impact viewsheds.

Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians (BOEM-2023-0033-0344)

- Asserts that “the absence of true respect for tribal sovereignty within federal agencies” should be rectified, citing the Tribe’s request to exclude “important areas” that are nevertheless included as part of the call areas.
- States that turbines within the viewshed would adversely impact marine life migratory pathways.
- States that the National Academy of Science fisheries study should be completed before engaging in consultation.
- Asks BOEM to halt the project to allow the Tribes to be “well-informed and actively involved.”

Conway, F. (BOEM-2023-0033-0465)

- Asserts that rushing into the designation decision for offshore wind areas (WEAs) without thorough analysis and review may lead to poor economic, environmental, and sociocultural impacts.
- Questions the effectiveness of floating offshore wind energy, citing its higher costs compared to bottom-fixed offshore wind and land-based wind, as well as the potential negative impacts on conservation.
- Asserts we must take a thoughtful and active approach to coping with climate change and energy security but suggests the country focus on a different approach to floating offshore wind such as land-based alternatives or change in energy reduction policies.

Coos County Commissioner Board Chair, State of Oregon BOEM representative (BOEM-2023-0033-0126)

- Asserts BOEM process should be halted indefinitely.
- Reasons for halting include:
 - Disruption to, or endangerment of, marine mammals, migrating salmonoids, plankton, and sea birds;
 - Environmental impacts such as “local warming,” reduced precipitation, and ocean pollutants;
 - Adverse impact on fishing industry;
 - Turbine maintenance; and
 - Cost burden on rate payers, among other reasons.
- Discusses the Virginia Dominion Wind Project and the Rhode Island Block Island Wind Project. According to the commenter, both projects passed costs on to rate payers.

Coos County Commissioners (BOEM-2023-0033-0480)

- Expresses opposition citing concerns about impacts on environmental resources and species and potential interference with ship radar and navigation.

Coos County Commissioners (BOEM-2023-0033-0481)

- Expresses opposition to the offshore wind project, citing concerns about turbine durability and lifecycle, the Oregon legislature’s potential enactment of “feed in tariff,” associated costs to ratepayers such as in the Virginia Dominion Wind Project and the Rhode Island Block Island Wind Project, and impact on the fishing industry and endangered bird populations, among others.

Coos-Curry County Farm Bureau (BOEM-2023-0033-0381)

- Urges BOEM to reject leases for commercial offshore wind energy projects in the Draft WEAs.
- Expresses concern about the impact to shipping lanes as well as the impact of “potential new power lines.”
- Identifies a need for:
 - A “yearlong trial” of turbines;
 - An economic impact study regarding fishing and shipping industries;
 - An environmental impact study on marine and avian species; and
 - An infrastructure study.

Coquille Indian Tribe (BOEM-2023-0033-0570)

- Expresses concern about the impact of wind energy development on the region of the Coquille Indian Tribe.
- Requests that “all Interior agencies working on this matter engage in formal Consultations,” asserting that an acceptable level of “Consultation or mutual agreement” has not yet been reached.
- States that there is “little to no information” of how statutory responsibilities under NEPA, CWA, CAA, or NHPA would be satisfied.
- Expresses concern that “the analyses and consultations statutorily required for wind energy projects will be balkanized across multiple individual leases and/or agencies.”
- Requests an extension to the public comment period.

Cow Creek Band of Umpqua Tribe of Indians (BOEM-2023-0033-0692)

- Expresses concern about potential impacts to environmental and cultural resources such as “first foods of the Tribe,” urging BOEM to have a “plan for avoidance that is brought to the Tribe through government-to-government consultation.”

- Requests BOEM avoid impacts to cultural resources and have a plan for avoidance that is brought to the Tribe through government-to-government consultation.
- Requests additional information regarding:
 - Impacts to fish, wildlife, and their habitats;
 - Effects from potential earthquakes and tsunamis
 - Financial costs and feasibility of the project;
 - Transmission line construction and operational responsibility; and
 - Where electrical power produced may be consumed and benefit Oregonians.

Curry County Board of Commissioners (BOEM-2023-0033-0473)

- Expresses “unanimous” opposition to offshore wind energy development off the coast of Curry County.

Corio Generation (BOEM-2023-0033-0585)

- States that Oregon could offer an opportunity to expand the “bicoastal nature” of offshore wind.
- Asks BOEM to consider acreage that maintains flexibility and enables industry to determine whether an area is “too conflicted for commercial viability.”
- Discusses issues associated with offshore wind in the Pacific Northwest, including:
 - Water depth;
 - Financial investment associated with interconnection and integration into the grid;
 - Lack of ports and supply chain; and
 - Potential risk to marine species.
- Asks BOEM to prioritize discussions with the DOD, reasoning that Coos Bay and Brookings “fall within important special use airspace.”
- Asks BOEM to retain flexibility with developers and to “clear the way with the many other regulators and governmental actors.”

Curry County Board of Commissioners (BOEM-2023-0033-0260)

- Expresses unanimous opposition to the development or installation of wind energy equipment, facilities, and structures off the coast of Curry County.

Davis, K. (BOEM-2023-0033-0521)

- Urges BOEM to conduct a PEIS or cumulative impacts analysis to consider larger, ecosystem-wide issues.
- Expresses need for a comprehensive assessment that considers the wide-ranging movements of seabirds, whales, and fish across multiple areas under consideration for wind development.
- States current WEAs do not adequately protect the leatherback sea turtle, whale foraging, and Leach’s storm petrel exclusion areas.
- Urges BOEM to include an upwelling analysis in their modeling efforts to inform siting recommendations.
- Raises concerns about how electromagnetic fields (EMF) from transmission cables may impact invertebrates and fish.

DecisionWare Group (BOEM-2023-0033-0580)

- Supports Governor Kotek for emphasizing the need for a comprehensive and inclusive public process.
- Urges BOEM to explore offshore wind's benefits for coastal communities and engage historically marginalized groups.
- Discusses the importance of understanding and mitigating environmental impacts on Oregon's coast.

- Argues that offshore wind offers a partial solution to solar variability, contributing to grid reliability.
- Supports adding 2 GW of offshore wind capacity in southern Oregon for grid reliability benefits.

Doolittle, K. (BOEM-2023-0033-0304)

- Is against this project.
- Asserts that there is a lack of peer-reviewed studies on the efficacy of offshore wind.
- Argues that there is an absence of operational offshore wind parks of similar size anywhere on the planet.
- Questions the comparability of smaller wind parks' impact studies to the proposed project.
- Advocates for relocating the project somewhere else with similar conditions and wait a couple decades to learn environmental impacts, such as whale deaths, are better understood, citing potential devastating effects.
- Argues jobs that could be created will not be for local residents and an influx of non-resident workers will strain the city's existing housing and supply chains.
- The project funding costs and maintenance operations will be borne by residents.
- Provides concerns with offshore wind including increased ocean noise and vibration, large scale impacts to marine ecology, bird collisions, pollution from contaminants inside turbines such as heavy metals and hydraulic fluid, impacts to tourism, and untested technology.
- Asks questions such as how fish and wildlife will be protected, will untested technology survive in offshore Oregon storm events, how oil spills from turbines leaks be cleaned up, and Federal government will fund clean-up procedures.

Douglas County Board of Commissioners (BOEM-2023-0033-0482)

- Expresses opposition to BOEM's planning process citing concerns about marine ecosystems and biodiversity, disruption to marine life, pollution, and potential impact to commercial and recreational fisheries and local businesses.

Early Fishing, Inc. (BOEM-2023-0033-0384)

- Expresses opposition to offshore energy on the Oregon coast and asserts that Oregon "has not produced a plan" and has "set aspirational goals only."
- Expresses concern that Feed in Tariff clause could allow investors to pass on infrastructure-related costs to ratepayers.
- Expresses the following concerns:
 - BOEM has not conducted a cumulative impacts analysis regarding birds, fish, and wildlife.
 - BOEM has not sufficiently analyzed how wind energy arrays could impact upwelling or the impact of wind energy arrays on critical habitat for endangered species, and EMF impacts from transmission cables on invertebrates and fish.
 - BOEM has not conducted baseline studies.
 - BOEM has not sufficiently considered how wind energy installations will interconnect with "major transmission lines" that have high risk for wildfires, erosion, and earthquakes.
 - Local fishermen and wildlife could be potentially impacted by wind energy development.
 - NMFS fishery surveys could be impacted by the location of Brookings WEA.
 - Impacts would create burdens for the region and communities.
 - Impacts on views of coastal State parks.
 - Privatizing and industrializing marine ecosystems, as well as increasing oil spill potential.
- Urges BOEM to take the risk of wildfires, landslides, and earthquakes as well as State parks and habitat values into consideration.

Elk Valley Rancheria, California (BOEM-2023-0033-0517)

- Requests government to government consultation on the Oregon Draft WEAs.
- States that the Draft WEAs located within the Brookings and Coos Bay Call Areas will impact the interests of the Elk Valley Rancheria, California Tribe.
- References the September 2021 Biden administration’s Tribal consultation policy.
- Urges that consultation and decision-making should account for preservation of Tribal cultural practices, consultation and collaboration, conservation and access, local and traditional knowledge, economic considerations, and adaptive management.
- Expresses concern about environmental impacts.
- Asserts that “OSW consultation for the California WEAs has mostly failed to address the Tribe’s and region’s needs resulting in a process that will effectively ignore our concerns.”

Elfman, L. (BOEM-2023-0033-0530)

- Expresses concern about the potential adverse impact on marine ecosystems, particularly the seabed.
- Raises concerns about the potential threats to threatened and endangered species, including Leatherback sea turtles, Humpback whales and Leach’s Storm Petrels.
- Expresses worry about the high-risk factors in the area, including wildfires, erosion, and earthquakes.
- Expresses concerns about the potential privatization and industrialization of marine ecosystems and the associated risks, such as oil spills in highly productive areas.

Englund Marine Supply (BOEM-2023-0033-0250)

- Requests a 30-day extension of the comment period.
- Expresses concern about the impact of the WEAs on customer base and an extension can help parties understand potential impacts.

