

**BOEM Oregon NEPA Scoping –
Commercial Wind Lease and Grant Issuance and Site
Assessment Activities on the Pacific Outer
Continental Shelf, Oregon**

Docket BOEM-2023-0065

Scoping Comment Detailed Report

April 12, 2024

Prepared by



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ACRONYMS AND ABBREVIATIONS

BOEM	Bureau of Ocean Energy Management
CFR	Code of Federal Regulations
EA	Environmental Assessment
EFH	essential fish habitat
EIS	environmental impact statement
EJ	environmental justice
EPA	Environmental Protection Agency
MBTA	Migratory Bird Treaty Act
MMPA	Marine Mammals Protection Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NMSA	National Marine Safety Association
NOA	Nearest Onshore Area
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent
OCS	Outer Continental Shelf
OCSLA	Outer Continental Shelf Lands Act
PEIS	programmatic environmental impact statement
PLA	project labor agreement

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INTRODUCTION

On February 14, 2024, the Bureau of Ocean Energy Management published a notice in the *Federal Register* that announced a 30-day public comment period on a Notice of Intent (NOI) to prepare an environmental assessment for commercial wind leasing and site assessment activities on the U.S. Outer Continental Shelf Offshore Oregon. BOEM sought public input regarding important environmental issues and the identification of reasonable alternatives that should be considered in the environmental assessment. BOEM will assess the environmental impacts of any proposed wind energy projects after a lease is issued and before deciding whether or not to approve any lessee's construction and operations plan.

In total 127 submissions containing comments on the NOI were received. Of these, 125 were submitted via www.regulations.gov (docket BOEM-2023-0065) and two via email; 126 were identified as unique and one submission was a duplicate. No form letter campaigns were identified. Each of the submittals contained one or more individual comments on one or more different topics. A hierarchical issue outline was developed to include key issues identified by BOEM staff, issues identified by the commenters, and categories identified in the NOI. Each submittal was then reviewed to identify the substantive comments within each submittal and used the issue outline to associate each substantive comment to the issue(s) to which it applies.

Commenters that expressed specific opinions are identified by footnotes following their summarized statements. These footnotes provide representative examples of the commenters providing particular concerns or opinions and are not meant to be exhaustive of all commenters providing similar comments.

Table 1 identifies the Submission ID number which was assigned to each commenter submission, the commenter name, and commenter type (e.g., federal agency, trade organization) for the 126 unique submissions reflected in this summary. Table 2 provides the count of submission letters associated with each issue topic.

TABLE 1 Index of Comment Submissions Sorted by Commenter Name

Submission ID	Commenter Name	Commenter Type
BOEM-2023-0065-0073	Affiliated Tribes of Northwest Indians	Tribal Government
BOEM-2023-0065-0021	Alice Carlson	Individual
BOEM-2023-0065-0099	American Waterways Operators	Business/Trade Association
BOEM-2023-0065-0064	Andrew Simrin	Individual
BOEM-2023-0065-0063	Anne Campbell	Individual
BOEM-2023-0065-DRAFT-0001	Anonymous	Anonymous
BOEM-2023-0065-0084	Anonymous	Anonymous
BOEM-2023-0065-0062	Anonymous	Anonymous
BOEM-2023-0065-0052	Anonymous	Anonymous
BOEM-2023-0065-0047	Anonymous	Anonymous
BOEM-2023-0065-0037	Anonymous	Anonymous
BOEM-2023-0065-0031	Anonymous	Anonymous
BOEM-2023-0065-0025	Anonymous	Anonymous
BOEM-2023-0065-0024	Anonymous	Anonymous
BOEM-2023-0065-0020	Barbara Edmiston	Individual
BOEM-2023-0065-0079	Bill Gorham	Individual
BOEM-2023-0065-0083	BlueGreen Alliance	Professional Association
BOEM-2023-0065-0007	Bob Blanchard	Individual
BOEM-2023-0065-0094	Bob Morrow	Individual
BOEM-2023-0065-0009	Bonnie Rosta	Individual
BOEM-2023-0065-0075	Bonnie Stratton	Individual
BOEM-2023-0065-0056	Bonnie Stratton	Individual
BOEM-2023-0065-0045	Brad Loseke	Individual
BOEM-2023-0065-0044	Brian Perkins	Individual
BOEM-2023-0065-0035	Candice Fuller	Individual
BOEM-2023-0065-0087	Christine Moffitt	Individual
BOEM-2023-0065-0078	Citizens' Climate Lobby	Individual
BOEM-2023-0065-0121	Climate Solutions	Advocacy Group
BOEM-2023-0065-0109	Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians	Tribal Government
BOEM-2023-0065-0013	Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians	Tribal Government
BOEM-2023-0065-0023	Continuum Industries	Industry
BOEM-2023-0065-0074	Cranky Taxpayer	Individual
BOEM-2023-0065-0067	DARLENE ASHDOWN	Individual
BOEM-2023-0065-0036	David Connors	Individual
BOEM-2023-0065-0032	David Klaus	Individual
BOEM-2023-0065-0011	Debra Reed	Individual
BOEM-2023-0065-0030	Derek Becker	Individual
BOEM-2023-0065-0086	Donna Bonetti	Individual
BOEM-2023-0065-0072	Doug Heiken	Individual
BOEM-2023-0065-0081	EPA	Federal Agency
BOEM-2023-0065-0034	Gwen Feero	Individual