U.S. Fish and Wildlife Service (FWS) (BOEM-2023-0033-0723)

- Comment included four distinct attachments: one cover letter, a technical analysis and two reference documents.
- Comments discuss considerations for siting, policies related to invasive species, adaptive management and cumulative effects, the mitigation of impacts to migratory birds, federally listed species, species of concern, and their habitats.
- Recommends using all possible measures to prevent the introduction or proliferation of invasive species.
- Suggests that BOEM “incorporate available techniques into the design of any floating wind array to inform monitoring and adaptive management.”
- Encourages BOEM to work with the Service in the early stages of project planning to mitigate effects on species and their environments.
- Recommends that the spatial suitability model include “observed and tagged location data of short-tailed albatross.”
- Recommends employing observational studies to assess potential overlap of the proposed areas with Hawaiian petrels.
- Recommends BOEM conduct studies to determine if EMF adversely impact marbled murrelet prey species.
- Discusses ESA-listed species that could be impacted by onshore activities associated with offshore wind development.
- Provides recommendations related to bats, including:

- Conduct baseline and post-construction monitoring employing multiple survey methods;
- Make results available for statistical analyses;
- Support passive acoustic surveys in the WEAs using tracking technologies; and
- Employ impact reduction strategies for bats.
- References the recommendations provided in the Service’s 2022 letter and further recommends that BOEM “continue to consider our prior comments” on natural resource issues related to migratory birds.
- Discusses WEAs, seabirds, and marine birds and states that monitoring must be conducted prior to, and after, construction to mitigate project impacts.
 - Suggests drawing upon the work conducted by Oregon State University to track seabird movements to inform final WEAs selection.
- Suggests that the Coos Bay WEA (WEA-A) be restricted such that any placement of wind development is as far from Heceta Bank as possible.
 - Identifies Heceta Bank as a “hot spot for fisheries and seabird activity.”
- States there are existing knowledge gaps about the impacts of offshore wind development and urges BOEM to address such gaps.
- Provides multiple recommendations to mitigate impacts on migratory birds and bats through research, conservation, and surveys and monitoring, including:
 - Support tracking and remote monitoring technologies to document migration corridors, flight patterns, and the interaction of birds with wind installations;
 - Focus conservation measures on the species that would be most impacted by the offshore environment;
 - Develop actions to offset impacts when minimization or avoidance is not possible;
 - Gather “baseline data on species occurrence and use prior to site development and monitor impacts to species and their habitats throughout the life of the lease;”
 - Gather environmental condition data associated with the Pacific bat to bolster understanding of migratory and non-migratory patterns and inform infrastructure placement; and
 - Disseminate offshore bat activity records with the North American Bat Monitoring Program (NABat) for further statistical analysis, among others.
- Requests collaboration with agency partners to identify the least impactful opportunities for cable routes to avoid sensitive habitats.
- Encourages BOEM use the Service’s IPaC system (<https://ipac.ecosphere.fws.gov/>) to identify the areas of least conflict throughout planning.
- Encourages BOEM to consider the cumulative impacts of offshore wind development on birds.

Fitch, R and A. (BOEM-2023-0033-0739)

- Suggested need for a more thorough study with a public comment period that addresses the impacts to habitat, wildlife, fishing and Tribal culture.
- States need to mitigate any damage to ocean habitat and migration species.

Foss, J. (BOEM-2023-0033-0277)

- Cites a 3 GW wind farm off the coast of Grimsby, England as evidence in support of the argument that power bills will increase as a result of windmill construction.
- Suggests the Cascade Subduction Zone has potential for a 9.0+ earthquake and subsequent tsunami.
- Asserts turbine components wear out and there is a lack of recycling options for blades. Expresses concerns about the dependence on China for manufacturing components and acknowledges the uncertainties in diplomatic relations with China.

Gorham, B. (BOEM-2023-0033-0527)

- Raises general concerns that communities surrounding the Call Areas were not adequately provided an opportunity to give BOEM input.
- Argues that a Preliminary Cumulative Effects Assessment (PCEA) should be developed before leases awarded.
- Suggests that turbines would have unforeseen consequences on grid reliability and may lead to higher costs for main transmission line customers.

Graybill, M. (BOEM-2023-0033-0705)

- Criticizes the suitability model used by BOEM for not representing current market conditions in determining Draft WEAs.
- Expresses concerns about the potential costs of floating wind technology.
- Urges BOEM include most recent LCOE values for bottom-fixed offshore wind technology.
- Recommends the inclusion of an upper LCOE value beyond which development should reasonably be classified as "infeasible."

Hodder, J. (BOEM-2023-0033-0685)

- Argues that there is a lack of comprehensive data on the California Current Large Marine Ecosystem, suggesting the necessity for more information on physical oceanography, upwelling, benthic environment, plankton communities, and climate change impacts.

Hartzell, K. (BOEM-2023-0033-0326)

- Discusses the proposed wind turbines' visibility in the video simulation and impact on the scenic coastline.
- Raises concerns about the placement of turbines directly where the sun sets during a significant portion of the year.
- Expresses concern that the proposed wind turbines could deter tourism.
- Urges decision-makers not to proceed with the installation of wind turbines off the coast, emphasizing the potential harm to the Wild and Scenic designation.

Heather PerryPerry (BOEM-2023-0033-0060)

- Expresses concerns about the lack of accurate environmental risk assessments and long-term studies for floating wind farms.
- States that there is a limited number of short-term studies on prototypes with estimated lifespans of 15 years.
- Suggests that there are challenges in constructing turbines able to withstand Pacific Ocean conditions.

Holfinger, J. (BOEM-2023-0033-0637)

- Expresses concerns over the EMF generated by transmission subsea cables, suggesting fields increase with voltage.
- Refers to studies (Klaustrup, Frike, Poleo, Gill, and Taylor) demonstrating the impact of electromagnetic fields on marine animals.
- Argues that cable placement is important factor in whether windfarms have adverse impacts on migratory pathways.

Hornstuen, K. (BOEM-2023-0033-0574)

- Expresses concerns over lack of a comprehensive environmental analysis of the Call Areas.
- Criticizes the reliance on future studies, especially those conducted on the east coast, without considering the unique characteristics of the west coast.

- Raises concerns about radar interference.
- Questions estimates of the tracking of West Coast birds and the potential harm to bird populations due to future tracking inadequacies.

International Union of Operating Engineers Local 701 (BOEM-2023-0033-0540)

- Asks BOEM to consider union wages and family healthcare, union apprenticeship and workforce training, domestic supply chain for local manufacturing, union and card check neutrality, and stringent health and safety standards when finalizing the WEAs.
- Urges BOEM to advance without delay.
- Urges BOEM to work toward offshore wind development that benefits Oregonian workers and mitigates impacts to the environment.

International Brotherhood of Electrical Workers (BOEM-2023-0033-0713)

- Expresses general support for strong union and labor standards.
- Urges BOEM to take all available measures to expedite the approval of the proposed WEAs for the Oregon coast.
- States “urgent action is necessary because the Inflation Reduction Act (IRA) prevents BOEM from issuing new offshore wind leases unless, within the year preceding the issuance of the lease, BOEM holds at least one offshore oil or gas lease sale and offers sixty million acres for offshore oil or gas leases.” With BOEM’s last guaranteed offshore oil and gas sale scheduled for September 2023, September 2024 is now the deadline for offshore wind lease sales unless Congress takes action.
- States the proposed WEAs support existing Federal and state climate goals, and provide significant economic, social, and environmental justice benefits, including the ability to create good, union jobs, particularly in local and disadvantaged communities.

International Brotherhood of Electrical Workers Local Union 932 (BOEM-2023-0033-0714)

- Suggests an offshore wind project could lead to permanent jobs: 3,300 for operation and maintenance.
- Urges BOEM to swiftly approve Draft WEAs for community resilience and power stability.
- Discusses considerations for siting offshore wind towers: maximize wind efficiency, minimize impact on ocean environment, reduce exclusion zones, and adhere to depth and distance limits.
- Advocates for strong labor standards for offshore wind leases: 15% apprenticeship utilization, registered Training Agents, compliance with labor laws, Oregon prevailing wage rates, PLAs for construction, and local hiring requirements.

International Brotherhood of Electrical Workers, AFL-CIO, CLC (IBEW) (BOEM-2023-0033-0734)

- Expresses general support for offshore construction and advocates for union protections for workers involved in such construction.

International Brotherhood of Electrical Workers (IBEW) Local 125 (BOEM-2023-0033-0528)

- Expresses general support for the Draft Wind Energy Areas as proposed.
- Supports high-wage job opportunities and advocates for apprenticeship opportunities during the construction phase.

International Longshore and Warehouse Union (ILWU) (BOEM-2023-0033-0709)

- Expresses general support for labor and unionization standards for workers involved in any construction.

- Priority to ILWU that jobs created from offshore wind do not displace existing workforce that traditionally performs this type of work.
- Requests BOEM require union labor for any future projects.

Ironworkers Local 29 (BOEM-2023-0033-0614)

- Expresses support for BOEM's efforts and identified ties with Oregon's 100% clean energy goal.
- Urges BOEM to ensure workers have access to a union agreement and environmental justice in offshore wind development.
- Asserts that union apprenticeship and pre-apprenticeship programs essential for diverse workforce entry and higher pay.
- Argues unionization closes wage gaps for women and BIPOC, offering fair systems for compensation and equal pay.
- Suggests that BOEM should require basic labor standards, Community Workforce Agreements, PLAs, and prioritize quality workforce development.

IUPAT Painters Local 10 (BOEM-2023-0033-0127)

- Expresses support for BOEM's efforts to achieve the Biden-Harris Administration's national wind energy goal as well as Oregon Governor Kotek's request for a brief pause to engage stakeholders.
- Discusses the responsible development of offshore wind and quality jobs, including union jobs.
 - Asserts that using union labor for offshore wind development can support the return on investment for taxpayers as well as the equity goals of the administration.
 - Urges BOEM to use its authority to create an offshore wind industry that:
 - Maximizes the creation of union jobs throughout the lifespan of a project;
 - Expands domestic manufacturing along a robust supply chain;
 - Delivers community benefits and community oversight with attention to:
 - Stakeholder engagement, including disadvantaged communities; and
 - Improving access to benefits, including jobs, for BIPOC and low wealth communities; and
 - Protects wildlife and marine ecosystems by avoiding, minimizing, mitigating, and monitoring impacts over the course of development, including through the utilization of the best available science and data.
 - Deploying offshore wind in a way that achieves these four tenets of responsible development is aligned with federal statutes and recent Executive Orders.
- States that offshore wind should maximize opportunities for workers to access well-paying jobs that prioritize safety, health benefits, and equitable training pathways.
- States that BOEM should require developers to prioritize job quality, quantity, equity, and environmental protection.
- Discusses Executive Orders issued by President Biden to assert that all agencies, including BOEM, should develop clean energy technologies, combat climate change, and strengthen domestic supply chains.

Jon Silva, F/V Jeanette Marrie, Inc. (BOEM-2023-0033-0286)

- Requests a 30-day extension to the comment period to conduct research on aliquots and gather more information.

Joyce, E. (BOEM-2023-0033-0038)

- Expresses general support for offshore wind areas on Oregon's south coast.
- Acknowledges local environmental disruptions will occur with offshore wind technology.

- Advocates for thorough mitigation of potential disruptions to the coastal environment.
- Calls for a perspective that weighs local environmental disturbances against global warming.

Kalmiopsis Audubon Society, Portland Audubon, American Bird Conservancy, Surfrider, Audubon Society of Lincoln City, Lane County Audubon, Oregon Shores Conservation Coalition, Audubon Society of Corvallis, Umpqua Audubon Society, American Cetacean Society (BOEM-2023-0033-0340)

- Requests at least a 30-day extension to the comment period.
- Expresses support for other groups who requested a similar extension.

Karuk Tribe (Letter Emailed to BOEM)

- Expresses concerns about impacts on fisheries resources and questions what offshore wind turbines may do to salmon, lamprey, and other anadromous species populations.
- States this this project development is an opportunity to establish endowment(s) to support ongoing stewardship, management, and reciprocal indigenous relationship with the functional ecosystem processes.
- Expresses concern for impacts that the turbine and transmission placements could have on fish populations or the ecosystem since the Karuk Tribe depend on salmon and other anadromous species as a staple food source.
- Questions whether the projected turbine placement will deter fish species from entering spawning, rearing, holding or refugial areas hosted by the Klamath River and other freshwater tributaries leading to the Pacific Ocean.
- States that lamprey is a key fisheries resources and is sensitive to electromagnetic influences, and questions if there is data on how a project will affect lamprey and the Tribe’s access to the traditional food source.
- States that the Tribe understands the future positive impacts could have on communities.

Kollitz, A. (BOEM-2023-0033-0602)

- Argues that offshore wind is not an appropriate energy choice for Oregon.
- Asserts offshore wind insufficiently addresses reducing CO2 emissions and entropy.
- Argues that the costs of windfarm development are incommensurately higher than energy outputs.
- Expresses concerns that construction of turbines will damage the marine environments off Oregon’s coast.

Kranowski D. (BOEM-2023-0033-0456)

- Advocates for measures to deter any negative impacts on coastal viewsheds and lists several mitigation measures, including increased distance from shore, smaller turbines, siting in deeper water depths and narrowing spacing between turbines.

Lane County Government (BOEM-2023-0033-0743)

- Raises several concerns about Draft WEA-A as discussed in “BOEM Docket No. BOEM-2023-0033, “Draft Wind Energy Areas – Commercial Leasing for Wind Power Development on the Oregon Outer Continental Shelf (OCS)” Report Section 5a) “BOEM Identification of Draft WEAs”, Page 15” as well as concerns expressed by the CTCLUSI.
- States that several organizations were unaware of outreach about offshore wind energy efforts.
- Says “we cannot offer support for this Draft WEA-Option A in the Coos Bay Call Area.”
- Addresses need for more information and asks to be consulted should BOEM move forward with Final WEAs to provide further feedback.

Leonard, M. (BOEM-2023-0033-0539)

- Raises concerns about potential impacts to military radar and marine radar capabilities.
- Draws a parallel between military radar and the potential effects on whale sonar.
- Refers to various studies on marine vessel radar due to wind development.
- Mentions concerns expressed by Finnish and Taiwanese military officials about the effects of offshore wind farms on their defense capabilities.

M. Darienzo (BOEM-2023-0033-0582)

- Expresses general support for offshore wind development in Oregon.
- Discusses Oregon's "landmark legislation for 100% emissions-free electricity by 2040."
- States that there is increasing demand for clean energy in various sectors.
- Discusses potential for increased grid resiliency and sustainable jobs in coastal areas.

Makah Indian Tribe (BOEM-2023-0033-0716)

- Urges BOEM to halt the planning process completely until "BOEM completes the necessary scientific studies and analyses ... and conducts meaningful consent-based consultation with the Makah Tribe and all other affected Tribes."
 - Further urges BOEM to complete a cumulative impacts analysis for the resources and fisheries of the West Coast ecosystem.
- References the National Marine Fisheries Service's (NMFS) letter regarding research questions for offshore wind energy development and recommends that science agencies, in tandem with Tribal Governments and BOEM, lead this research.
 - Outlines the research questions and studies, including habitat mapping, upwelling, comprehensive marine spatial planning/modeling, integrated baseline data and region-wide monitoring, and analysis of regional and national impacts.
- Expresses support for the PFMC 2023 letter discussing additional requests that must be addressed prior to offshore wind energy processes including the use of spatial planning tools, production of model data layers, representation of temporal variability, and identification of potentially impacted larval nurseries.
- Asserts that a PEIS for the entire West Coast is needed.
- Urges BOEM to engage the Makah Tribe in "meaningful, consent-based consultation."

Masamitsu, J. Local 562 (BOEM-2023-0033-0238 [Form Letter Master])

- Expresses general support for offshore wind jobs.
- Urges BOEM to impose unionization standards and project labor agreements during construction phases.

Maude, C. (BOEM-2023-0033-0704)

- Argues for general protections of avian species off of Oregon's coast.

MCAT (BOEM-2023-0033-0957)

- Expresses general support while urging BOEM to ensure that Oregon's state stakeholders are given meaningful opportunities to share their priorities.

Meisenhelter, D. (BOEM-2023-0033-0478)

- Expresses support for alternative energy developments but emphasizes need to ensure no negative impacts on marine life occur.
- Urges BOEM to conduct a West Coast-wide PEIS or an equivalent cumulative impacts evaluation before finalizing the siting process.
- Gives the following recommendations:

- In the Draft Coos WEA: Recommends the removal of the protected leatherback turtle species exclusion area from the northwestern portion.
- In the Draft Brookings WEA: Advocates for removing the Blue/Humpback foraging exclusion area to protect coral, short-tailed Albatross, and Leach's Storm Petrel nesting

Midwater Trawlers (BOEM-2023-0033-0722)

- Recommends complete restart of the planning process in collaboration with stakeholders.
- Calls for the rescinding of current Draft WEAs and suitability modeling of the entire Oregon coast, including waters deeper than 1,300 meters.
- Raises concerns about perceived disregard of opposition from rural communities along the Oregon coast.
- Criticizes the weighting of data in the modeling process, accusing BOEM of manipulating outcomes to downplay the impact on highly impacted fisheries.
- Advocates for a transparent and stakeholder-driven process.

Moffitt, C. (BOEM-2023-0033-0657)

- Argues BOEM's leasing process would violate NEPA protocols, reasoning that BOEM has not delivered a thorough environmental analysis.
- Expresses worries about potential impacts to coastal estuaries.
- Raises concerns about high development costs being passed on to consumers.

National Wildlife Federation, National Audubon Society, Mass Audubon (BOEM-2023-0033-0694)

- Supports BOEM use of spatial modeling and publishing the Draft WEAs for public comment but still recommend BOEM extend public comment period 30 days, not just 15 days.
- Argues that site selection is crucial for responsible offshore wind development, following the mitigation hierarchy of avoid, minimize, and mitigate impacts.
- Argues that avoidance of all potential impacts in the Oregon OCS is challenging due to significant conservation conflicts in both proposed WEAs.
- Asserts that early NEPA review and a PEIS would enhance the process by identifying optimal areas with fewer conflicts and engaging impacted communities.
- Says that the Draft WEA Report incorporates only five species into the NMFS Protected Species Combined Data Layer, compared to 30 in the Gulf of Mexico and 31 in the Central Atlantic.
- Suggests that "Time limitations" were cited as a reason for excluding other protected species from the analysis and takes issues with this rationale.
- States that swift timelines to address the climate crisis are essential, but excluding robust environmental analyses and stakeholder engagement could hinder responsible offshore wind development in Oregon.
- Asserts that BOEM should concurrently develop strong impact minimization and mitigation measures, along with baseline monitoring studies for responsible development off the Oregon Coast.
- Contends that available data and all protected species should be considered, not just the five modeled in the Draft WEA Report's NMFS Protected Species Layer.
- Argues that BOEM must prioritize meaningful engagement with Oregon's stakeholders, Indigenous Peoples, and Tribes in the offshore wind development process.
 - Discusses how improved stakeholder engagement is not only necessary for the process, but critical for successful decision-making and achieving clean energy goals.
 - Argues that addressing stakeholder alienation is crucial to mitigate risks associated with misinformation and distrust in government processes.
 - States that all public meetings should receive equal opportunities for oral public comment to ensure equity in engagement, recognizing that each community is unique.

- Encourages stakeholder engagement for data review and selection in the offshore wind development process.
 - States that it is unclear how BOEM selected ocean users to weigh in on datasets and determine which data to incorporate into the Draft WEA Report.
- Argues that BOEM should consider updated data on Biologically Important Areas II for the West Coast when finalizing the Draft WEAs and provides several recommendations.
- Argues that BOEM's site identification process lacks consideration of gear-specific wind planning and provides several suggestions.
- Raises concerns that BOEM's process defers evaluation of certain factors, like transmission impacts, to later stages in the permitting process, such as during the NEPA review.

Nature Conservancy (BOEM-2023-0033-0681)

- Argues that BOEM should address insufficiencies in the spatial suitability modeling report, such as the limited species in the NMFS Protected Species Combined Data Layer for the Oregon WEAs compared to the Gulf of Mexico, updates to the LCOE data layer, transmission planning, conducting a PEIS, onshoring and transmission considerations, and additional data for more species, habitats, fisheries, estuaries and ocean uses.
- Urges BOEM to carefully consider and address comments provided by Portland Audubon, American Bird Conservancy, Oceana, Surfrider Foundation, et al.
- Argues that BOEM should actively engage with Oregon stakeholders, ocean users, the Pacific Fisheries Management Council, and elected officials.
- States Tribal consultation is crucial and BOEM should prioritize appropriate and meaningful consultation.
- Suggests that if development proceeds, BOEM should prioritize local and tribal benefits, ensuring that coastal communities and Tribes define what these benefits should entail.
- States a precautionary approach should be taken to consider the full scope of impacts to the California Current Large Marine Ecosystem, particularly as BOEM explores turbines at unprecedented depths and scales.
- Urges BOEM to employ a full mitigation hierarchy.
- Urges BOEM to develop a clear plan for adaptive management.