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Submission ID	Commenter Name	Commenter Type
BOEM-2023-0065-0054	Heidi Napier	Individual
BOEM-2023-0065-0115	Ironworkers Local Union 29	Union
BOEM-2023-0065-0095	Jan Hodder	Individual
BOEM-2023-0065-0097	Jennifer Huang	Individual
BOEM-2023-0065-0111	Jennifer Sordyl	Individual
BOEM-2023-0065-0120	Jill Zarnowitz	Individual
BOEM-2023-0065-0055	Joe Wilson	Individual
BOEM-2023-0065-0003	Joseph Reed	Individual
BOEM-2023-0065-0061	Karie Silva	Individual
BOEM-2023-0065-0096	Kathleen Krall	Individual
BOEM-2023-0065-0004	KATHRYN CHAMBERS	Individual
BOEM-2023-0065-0051	Kathy Ward	Individual
BOEM-2023-0065-0089	Ken Bonetti	Individual
BOEM-2023-0065-0002	Kenneth Doxsee	Individual
BOEM-2023-0065-0093	Kevin Gee	Individual
BOEM-2023-0065-0043	Kevin Gee	Individual
BOEM-2023-0065-0058	Kim Rice	Individual
BOEM-2023-0065-0116	Larry Basch	Individual
BOEM-2023-0065-0018	Lincoln County, Oregon	Local Government
BOEM-2023-0065-0006	LIUNA Local 737	Union
BOEM-2023-0065-0066	Lord Maitreya	Individual
BOEM-2023-0065-0106	Makah Tribal Council, Makah Tribe	Tribal Government
BOEM-2023-0065-0076	Mark Bacerra	Individual
BOEM-2023-0065-0029	Marlene Acker	Individual
BOEM-2023-0065-0060	Melinda Deshane	Individual
BOEM-2023-0065-0033	Melinda Deshane	Individual
BOEM-2023-0065-0122	Michael Graybill	Individual
BOEM-2023-0065-0050	Michael Nelson	Individual
BOEM-2023-0065-0125	National Wildlife Federation, Kalmiopsis Audubon Society, Bird Alliance of Oregon, National Audubon Society, et al.	Advocacy Group
BOEM-2023-0065-0090	NOAA	Federal Agency
BOEM-2023-0065-0113	Oregon Chapter of the American Fisheries Society	Professional Association
BOEM-2023-0065-0112	Oregon Department of Energy	State Government
BOEM-2023-0065-0098	Oregon Department of Fish and Wildlife	State Government
BOEM-2023-0065-0080	Oregon Department of State Lands	State Government
BOEM-2023-0065-0101	Oregon Dept of Land Conservation and Development - Oregon Coastal Management Program	State Government
BOEM-2023-0065-0053	Oregon Natural Resource Industries	Advocacy Group
BOEM-2023-0065-0010	Oregon Natural Resource Industries	Advocacy Group
BOEM-2023-0065-0117	Oregon Parks and Recreation Department (OPRD)	State Government
BOEM-2023-0065-0092	Oregon Shores Conservation Coalition	Advocacy Group
BOEM-2023-0065-0016	Oregon Shores Conservation Coalition	Advocacy Group