New, B. (BOEM-2023-0033-0447)

- Advocates for a just energy transition and prioritize the energy needs of historically marginalized communities and create benefits for Oregon communities.
- Expresses general support for turbine construction, reasoning that wind energy is a viable alternative to GHG-emitting energy sources.

Nikolai Anderson (BOEM-2023-0033-0137) [Form Letter Master]

- Advocates for PLAs and protections for skilled carpenters involved in any future construction.

NOAA NMFS and IOOS (BOEM-2023-0033-0508)

- References the NMFS 2023 Technical Assistance document.
- Recommends that BOEM consider the comments provided in June 2022 during the Call Areas stage.
- Asks BOEM to consider the comments provided by NOAA's U.S. Integrated Ocean Observing System (IOOS) Office's Surface Currents Program in the June 2022 NOAA letter, especially the need to mitigate impacts that may occur to oceanographic high-frequency radars.
- Recommends avoidance through siting as an appropriate mitigation strategy for endangered species, deep sea corals, methane seeps and associated carbonate deposits, habitat areas of concern (HAPC), and NMFS fixed survey stations and transects.

- Expresses concern about the uncertainty or lack of known strategies to mitigate impacts.
- Recommends that BOEM engage subject-matter experts more frequently to “discuss consistency of scoring” with regard to the suitability model.
- Suggests incorporation of ecosystem-based considerations and future climate scenarios in the spatial suitability modeling approach.
- Recommends that OSW development avoid overlap with key biologically important areas (BIAs) to mitigate impacts to marine mammals.
- Urges BOEM to work with the National Marine Fisheries Service (NMFS) to mitigate risks posed by cables to gray whales.
- Discusses concerns about overlap between the Coos Bay Call Area and leatherback sea turtle critical habitat; recommends Heceta Bank slope be avoided.
- States monitoring pinniped populations would be important to evaluating the impacts of WEA development.
- Recommends that BOEM include the sunflower sea star as part of its evaluation and planning processes.
- Suggests burying cables at a depth appropriate to mitigate EMF effects and expresses concern about insufficiently buried/unburied cables conflicting with “trawl and other bottom-contact gear.”
 - Recommends discussing the minimum depth for cable burial with West Coast fishing operators.
- Expresses concern about any cables through Heceta Bank.
- Recommends implementing at least a 500-meter buffer between EFHCAs, rocky reef HAPCs, deep sea corals, methane seeps, and carbonate deposits and OSW activities or infrastructure.
- Recommends that BOEM excludes “aliquots with the highest habitat values” in Table 1 and Figures 9 and 10 of the comment.
- Recommends conducting detailed assessments to the scale of individual States, IO-PAC port-complexes, and ports to determine OSW socioeconomic impacts on fisheries and fishing communities.
- Recommends continuous engagement of stakeholders from Tribal nations and commercial and recreational fisheries.
- Urges consideration of OSW development in the Draft WEAs in relation to international fisheries treaties.
- Requests that BOEM consider a combination of two strategies to avoid or mitigate impacts to NMFS’ surveys in its siting decisions.
- Requests that “the corridor at the southernmost end of WEA B (Figure 12) be removed from WEA B because that contains fixed sampling stations critical for long term surveys (Figures 14 and 15).
- States that continuity of the surveys could help address questions or concerns about the OSW impacts posed by Tribal nations.
- Requests that BOEM’s Environmental Assessment and its Proposed Sale Notice describe survey impacts and express concern about impacts to NOAA scientific surveys.
- Asserts that “the most important of the considerations outlined above for minimizing regional impacts in the future design of WEAs is the provision of cross-current sampling corridors every 10 nm of latitude.”

NewSun Energy (BOEM-2023-0033-0707)

- Expresses support and urges BOEM to move forward.
- Cautions that delaying offshore wind development could pose risks to the success of decarbonization processes.

- Cites NREL and BOEM reports to state that offshore wind buildout could increase jobs and State gross domestic product and contribute to grid resiliency.

OCEAN Winds (BOEM-2023-0033-0604)

- References a recent auction in California asserting the potential for workforce training, supply chain development, and Community Benefit Agreements, providing additional community benefits beyond job creation.
- Asserts urgent need to address climate-related changes affecting the ocean and believes that offshore wind energy can play a crucial role in stabilizing the climate while meeting Oregon's clean energy goals.

Olmstead, D. (BOEM-2023-0033-0301)

- Expresses opposition to the Brookings WEA due to concerns about impacts to viewshed, tourism, fishing and avian species.
- Expresses concern about the power of storms off the Oregon coast, suggesting that this aspect may not have been adequately considered.

Oregon AFL-CIO (BOEM-2023-0033-0619)

- Urges BOEM to:
 - Require project labor agreement (PLA) covering any construction;
 - Require developers contribute to local domestic floating offshore wind supply chain;
 - Support needs of protecting natural resources, commercial fishing, conservation, and local and Tribal interests.

Oregon Chapter of the Sierra Club (BOEM-2023-0033-0291) and (BOEM -2023-033-0710)

- Requests BOEM extend comment period by 30 days and include more robust public engagement.
- References similar requests submitted by the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians, Pacific Fisher Management Council, American Albacore Fishing Association, and Western Fishboat Owners Association and their rationale.
- Requests BOEM avoid, minimize, mitigate and monitor impacts during site assessment and project development phases in the future.
- Urges for greater intake of public input from communities of color, Tribes, and other marginalized groups that may be impacted by turbine construction.
- Reiterates the concerns raised by the CTLUSI.
- Describes several concerns with spatial modeling process, including data used and collection of it, evaluation and transparency.
- Request BOEM consider cumulative impacts earlier in the process.
 - Raises concerns that seabed habitats, retirement plans for decommissioning, migratory pathways of marine life, and the need for a National Academy of Science fisheries study have not been adequately addressed in the development process or in the Draft WEAs themselves.

Asserts that process and Draft WEAs do not align with the policy underlying the Biden Administration's Tribal Consultation Memorandum, which emphasizes meaningful consideration of information obtained from Tribes and striving for consensus on mutually desired outcomes.

Oregon Coast Alliance (BOEM-2023-0033-0498)

- Expresses concerns about timing of an EIS, and advocates for an EIS earlier in the process.
- Discusses the challenges in connecting the Oregon coast, particularly the south coast, to major power grids due to rugged terrain, severe weather, and the active Cascadia subduction zone.

- Suggests that there is an absence of a cumulative impacts assessment for wind energy in the area.
- Urges a comprehensive assessment considering factors like the impact on the California Current ecosystem, upwelling to regional marine habitats, and potential disruptions to Heceta Bank.
- Argues that the costs of offshore wind development could disproportionately affect local coastal communities in southern Oregon.
- Expresses concern about increasing pollution.
- Raises concerns about conflicts between turbines and the fishing industry.
- Encourages serious consideration of whether Oregon is suitable for wind energy given its lack of infrastructure and rugged nature.

Oregon Coast Energy Alliance (BOEM-2023-0033-0738)

- Discusses concerns about offshore wind's potential impacts on marine life and coastal communities and urges strategic placement of turbines.
- Discusses collaboration with coastal communities for mutual benefits and other initiatives.
- Commends BOEM's leasing process.

Oregon Conservation Coalition (BOEM-2023-0597)

- Proposes adding mapping layers for sponge habitat, meso-eddies, and potential upwelling refugia to the NCCOS model before designating WEAs.
- Advocates for the inclusion of additional protected species in the Natural Resources submodel to ensure comprehensive consideration of wildlife conflicts and BOEM follow NMFS' recommendations.
- Asserts that cultural and community values have been overlooked in the planning matrix, emphasizing the need to consider factors such as viewsheds, marine life, commercial and recreational fishing, tourism, and scenic beauty of local state parks.
- Questions the projected Levelized Cost of Energy (LCOE) data for 2027 in the Wind submodel, suggesting that recent reports indicate higher LCOE values due to inflation.
- Urges BOEM to reconsider recommendations for sea turtles, whales, and corals, and to incorporate mapping and consideration for additional elements like sponge habitat and special upwelling areas.
- Acknowledges the consideration of "Protected Species" in the NCCOS-BOEM WEA Draft Siting Analysis but raises concerns about the inclusion of only 5 out of 26 known protected species.
- Commenter urges the following points concerning whales and marine mammals:
 - Proposed WEAs overlap critical habitats for endangered whales.
 - Coos Bay and Brookings areas are crucial for whale populations.
 - Western Pacific Gray Whales also migrate along the U.S. West Coast.
 - Offshore wind activities may pose risks to these species and habitats.
 - New assessments for Biologically Important Areas (BIAs) are pending.
 - Waiting for updated BIAs is recommended for informed decision-making.
 - Reconsider excluding southern part of Brookings WEA to reduce impacts on whales.
 - Strongly urge modification to protect Humpback Whales and Blue Whales
- Urges BOEM to add a habitat layer for sponge habitats.
- Raises concerns about locating the Brookings WEA in high-value areas for deep-sea coral and sponge ecosystems.
- Suggests the importance of deep-sea coral and sponge ecosystems for biodiversity and marine life.
- Argues BOEM should reduce areas known or likely to contain deep-sea coral and sponge ecosystems from the WEAs.

- States that BOEM should include detailed mapping and visual surveys before any construction and operation activities.
- Suggests adding meso-eddies in the spatial analysis for high-value areas.
- Requests ongoing modeling on turbine-array induced effects to upwelling.
- Raises concerns over research on the potential impacts of large wind farms on ocean circulation and upwelling.
- Urges protections for several avian species.
- Suggests more layering for the mapping of critical avian habitats.

Oregon Department of Energy (BOEM-2023-0033-0760)

- Encourages BOEM to engage Tribes, State and local agencies, stakeholders, and the public to address possible impacts, environmental assessments, and environmental impact statements.
- States that both of the identified Draft WEAs are “steps towards Oregon’s twin offshore wind policy goals” but more planning is needed.
- States that BOEM’s processes should be in alignment with regional power and transmission planning processes and be available in the 2030s, referencing Portland General Electric’s (PGE) 2023 Integrated Resource Plan and Bonneville Power Administration’s (BPA) 2022 Transmission Plan.
- Provides key points from a prior 2022 “Call Area” comment letter.
- Expresses concern that the overall timeline could be delayed in an effort to include deeper waters as part of the “identified Draft WEAs.”
- Urges BOEM to consider both the costs and values of FOSW, including the costs of not advancing FOSW projects.

Oregon Department of Fish and Wildlife (BOEM-2023-0033-0759)

- Urges BOEM to take the policies and resource protections included in the Territorial Sea Plan (TSP), the Geographic Location Description, the Oregon Nearshore Strategy (ONS), and the Oregon Conservation Strategy (OCS) into consideration.
- Requests that BOEM resolve the recommended issues during the Area Identification and prior to the finalization of the WEAs.
- Provides several overall recommendations, including:
 - Final WEAs should only be in areas with minimal risks, feasible cable routes and landing sites, and sufficient interconnection capacity if BOEM moves forward with siting.
 - BOEM should consider the reevaluation of areas north of the Draft WEAs and with a coastwide depth of more than 1300 meters.
 - Prior to establishing Final WEAs, and in later planning stages, BOEM should provide additional information to supplement the data used to date.
 - BOEM include a cumulative effects analysis during the siting assessment.
 - The identification of potential cable routes, landing sites, and related infrastructure should be included with the Final WEAs’ designation.
 - BOEM should “remove aliquots within Draft WEA A containing sensitive habitat and apply a minimum 500 m buffer around them, conduct analyses of available seafloor data and the Heceta slide region, evaluate transmission routes and cable landing locations, assess consequences to leatherback sea turtles and other protected species, and consider impacts to important fisheries.”
 - BOEM should “remove aliquots within Draft WEA B containing sensitive habitat and apply a minimum 500 m buffer around them, avoid sensitive habitats shoreward and onshore when evaluating transmission routes and cable landing locations, avoid siting OSW development in important whale foraging areas, consider impacts to important fisheries, and preserve the southernmost areas used by NMFS scientific surveys.”

- Provides numerous additional recommendations related to habitat and ecological processes, fish and wildlife species and fisheries.:
- Discusses concerns related to:
 - Impact to upwelling, circulation, and productivity;
 - Proximity of Draft WEA A to Heceta Bank;
 - Characterization of risks posed to the short-tailed albatross as included in the NCCOS Analysis;
 - Potential consequences of OSW development on species, habitats, and/or fisheries; and
 - Potential impacts of OSW facilities to “alter regional eddy formations or other currents” on which eggs and larvae depend, among others.
- Discusses intent to identify best available data and critical analysis needs to conduct responsible siting that avoids or minimizes effects to ecosystem resources and fisheries activities.

Oregon Department of Land Conservation and Development (BOEM-2023-0033-0757)

- References prior comments submitted as part of the 2022 Call Areas comment opportunity.
- Discusses various concerns, including economic and socio-cultural impacts on coastal communities, risks of harm from “floating OSW technology,” cables, and landing sites, impacts to the coastal viewsheds and adverse impacts to Oregon’s “oceanography and atmospheric conditions, among others.
- Discusses primary concerns of the Oregon Coastal Management Program (OCMP) regarding uses and resources associated with the marine ecosystem, commercial and recreational species, habitat areas, and navigation, recreation, or aesthetic resources.
 - References the list of marine resources and uses documented by the Geographic Location Description (GLD)
- Recommends that BOEM “move forward on a timeline that allows for the full consideration of the issues brought forward by the Department, Tribes, and Oregon stakeholders.”

Oregon Department of State Lands (BOEM-2023-0033-0758)

- Requests the integration of spatial planning and requirements before commercial leasing areas are approved.
- Supports developing pilot demonstration projects prior to large scale projects.
- Expresses support for the phasing of commercial projects development.
- References and discusses the Oregon Territorial Sea Plan, especially Part 4, and the 2022 ODOE report “Floating Offshore Winds: Benefits and Challenges for Oregon.”
- Recommends that BOEM continue its modeling of climate conditions so as to mitigate impacts and potential risks of offshore wind energy development.
- Urges BOEM to proceed with a timeline that allows for the consideration of the issues presented in the comment.

Oregon Environmental Council (BOEM-2023-0033-0452)

- Argues the importance of Tribal consultation and climate change.
- References the 2022 ODOE report “Floating Offshore Winds: Benefits and Challenges for Oregon.”
- Discusses environmental impacts, calling for a comprehensive National Environmental Policy Act (NEPA) process and mitigation measures.
- Advocates for strong labor standards ensuring worker safety, fair wages, and prioritized hiring of underrepresented groups.
- Expresses support for continued exploration of offshore wind, considering potential impacts and involving local and impacted communities in determining benefits.

Oregon Fisherman’s Cable Committee, Inc. (BOEM-2023-0033-0618)

- Discusses how offshore wind in the Oregon could result in negative impacts to fishing industry, including compression of fishing grounds.
- Provides recommendations for removal of several aliquots within the WEAs due to fishing and submarine cables.

Encourage BOEM to require lessees to follow International Submarine Cable Committee Recommendation 13 and consider water depths for setback, including a one nautical mile setback from subsea cable routes.

Oregon Governor Tina Kotek (BOEM-2023-0033-0762)

- Expresses appreciation for the extension of the public comment period.
- States that Oregon is coordinating among the six State agencies that play key regulatory and policy roles regarding offshore renewable energy development.
- States referenced attachments for comments submitted by Business Oregon, the Department of Land Conservation and Development, the Department of State Lands, Oregon Department of Fish and Wildlife, Oregon Department of Energy, and Oregon Parks and Recreation Department.
- Commits to continuing to work with BOEM in the future.

Oregon Natural Resource Industries (ONRI) (BOEM-2023-0033-0224)

- Expresses opposition to offshore wind and concerns about impacts to fishing, seafood processing, security, marine ecosystems and habitat, businesses, viewsheds and lives of coastal residents.
- Expresses concern about unintended consequences stemming from the new technology in the proposed wind farms off the Oregon Coast, as well as drilling to the continental North American Plate; correlation between wind farms and drought conditions and the impact on the coastal climate and environment; and cost burden to Oregon ratepayers and taxpayers, among other topics.
- Asserts that the benefits of offshore wind energy are outweighed by its higher costs and harms.
- Asserts that the wind turbines will adversely impact coastal communities, result in tax increases, and endanger cultural, environmental, and socioeconomic well-being.

Oregon NGOs (BOEM-2023-0033-0340)

- Requests at least a 30-day extension of the comment period.
- References the extension requests submitted by the Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians, the Pacific Fishery Management Council, and the West Coast Ocean Alliance.

Oregon Parks and Recreation Department (BOEM-2023-0033-0761)

- Discusses importance of Oregon’s coastal recreation and scenic resources, stating that more visualizations and analysis – including at night, and from “key viewpoints” – should be conducted.
 - Adds that analysis should be inclusive of “a review of the standards in the TSP” to identify possible inconsistencies.
 - Consideration of dark skies at night contributing to scenic quality should be addressed by BOEM.
- Alleges that the planning process has not adequately considered the impact of power transmission lines and other infrastructure on various resources.
 - Adds that addressing cabling and onshore connectivity in later development stages “is highly problematic.”
- Recommends “on-going meaningful consultation” with Tribes that would be impacted so as to identify and protect Traditional Cultural Properties and Landscapes.

- Urges BOEM to prioritize areas that are “as far offshore as possible” and consider options outside of the Draft WEAs.

Oregon Solar + Storage (BOEM-2023-0033-0687)

- Links offshore wind generation profile's complementarity to solar generation, especially during peak demand in key winter months.
- Asserts the significance of offshore wind's contribution during Pacific Northwest power demand peaks when solar resources may not generate at their full potential.
- Discusses the benefits of counterflow transmission, expanding renewable energy delivery from generating sources east of the Cascade Mountain range to major load centers on the west side.
- Urges BOEM to move forward in a timely manner to avoid significant delays.
- Addresses filings made years ago through Bonneville Power Administration's system and the commencement of multiyear/decade interconnection and transmission review processes.
- Cites studies showing that approximately 1,000 MW of offshore resources could be interconnected to the grid by 2030, emphasizing the need for timely BOEM action.
- Calls for clarity on the viability and progress of offshore wind development for effective planning by regulators, buyers, and the broader development and investment community.

Oregon State Building and Construction Trades Council (BOEM-2023-0033-0609)

- Urges BOEM to require and enforce any future PLAs.
- States PLAs will ensure efficiency, local hire, and timely execution while promoting good paying careers for women, rural workers, military veterans, tribal communities, and workers of color wanting a career in the skilled trades.
- Expresses support for the development of all offshore wind energy proposals with the inclusion of a PLA as part of the leasing stipulations.

Oregon Trawl Commission (BOEM-2023-0033-0745)

- Recommends that BOEM cancel the Draft WEAs, rescind the Oregon Call Areas, and re-initiate the siting process using the spatial suitability tool developed by the NOAA’s National Centers for Coastal Ocean Science (NCCOS).
 - Cites “BOEM’s failure to identify areas for potential offshore wind energy” with the least opportunity for conflict posed to fishing activities, habitats, and protected species.
 - Includes concerns about potential impacts to the California Current Ecosystem.
 - Expresses concerns about BOEM not conducting a PEIS on offshore wind in Oregon.
- Expresses support for comments submitted by the Pacific Fisheries Management Council (PFMC), Responsible Offshore Development Alliance (RODA).
- States that BOEM’s use of the NCCOS tool “raises some serious questions” and asserts that BOEM “failed to incorporate any of the ecosystem layers” among other concerns; cites only 30 data layers selected for analysis out of 400 available.
- Urges BOEM to incorporate the Pacific Fishing Effort Mapping (PacFEM) project in its analysis.
- Discusses challenges impacting the OSW industry, including supply chain issues and raw material shortages, among others.
- Raises concerns about downstream economic effects to fishing industry.
- Asserts that the Oregon Call Areas “were not identified using a spatial suitability model” and urges BOEM to “utilize all available relevant data.”

OW North America LLC (BOEM-2023-0033-0649)

- Discusses the importance of transitioning to a less carbon-intensive energy system, asserting the crucial role of the Pacific Coast, particularly Oregon, in this renewable energy transition.

- Supports the proposed WEAs, emphasizing the need for proactive collaboration among stakeholders to address potential adverse impacts on ocean users.
- Discusses importance of available acreage for offshore wind leases in the future.
- Discusses national security constraints particularly restrictions by the Department of Defense and USCG, are noted as potential barriers to reaching decarbonization targets.
- Recommends forming a task force with Department of Transportation to facilitate export cable routes along Federal highways, addressing cost and fire hazard concerns on the West Coast.