Submission ID	Commenter Name	Commenter Type
BOEM-2023-0065-0119	Oregon Trawl Commission	State Government
BOEM-2023-0065-0114	Oregon Wild	Advocacy Group
BOEM-2023-0065-0091	Pacific Fishery Management Council	Professional Association
BOEM-2023-0065-0077	Paul Sherman	Individual
BOEM-2023-0065-0127	Phoebe Skinner	Individual
BOEM-2023-0065-0108	Protect The Coast PNW	Other
BOEM-2023-0065-0046	Rene Banes	Individual
BOEM-2023-0065-0042	Rene Banes	Individual
BOEM-2023-0065-0069	Responsible Offshore Development Alliance	Business/Trade Association
BOEM-2023-0065-0104	Rheama Koonce	Individual
BOEM-2023-0065-0070	Robert DeHarpport	Individual
BOEM-2023-0065-0123	Robert Powell	Individual
BOEM-2023-0065-0107	Rogue Climate	Advocacy Group
BOEM-2023-0065-0012	Rogue Climate	Advocacy Group
BOEM-2023-0065-0065	Shannon Christopher	Individual
BOEM-2023-0065-0040	Sharon Rasmussen	Individual
BOEM-2023-0065-0026	Sign on behalf of Rogue Climate and other listed organizations.	Advocacy Group
BOEM-2023-0065-0100	Southern Oregon Climate Action Now	Other
BOEM-2023-0065-0022	Stacey Fox	Individual
BOEM-2023-0065-0071	Steven Miller	Individual
BOEM-2023-0065-0105	Surfrider Foundation	Advocacy Group
BOEM-2023-0065-0041	Susan Callicoatt	Individual
BOEM-2023-0065-0014	The Nature Conservancy (Oregon Chapter)	Advocacy Group
BOEM-2023-0065-0027	Thena Larteri Lyons	Individual
BOEM-2023-0065-0019	Thena Larteri Lyons	Individual
BOEM-2023-0065-0048	Thomas Imlah	Individual
BOEM-2023-0065-0005	Tim Gwinn	Individual
BOEM-2023-0065-0057	Todd Jay Vaughn	Individual
BOEM-2023-0065-0038	Tracy Young	Individual
BOEM-2023-0065-0059	Troy Spence	Individual
BOEM-2023-0065-0126	U.S. Army Corps of Engineers	Federal Agency
BOEM-2023-0065-0124	U.S. Fish and Wildlife Service	Federal Agency
BOEM-2023-0065-0017	Uzair Mohammed	Individual
BOEM-2023-0065-0008	Val Early	Individual
BOEM-2023-0065-0039	Washington County Republican Party	Other
BOEM-2023-0065-0118	Washington Dungeness Crab Fishermen's Association	Professional Association
BOEM-2023-0065-0068	Washington Dungeness Crab Fishermen's Association	Industry
BOEM-2023-0065-0103	Water League	Individual
BOEM-2023-0065-0102	Water League	Other
BOEM-2023-0065-0110	West Coast Seafood Processors Association	Professional Association
BOEM-2023-0065-0015	West Coast Seafood Processors Association	Business/Trade Association

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Submission ID	Commenter Name	Commenter Type
BOEM-2023-0065-0088	West Cost Pelagic Conservation Group	Professional Association
BOEM-2023-0065-0085	WhoPoo App	Other
BOEM-2023-0065-0049	William Howell	Individual
BOEM-2023-0065-0082	World Shipping Council	Business/Trade Association