Pacific Ocean Energy Trust (BOEM-2023-0033-0690)

- States that utilities in the Pacific Northwest currently have sufficient resources, but new emissions-free electricity laws are driving a need for additional non-emitting generation resources over the next 15-20 years.
- Argues that the region has not yet strongly indicated preferences for the types and locations of renewable energy sources to meet future needs, potentially leading to misconceptions about the demand for resources like offshore wind.
- Says both Oregon and Washington face the significant task of reimagining the regional grid structure and operation to accommodate these changes.
- Suggests that regional utilities are expected to make substantial investments in large new projects, with specific details awaited by industry observers.
- Asserts that the region's approach to preferred renewable energy sources is shifting, with initiatives like the Oregon energy strategy process and Washington Governor Inslee's support for an offshore wind supply chain initiative.
- Suggests that establishing domestic supply chain for floating offshore wind requires engaging expertise across various sectors including fabrication, construction, engineering, and operations.
- Asserts that there will be ample opportunities for new businesses to participate, and the approach should be tailored to the specific needs and aspirations of each community.

Pacific Fishery Management Council (BOEM-2023-0033-0113)

- Requests a 30-day extension of the comment period.
- Raises concerns that Tribal government consultation has been inadequate, particularly with regards to the potential for OSW development to displace ceremonial grounds and Native Americans' fisheries.
 - Discusses cultural significance of the waters near and within the proposed call sites.
- Expresses general support for NCCOS analyses and inclusion in the Draft Report.
 - Advocates for expansion of suitability model coverage beyond the acreage of the proposed Call Areas.
 - Expresses concerns that sub-models related to wildlife do not account for OSW impacts on larval and juvenile fish.
 - Asserts that BOEM has taken premature action on the 2023 Marine Planning Committee (MPC) policies related to fisheries, reasoning the agency has not adequately considered OSW impacts on fish populations.
 - Argues better tools, such as the Pacific Fishing Effort Mapping (PacFEM) should be considered for use when conducting fishery studies.
 - Argues that there is inadequate data layering in spatial model, evidenced by "Appendix A of the Draft Report" which provides a list of only 10 datasets where BOEM states there are 40.
 - Questions validity and limiting factors of spatial analysis, arguing that the following factors should have been included:
 - Adequate evaluation of fisheries;

- Coastal and Marine Ecological Classification Standard (CMECS) substrate attributes;
 - Mesoscale eddies data layering;
 - Future shifts in habitat and species distribution; and
 - Oceanographic features.
- Asserts commercial and recreational fishing sub-model analysis on costs only considers ex-vessel revenues.
- Raises concerns over the validity of the siting decisions in context of the critical habitat sub model.
 - Advocates for stricter adherence to NMFS recommendations regarding ESA-listed species.
- Raises concerns over fishery modeling, analysis, and data layering
 - Urges BOEM to impose lease restrictions on areas where Highly Migratory Species (HMS) are known to frequent.
 - Expresses concerns that Coastal Pelagic Species (CPS) are highly active near Oregon shores; requests further exclusion areas for such species.
 - Advocates for aliquots in Coos Bay and Brookings, particularly due to salmon runs.
 - Identifies the following habitats and areas of concern which are under the protection of the Magnuson-Stevens Fishery Conservation and Management Act:
 - All hard substrate/rocky reef nearshore;
 - Observed deep-water coral and biogenic habitats at NOAA research sites;
 - “High robust” habitat suitability areas for coral taxa;
 - Methane seep bubble plume sites;
 - Carbonate clasts;
 - Areas with canopy kelp; and;
 - Stonewall Bank, Heceta Bank, Deepwater off Coos Bay, Arago Reef, Bandon High Spot, Rogue Canyon and River Reef, and the Brush Patch.
 - Suggests measures that correspond to the following topics of concern related to fisheries:
 - Remove leasing permissions in areas off Oregon’s southern and California’s northern coasts where albacore fisheries are located.
 - Conduct more analysis of salmon fisheries and engage commercial representatives that rely on such fisheries.
 - Advocates for preservation of 400-fathom exclusion zone, in areas where groundfish fishing occurs.
 - North-south line of Brookings Call Area has significant populations of groundfish and are sites where fishermen deploy pots and cable traps.
 - States these areas are also important bottom trawl sites.
 - Ensure “At-sea mothership” vessels, which are important to groundfish fishing, are not disrupted from business.
 - Ensure greater protection for groundfish spawning.

Pacific Seabird Group (BOEM-2023-0033-0702)

- Advocates for greater protection of various species of birds off Oregon’s coasts, especially petrels and Short-tailed Albatross.
 - States that Oregon hosts the largest breeding concentration of Leach’s Storm-Petrel in the eastern Pacific, with 95% of breeding birds found on islands south of Cape Blanco.

- Argues that densities of Leach’s Storm-Petrels off the Oregon Coast indicate highest spring and summer densities to the west of the draft Brookings Wind Energy Area (WEA) where they are known to forage.
 - States species are susceptible to collisions and displacement due to its nocturnal habits.
 - Recommends that BOEM conduct additional at-sea observations and individual tracking to help avoid, minimize, and mitigate potential impacts to this species, particularly during the breeding season.
- References the Leirness et al. (2021) study, arguing that spatial suitability analysis has limitations that need to be addressed.
 - States that uneven geographic and temporal survey effort affected the modeling's uncertainty, and additional dedicated year-round at-sea surveys following standardized protocols are needed to fill information gaps and improve model predictions.
- Asserts more information is needed for species in the Northern California Current with high collision and displacement vulnerability rankings and high levels of uncertainty related to those rankings, especially migratory species flying at higher altitudes, which adds to their collision risk.
- Recommends filling data gaps causing uncertainty in the suitability analysis using direct visual observations, radar studies focused on migratory movements, and individual tracking data to more accurately predict the impacts of offshore wind energy projects and develop mitigation methods.
- Recommends that BOEM plan for standardized before-after control impact or before-after gradient studies to detect changes in seabird distribution and abundance at the Wind Energy Areas (WEAs) or eventual lease sites.
- Urges more robust monitoring at the ecosystem scale by conducting region-wide surveys before, during, and after construction, requiring developers to follow standards monitoring protocols, and mandating data sharing among projects.

Palomares, F. (BOEM-2023-0033-0548)

- Expresses general opposition to offshore wind development on the southern Oregon coast.
- Suggests turbines may cause potential harm to ocean life and birds and contributing to global warming with microclimate changes.
- Raises concerns about the industrialization resulting from the infrastructure required for wind farms and potential creation of electronic waste (e-waste).
- Questions the reliability of the technology for ocean wind farms and expresses apprehension about experimenting on Oregon’s coastline.

Phillips, C. (BOEM-2023-0033-0545)

- Questions whether offshore wind energy is necessary for Oregon and will further the government’s goal of reaching 40% solar-based energy by 2035.
- Raises concerns about potential impacts to seabirds and property values across Oregon’s coastal communities, as well as impacts to local beauty.

P. Leighton (BOEM-2023-0033-0309)

- Expressed concern with offshore wind energy, reasoning it would impact the livelihood of the local population by affecting the fishing industry, tourism, and urban development.
- Requested BOEM continue research and engagement with Curry County communities.

Port of Umpqua (BOEM-2023-0033-0117)

- Expresses opposition due to potential impacts on commercial fishing.

Prescient Transmission Systems (BOEM-2023-0033-0028)

- Recommends distributing smaller, offshore wind development along the entire Oregonian coast rather than constructing a couple of centralized wind farms in southern Oregon.
- States that significant increases in energy production on coast would create energy congestion for the existing grid.
- Requests a meeting with BOEM to discuss benefits of distributed windfarms and share a presentation.

Prescott, F. (BOEM-2023-0033-0573)

- Expresses general opposition to offshore wind energy due to potential risks and impacts.
- Urges BOEM to withhold leasing until completion of additional environmental impact analyses.

Protect our Winters (BOEM-2023-0033-0519)

- States offshore wind energy planning in Oregon is important for climate future and provides an opportunity to make substantial progress in energy transition and aid in further protecting outdoor recreation, which is under threat due to climate change.
- States Oregon's outdoor recreation economy adds up to \$15 billion in spending annually and accounts for over 200,000 part-time and full-time jobs and contributes significantly to local jobs.
- Improve collaborating with Indigenous tribes to, “honor their heritage, valuing their insights, and ensuring the wind farms are symbols of unity and not discord.”
- Recommends thorough spatial modeling and marine traffic analyses.
- Advocates for transparent dialogue and engaging in public workshops.
- Suggests exploring ways to minimize the maritime footprint of wind farms will alleviate many environmental and fishing industry concerns.

Protect US Fishermen (BOEM-2023-0033-0283)

- Requests a 30-day extension to the comment period.
- Urges BOEM to return to Coos Bay, Newport, and Astoria to hold in-person public hearings for community members and to use a court recorder to capture formal public comments.

Radtke, H. (BOEM-2023-0033-0542)

- Expresses disappointment over the absence of specific economic analysis information related to commercial and recreational fishing in the information provided by BOEM's Oregon WEA Spatial Modeling Team.
- Criticizes BOEM's Maryland offshore wind development DEIS socioeconomic impact measurement as being only at the first level, emphasizing the necessity of more in-depth analysis, including downstream effects and comparisons with other impacted industries.
- Advocates for a more comprehensive economic modeling approach for all alternatives that might be included in the EA, emphasizing the importance of measuring impacts beyond the first level.
- Asserts that stakeholders deserve a higher level of analysis for better understanding of economic impacts, with a focus on community-level primary and secondary impacts, including multiplier effects.

R. D. (BOEM-2023-0033-0729)

- Expresses opposition, reasoning that the proposed project would threaten:
 - Human health;
 - Marine ecosystems;
 - The fishing industry;
 - Financial wellness of taxpayers and energy ratepayers;
 - The tourism industry;

- The national security of the United States; and
- Other industries and communities.
- Expresses opposition, reasoning that it would infringe on the public’s right to:
 - Scenic view protection of shore;
 - Scenic and recreational use of ocean shore; and
 - Navigation, fishery, and recreation;
 - And includes references to applicable Oregon statutes.
- States that the project may not qualify for transmission cable permits, per ORS 390.715.
- Questions need for additional renewable energy, citing Oregon’s use of hydroelectricity.

Renewable Hydrogen Alliance (BOEM-2023-0033-0396)

- Cites the 2022 Oregon Department of Energy (ODOE) report “Floating Offshore Wind: Benefits & Challenges for Oregon” to discuss the benefits of renewable hydrogen in siting.
- States renewable energy generation is key for Oregon to meet its decarbonization goals.
 - Renewable energy generation could mitigate the effects of climate change on disadvantaged communities;
 - OSW, in tandem with other decarbonization tools, could provide “resilience, good jobs, a healthy environment and economic growth;” and
 - OSW development could advance GHG emission reductions and Oregon’s shift to a clean energy economy.

Renewable Northwest (BOEM-2023-0033-0695)

- Urges BOEM to consider the potential electricity generation capacity supported by the size of these areas, in line with Oregon's 3 GW by 2030 planning goal.
- Asserts the need to find a balance between sufficient area for development and minimizing impacts on existing ecosystems and uses.
- States that it is important to keep the sizes of the areas sufficient to support the 3 GW planning goal, taking into account both the acreage of the WEA and the strength of the wind resource in those areas.
- Argues that public engagement, Tribal Consultation, and stakeholder inputs are vital aspects of the BOEM process. RNW appreciates the additional steps and tools that have been added to the OSW leasing process, including the Draft WEA step and the NCCOS tool, which provide more opportunities for engagement and data inclusion.
 - While acknowledging progress made on public engagement, states there is still room for improvement in including Tribal Consultation and stakeholder voices.
 - Argues that a more inclusive process doesn't have to be a lengthier one, and a lengthy process could hinder Oregon's efforts to achieve state clean energy policy.
 - Urges the continuation of the leasing process as planned, to allow the state to fully consider the impacts and benefits of OSW as a potential renewable energy resource.
 - Expresses support for adequate consideration of input from State agencies.
- Discusses importance of comporting proposal with preexisting State energy plans.
 - States that House Bill 2021 mandates 100% non-emitting electricity by 2040, with intermediate benchmarks of 80% by 2030 and 90% by 2035.
 - States that Oregon’s largest utilities, Pacific Gas and Electric (PGE) PacifiCorp, are in the midst of their integrated resource planning process (IRP), which now includes mandated Clean Energy Plans (CEP).
 - Says that both utilities (mentioned in bullet above) are exploring new resources for post-2030 energy generation.

Repsol Renewables North America, Inc. (BOEM-2023-0033-0647)

- Urges BOEM to increase the size of Draft WEA-A, reasoning the area is not sufficient to meet economies of scale.
 - States that BOEM should analyze whether the “whole area” is not compatible with offshore wind development.
- Recommends that Draft WEA-B be modified to have “a more regular shape.”
- Recommends that Draft WEA-B be divided in two, restricting the capacity to 1 GW each.
- Recommends that BOEM avoid further reducing the sizes of the areas.

Responsible Offshore Development Alliance (BOEM-2023-0033-0136) and (BOEM-2023-0033-0699)

- Requests a 30-day extension of the comment period.
- States that a comment period extension is appropriate under the Administrative Procedure Act because:
 - The DWEAs and their associated materials are complex and “potentially precedent-setting,” and would impact fisheries and ocean ecosystems alike.
 - Stakeholders would have greater opportunity for public participation.
- Argues for cancellation of the of Draft WEAs, rescission of Call Areas, and restart of planning process utilizing the NCOOS spatial suitability model covering all areas off the Oregon coast greater than 12 miles offshore, including areas deeper than 1,300 meters, excluding offshore banks and seamounts and requiring an adequate buffer zone surrounding them.
- Supports the recommendation of the Pacific Fishery Management Council (PFMC) that BOEM not take any further actions on OSW energy planning off Oregon until the concerns identified by stakeholders, fishery managers, and BOEM’s sister agencies are addressed and included in the process, effectively continuing the pause requested by the Governor of Oregon.
- Requests holistic approach for offshore wind development that avoids impacts to the fishing industry.
- Expressed several concerns with BOEM’s use of the spatial suitability model, including how scores were determined, threshold uses, and uncertainty about how BOEM used data layers; urged transparency why some data were used and other data sets were not.
- Request more clarity and opportunities for public comment.
- Asserts that delaying leasing would allow further research and opportunities to deconflict area identification without impacting overall development timelines.
- Urges BOEM to clarify its specific fisheries goals, and states that there is reason to believe that many of these goals are mutual.
- Requested BOEM work more closely with USCG and maritime community, including fishermen, to clarify roles and responsibilities and ensure topics are scientifically evaluated in advance of any leasing decisions.

R. Gable (BOEM-2023-0033-0339)

- States there is no economic advantage for the region, that the turbines would be costly to install and maintain, and that it would likely harm the environment and wildlife.
- Expresses concern that there was no cumulative impact analysis on how large wind energy arrays would impact wildlife.

Rogue Climate (BOEM-2023-0033-0226 and BOEM-2023-0033-0725)

- Requests at least a 30-day extension of the comment period.
- Asserts that developing floating offshore wind energy should involve consultation with Tribal governments, engagement with stakeholders, and consideration of estuarine ecosystem impacts.

- Expresses support for the Tribal governments and other stakeholders who asked for an extension.
- Requests an in-depth analysis for siting and planning, including potential impacts to Coos Bay estuary.
- Recommends that BOEM utilizes the Principles for a Just Transition in Offshore Wind Energy and the Rogue Climate Community Conversations Report as a foundation for community engagement and involvement.
- Suggests that if floating offshore wind energy cannot meet the outlined steps and criteria, BOEM should reconsider moving forward in the leasing process.
- Provides report on organization’s series of community conversations on offshore wind for BOEM’s consideration.

R. Taylor (BOEM-2023-0033-0626)

- Expresses opposition because of the potential impacts on marine mammals, salmonids, whales (because of the impact on plankton feeders), and endangered albatross species.
- Questions what actions BOEM has taken to protect the migrating patterns of marine mammals and salmonids, and the safety of Short-Tailed Albatross.
- Expresses concern over potential wind farm interference with ship radar and navigation.

RWE Offshore Wind Holdings, LLC (BOEM-2023-0033-0697)

- Expresses support for BOEM’s commitment to public input and urges BOEM to follow suit with regard to Final WEAs, the Proposed Sale Notice, and a Final Sale Notice.
- States that the NCCOS model “does not adequately consider the commercial viability of the areas for the offshore wind developers.”
 - Recommends that BOEM and NCCOS revisit amount of acreage available for development and potentially increase it.
- Recommends retaining the sea-space as part of the Final WEAs.
- Cites the 2022 ODOE report and the Integrated Resource Plans of Portland General Electric and PacificCorp to discuss benefits of offshore wind.

Safari Town Surf Shop (BOEM-2023-0033-0737)

- Expresses opposition to “wind turbines in our ocean,” citing concerns about the impact to the environment, marine life, and local businesses and economies.

Shelton, DQ (BOEM-2023-0033-0421)

- Raises concerns about potential impacts to viewsheds and whales, in addition to potential risks for placing wind turbines near the Cascadia Subduction Zone, citing seismic risks.
- Argues against the necessity of new power generation, citing the presence of renewable hydroelectric energy in the region.

Sheppard, H. (BOEM-2023-0033-0306)

- Expresses concern about the visual resource impacts and incompatible use with the development of the Brookings Draft Wind Energy Area.
- Argues the significance of Oregon State Scenic Areas, highlighting their wildlife, views, and grandeur.
- Raises concerns about the potential negative impacts on tourism, migratory species, fish, birds, and local economies from offshore energy development.
- Suggests that any reduction in tourism resulting from negative visuals will affect local revenue and a potential financial burden on local communities.

Southern Oregon Climate Action Now (BOEM-2023-0033-0236)

- Urges BOEM to move forward with the WEAs while also addressing concerns of local residents and communities.
- Discusses strategies for addressing opposition based on legitimate concern or on a “Not in My Backyard (NIMBY) or a don’t Build Anything New Anywhere Near Anyone (BANANA)” attitude.
- States that offshore wind could yield economic benefit to “an economically challenged region of the state.”

Southwest Mountain States Regional Council of Carpenters (BOEM-2023-0033-0129)

- Expresses support for moving forward with offshore development, citing diversification of the state’s green energy portfolio, economic opportunities, energy security, and reduction on fossil fuel.
- Urges BOEM to prioritize community benefits such as state-approved apprenticeship programs and local hires.

Southwest Mountain States Regional Council of Carpenters (BOEM-2023-0033-0257) [Form Letter Master]

- Expresses support for offshore wind energy development in Oregon.
- States that offshore wind energy projects could result in the creation of jobs in Coos Bay and Oregon.
- States that offshore wind energy projects could bolster economic growth and energy security while also supporting local businesses, reducing reliance on fossil fuels, and enhancing infrastructure.
- Urges decision-makers to provide the necessary support and resources for the development of wind energy projects, including the implementation of Project Labor Agreements.

S. Skinner (BOEM-2023-0033-0457)

- Expresses support, due to positive economic impacts on the region and providing renewable energy.
- States offshore wind is a preferrable route to economic development vs. a container ship facility.
- Requests more data be collected on the ocean.

Souza, S. (BOEM-2023-0033-0715)

- Urges BOEM to move forward with leasing.
- Urges BOEM not to further reduce the Draft WEAs any further.
- States integrating Oregon’s OSW into the transmission system would yield multiple benefits.

Stackhouse, J. (BOEM-2023-0033-0364)

- Expresses general support for offshore wind and including stakeholder engagement in BOEM’s process.
- States need for more clean energy.
- Recommends continuous involvement with local communities and impacted groups.

Stephens, M. (BOEM-2023-0033-0499)

- Expresses concern about insufficient consideration given to onshore aspects of wind energy installations.
- States potential impacts on areas with a high risk of wildfires and significant tourism value is of concern.

Surfrider Foundation (BOEM-2023-0033-0484)

- States the economic, ecological, cultural, and social significance of Oregon's nearshore marine environment, citing the National Ocean Economics Program's valuation of the ocean economy at \$3.1 billion annually, supporting over 43,000 jobs.
- Discusses potential impacts of offshore wind development on tourism, recreation, and fishing, which contribute significantly to the state's economy.
- Cites a 2015 survey indicating that "the coast" is highly valued by Oregonians, with over 80% reporting visits each year, representing over \$2.4 billion in expenditures from ocean recreation alone.
- Discusses specific resources in the Brookings Draft WEA that are of concern, including river, state parks, and recreation areas.
- Raises concerns about the potential impact on viewsheds at state parks, designated as "Territorial Sea Plan (TSP) Special Area Viewsheds" and "TSP Scenic Class viewsheds."
- Expresses concerns about potential impacts on critical habitats for threatened species.
- Urges BOEM to conduct a thorough analysis of shoreside impacts in Oregon and northern California, due to range of impacts on the coastal environment and existing human uses offshore wind development may have.
- Recommends an onshore impacts analysis, emphasizing the need for coordination with Oregon and California state agencies on related assessment and planning.
- Urges BOEM to collect updated data on nearshore and coastal recreation as part of the analysis of the Draft Oregon WEAs.
- Provides a comprehensive list of key nearshore and onshore resources that should be considered.
- Argues that Oregon Draft WEAs were identified without a West Coast Regional Ocean Plan process.
- Says that regional ocean planning under an RPB (Regional Planning Body) is crucial for improved public participation, scientific data, and inter-agency coordination.
- Recommends a PEIS to address cumulative impacts, including effects on beach and surf access, coastal habitats, and land use.
- Asserts the need for deeper engagement and consultation with Tribal Nations in the planning process.
- Suggests that Oregon has high conservation values, including state parks, the Oregon Islands National Wildlife Refuge, and critical habitat for seabirds and marine mammals.
- Urges BOEM to conduct analysis of shoreside impacts in Coos Bay, Oregon, and Humboldt County, California, due to onshoring requirements for offshore wind development.
- Calls for onshore landings and nearshore infrastructure impacts analysis, coordinating with state agencies.
- Urges modeling potential impacts to nearshore beaches and ocean recreation activities, considering atmospheric and oceanic circulation impacts in the wake of wind farms.