TABLE 2 Submissions, by Issue

Issue Number	Issue Title	Total Submissions
1	Proposed Action	0
1.1	Purpose and Need for Action	9
1.2	Regulatory Jurisdiction/Statutory Authority	7
1.3	Other comments on the purpose and need for action (including Additional Areas for Consideration)	10
2	Alternatives - Proposed Action and No Action	0
2.1	Proposed Action	4
2.2	Information Considered in Developing This Environmental Assessment	1
2.2.1	Military Use (including comments on the DoD)	1
2.2.2	Maritime Navigation	5
2.2.3	Offshore Infrastructure	15
2.2.4	Foreseeable Activities and Impact-Producing Factors	24
2.2.5	Non-Routine Events	0
2.3	No Action Alternative	2
2.4	Alternatives Considered but Not Analyzed Further	11
3	Description of Affected Environment and Environmental Topics	0
3.1	Geology	14
3.2	Air Quality	3
3.3	Marine and Coastal Habitats and Associated Biotic Assemblages	35
3.4	Marine Mammals and Sea Turtles	26
3.5	Coastal and Marine Birds; Bats	20
3.6	Socioeconomics	22
3.7	Commercial Fishing	25
3.8	Recreation and Tourism	8
3.9	Environmental Justice	5
3.10	Tribes and Tribal Resources	4
3.11	Historic Properties	2
4	Consultation and Coordination, and Stakeholder Comments	8
4.1	Endangered Species Act (ESA) and Marine Mammal Protection Act (MMPA)	5
4.2	Essential Fish Habitat (EFH) Consultation	2
4.3	Coastal Zone Management Act (CZMA)	0
4.4	National Historic Preservation Act (Section 106)	1
5	Other comments	2
5.1	Comments on the Decision Process and Timeline	3
5.1.1	Comments on Lease Terms	7
5.1.2	Comments on Public Comment Process/Engagement/Educating Public	26
5.1.3	Requests to Extend Public Comment Period	23
5.1.4	Comments on Lease Areas	10
5.1.5	Comments on Decommissioning	5
6	General Comments	1

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Issue Number	Issue Title	Total Submissions
6.1	Support	5
6.2	Opposition	36

1 PROPOSED ACTION

Comments associated with this issue are included in the subsections below.

1.1 PURPOSE AND NEED FOR ACTION

Approximately 9 commenters discussed the purpose and need for action.

Several commenters expressed support for the project's potential to develop clean energy and help reach renewable energy targets.¹ One of the commenters said that wind energy projects also support several executive orders that ask the federal government to pursue solutions to the climate crisis with attention to union labor, domestic manufacturing, environmental justice, and protection of natural resources.² Another commenter stated that there are better and cheaper places to develop renewable energy with fewer environmental tradeoffs, including onshore solar and wind. The commenter also argued that there is evidence that increasing renewable energy might increase overall demand for energy, rather than displacing fossil fuels.³ Another commenter said that the environmental assessment (EA) should analyze the benefits toward carbon reduction as well as the carbon costs associated with project construction.⁴

A few commenters said that the National Environmental Policy Act (NEPA) document should clearly identify the underlying purpose and need to which BOEM is responding in proposing the alternatives.⁵

1.2 REGULATORY JURISDICTION/STATUTORY AUTHORITY

Approximately 7 commenters discussed regulatory jurisdiction and statutory authority.

State-level jurisdiction and authority

A commenter remarked that the Department of State Lands, as an administrative agency of the State Land Board, has a regulatory and land management role in developing undersea infrastructure within Oregon's territorial sea's submerged and submersible land. As part of this role, the commenter said that the department reviews and authorizes easements for uses of the seafloor, including placement of cables, pipelines, and other utilities, and also issues permits for the removal and alteration of sediment, rocks, and other materials from the seafloor. The commenter said that any offshore wind project would likely require both an easement and a removal permit.⁶

A commenter said that any future federal leasing and approvals of offshore wind development must be consistent with Oregon's state coastal program and policies, including its Territorial Sea Plan. The commenter stated that Oregon's policies provide clear direction for the protection of marine and coastal resources, as well as the public uses of these resources. The commenter said that the plan also

¹ LIUNA Local 737; Citizens' Climate Lobby; BlueGreen Alliance; Surfrider Foundation; Oregon Department of Energy; National Wildlife Federation, Kalmiopsis Audubon Society, Bird Alliance of Oregon, National Audubon Society, et al.