Taylor, B. (BOEM-2023-0033-0297)

- Raises concerns that BOEM has not sufficiently consider the impacts of turbine construction on the habitats of Humpback whales, Leatherback Sea turtles, Short Tailed albatross, and Leach's Storm Petrels and the risks of erosion, landslides, wildfire and earthquakes.
- Urges BOEM to assess the potential consequences of construction on tourism and State parks.

Ter Beek, M. (BOEM-2023-0033-0731)

- Expresses opposition due to Call Areas potentially leading to the introduction of an immature technology into a pristine area.
- Raises questions about unplanned maintenance events and transportation of parts to sea.

- Seeks clarification on the management, accountability, and economic development aspects of offshore wind.
- Expresses concerns about potential negative impacts on local communities, including noise and air pollution, unregulated industrial development, and changes to the character and social fabric of small towns.
- Support a PEIS for planning and implementation and siting in water depths greater than 1,300 meters.

The American Waterways (BOEM-2023-0033-0488)

- Discusses safety, security, and environmental sustainability as primary concerns for construction of offshore wind instruments.
- Supports BOEM's efforts of removing areas conflicting with navigation safety fairways, aligning with the Coast Guard's recommendations.

The Confederated Tribes of the Warm Springs Reservation of Oregon Branch of Natural Resources (BOEM-2023-0033-0689)

- States that although the Draft WEAs do not overlap with the fisheries of the Tribe, the Draft WEAs could still impact “anadromous fish or habitat protected by the Treaty of 1855.”
- Expresses support for the ATNI Resolution #2023-29 and urges DOI and BOEM ensure that tribal interests are appropriately accounted for, citing concerns of inadequate information regarding impacts of offshore wind.
- States that BOEM should consult and engage Tribal Nations, referencing the Council on Environmental Quality (CEQ). Asserts that decision-making regarding OCS wind development should be informed by Indigenous Knowledge.
- States that BOEM should ensure that its environmental impacts review conforms with NEPA.
- Expresses concern “the draft WEAs and the final WEAs will be developed outside of the NEPA process” and recommends a PEIS for the entire Federal action of commercial wind leasing on the OCS with individual EAs or EISs for each proposed lease.
- Asserts that BOEM’s materials do not provide sufficient information to evaluate the scope of the impact analysis and recommends that BOEM “ensure a robust consultation under the ESA and the Magnuson-Stevens Act.”
- Urges BOEM to reconsider its process, which appears to be prioritizing the approval of wind energy projects over meaningful Tribal engagement, incorporation of Indigenous Knowledge, and statutory compliance.

T. Lemezis (BOEM-2023-0033-0491) [Form Letter Master]

- Urges BOEM to minimize impacts on ocean and coastal wildlife in offshore wind development.
- Requests a West Coast-wide PEIS or cumulative impacts analysis for transparent consideration of ecosystem-wide issues.
- For Draft Coos WEA, remove overlapping portion with NMFS-recommended leatherback turtle exclusion area.
- For Brookings WEA, remove NMFS-recommended Blue/Humpback foraging exclusion area to reduce habitat incursions.
- Urges BOEM to analyze wind energy array impacts on upwelling, critical for marine ecosystem productivity.
- Expresses concern over insufficient consideration of onshore connections with high wildfire risk and tourism value.

T. Medina (BOEM-2023-0033-0503)

- Urges BOEM to:

- Create a comprehensive environmental assessment, such as a PEIS;
- Remove the northwestern area of the WEA that overlaps with the NMFS exclusion area for Leatherback turtles;
- Remove the NFMS foraging exclusion area for protected whales;
- Complete an upwelling analysis;
- Complete an environmental impact analysis for the Brookings WEA for Leach Storm Petrels and other fish, including the effects of electromagnetic fields generated by transmission cables;
- Consider anchoring scenarios in the NCCOS spatial analysis for public review.

T. Sandiford (BOEM-2023-0033-0547)

- Expresses concern with potential impacts to visual resources and aesthetics in the Brookings WEA.
- Expresses concern with potential impacts to wildlife, the fishing industry, tourists, and residents.
- Urges BOEM to instead identify an area with fewer residents, tourists, and residents, wildlife migration routes, and beauty.
- VERDE (BOEM-2023-0033-0439) Requests a 30-day extension to the comment period, citing reasons such as the inclusion of more voices; conflicts with ongoing local processes; and needing more time to understand potential impacts.

Vivolva, L. (BOEM-2023-0033-0669)

- Urges BOEM to conduct a timely PEIS before finalizing the siting process for offshore wind development.
- Requests a sufficient analysis of upwelling and how electromagnetic fields created by transmission cables may impact small fish and invertebrate populations.

Underwood, A. (BOEM-2023-0033-0741)

- Expresses general concerns that turbine construction would be detrimental to the fishing industry off Oregon's coast.

Vestas American Wind Technology (BOEM-2023-0033-DRAFT-0510)

- Expresses support for the comments submitted by American Clean Power and Renewable Northwest.
- Urges BOEM and the State of Oregon to move forward with ensuring a 2024 lease auction and execution and to not delay or restart the leasing process.
- Cautions that any further reductions of the Draft Wind Energy Areas could impact Oregon's goal of "3 GW of floating offshore wind by 2030."

V. Graham (BOEM-2023-0033-0526)

- Expresses support for the wind energy, but concern with the impacts of wind energy arrays on wildlife and adjacent communities and urged BOEM to do more intensive studies before leasing.
- Urges BOEM to conduct baseline and concurrent studies on fish, birds, endangered species, and other wildlife, and on upwelling.
- Requests BOEM consider the effects on communities adjacent to WEAs, particularly related to transmission lines.

Walker, K SWMS Carpenter (BOEM-2023-0033-1072) [Form Letter Master]

- Asserts that carpenters, in addition to electric and construction workers, should play an important role in development of Call Sites.

- Advocates for PLAs and other unionization and labor protections for any future construction activities.

Washington Dungeness Crab Fishermen’s Association (BOEM-2023-0033-0261) and (BOEM-2023-0033-0684)

- Requests 30-day extension to the comment period for the Oregon WEAs Draft report and NCCOS Suitability Modeling.
- Argues the comment period and public input gathering falls short of the requested "pause" in the BOEM process, advocating for more time for data collection, scientific research, stakeholder participation, and tribal consultations.
- Incorporates by references the RODA and PFMC comment letters.
- Argues that the Draft WEA provides limited attention to the critical issue of upwelling, with only three mentions in the 186-page report.

West Coast Ocean Alliance (BOEM-2023-0033-0114)

- Requests at least a 30-day extension to the comment period.
- Plans to hold two in-person Summits with partners on the week of October 16th. States that the Summits could help inform substantive comments.

West Coast Pelagic Conservation Group (BOEM-2023-0033-0744)

- Expresses concerns about BOEM’s approach to offshore wind development and perceived lack of concerns of local communities, Tribes or environmental impacts.
- Urges BOEM to consider Tribal consent as a core criterion for siting and designing offshore wind projects on the West Coast.
- Recommends a PEIS for proposed offshore energy development on the West Coast to understand cumulative impacts on the California Current ecosystem.
- Supports green economic development but with assurances it won't harm local fishing jobs, the environment, or Tribal cultural resources.
- Withholds support for offshore wind development until provided assurance that it will not harm the Tribes, its members, and the community.
- Questions the credibility of the NCCOS model, stating it is not designed to work for numerous nuanced and specific species programs.
- Endorses Pacific Fishery Management Council Marine Planning Committee’s draft letter emphasizing the potential substantial impacts of offshore wind on Tribes and the need for meaningful engagement.

West Coast Seafood Processors Association (BOEM-2023-0033-0703)

- Calls for the rescinding of current Draft WEAs/Call Areas and a pause in the process until a robust cumulative impacts study, including socio-economic analysis, is completed.
- Advocates for a transparent, collaborative, and stakeholder-driven process that considers the tradeoffs between offshore wind and existing industries.
- Acknowledges the positioning of WEAs outside the most productive pink shrimp and Dungeness crab grounds but emphasizes the importance of groundfish processing businesses.
- Suggests eliminating scientific survey areas from WEAs to maintain historical datasets for dependable fisheries management.
- Calls for recognizing and modeling fisheries/marine mammal compression shoreward of WEAs to understand potential conflicts and entanglements.
- Urges full collaboration with NOAA and its agencies.

- Recommends a thorough PEIS before moving ahead, citing the importance of studying ecological places, upwelling and fisheries.

White, A. (BOEM-2023-0033-0037)

- Advocates for local fishermen be trained in wind turbine maintenance and to highlight the increase in catch yields around the protected areas.
- Expresses support for offshore electricity generation, as this will lead to dam destruction, thus allowing salmon habitat to increase.
- Suggests creating illustrations of what the turbines will look like from land to demonstrate the turbines before town meetings.
- Argues whales will swim around the turbines.
- Questions wind turbine's impacts on birds.

Williams, B. (BOEM-2023-0033-0660)

- Argues that BOEM's NCCOS planning model did not adequately consider cultural and community values.
- Questions the accuracy of the LCOE values in the analysis.
- Raises concerns that the Brookings and Coos Bay sites overlap with critical habitats of several species.
- Urges BOEM to draft a PEIS for the West Coast.

WNBL Fisheries, inc. (BOEM-2023-0033-0208)

- Expresses opposition ("Please don't do this"), citing harm to the commenter's business as well as birds and other animals.