² BlueGreen Alliance.

³ Oregon Wild.

⁴ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

⁵ EPA; M. Graybill.

⁶ Oregon Department of State Lands.

provides guidance for evaluating potential new uses such as offshore renewable energy. Finally, the commenter urged BOEM to carefully consider the sequencing of federal and state processes so that projects can be evaluated in their entirety, rather than in a piecemeal manner.⁷

Federal-level jurisdiction and authority

A commenter described the requirements under 40 CFR part 55 for the inner and outer continental shelf (OCS):

- For the inner OCS located within 25 nm of a state seaward boundary, sources are subject to the same federal and state requirements applicable to sources in the corresponding onshore area, including the federal requirements at 40 CFR 55.13, and the requirements incorporated by reference into 40 CFR 55.14. Part 55 also requires an owner/operator of an OCS source located in the inner OCS to submit a Notice of Intent (NOI) to the appropriate Environmental Protection Agency (EPA) Regional office and the appropriate air pollution control agencies of the Nearest Onshore Area (NOA) and adjacent states.
- For the outer OCS located beyond 25 nm of a state seaward boundary, sources are only subject to the requirements of 40 CFR 55.13.

The commenter also recommended the EA address anticipated Clean Water Act authorizations, including discharges into Waters of the United States. Finally, the commenter recommended that BOEM make prospective lessees aware of the corresponding NOA for a given project location so that they can complete the necessary step to designate the corresponding onshore area.⁸

A commenter said that they possess jurisdiction by federal law pursuant to Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act. The commenter also stated that site characterization and assessment or construction may require a federal permit pursuant to these laws, federal permission pursuant to 33 U.S.C. Section 408, or a real estate outgrant. Finally, the commenter agreed to be a cooperating agency for the preparation of the EA.⁹

A commenter stated that BOEM's environmental review must be conducted in compliance with the provisions of NEPA, in addition to relevant administrative guidance and directives. The commenter said that the NOI contains a preliminary list of federal permits associated with the proposed action, but does not contain a comprehensive list of federal permits, licenses, and other authorizations that must be obtained in implementing the proposal, as required by 40 CFR 1502.24(b). Finally, the commenter argued that the scope and complexity of the proposed action should lead BOEM to find that the proposed action are likely to significantly affect the quality of the environment, and thus should compel BOEM to proceed with the preparation of an environmental impact statement (EIS) in accordance with 40 CFR 1501.3.¹⁰

A commenter asserted that standards for high-road, equitable, and environmentally responsible development are consistent with federal statute, particularly section 8 of the Outer Continental Shelf Lands Act (OCSLA). The commenter said that in addition to the authority granted to BOEM under OCSLA, precedent exists for the president to direct requirements on leases of the OCS.¹¹

⁷ Surfrider Foundation.

⁸ EPA.

⁹ U.S. Army Corps of Engineers.

¹⁰ M. Graybill.

¹¹ BlueGreen Alliance.

1.3 OTHER COMMENTS ON THE PURPOSE AND NEED FOR ACTION (INCLUDING ADDITIONAL AREAS FOR CONSIDERATION)

Approximately 10 commenters provided other comments on the purpose and need for action.

A commenter asserted that while developing renewable sources of energy is essential to mitigating and abating climate change, any offshore wind development on the Oregon coast must maximize community benefits, meaningfully engage Tribal governments and protect cultural resources, minimize harm to marine and estuarine environments, and protect existing natural resource industries from economic loss and displacement. The commenter urged BOEM to complete a comprehensive analysis and mitigation plan. Further, the commenter recommended that BOEM finalize the Renewable Energy Modernization Rule before moving forward with this leasing project.¹²

A commenter described the utility power planning integrated resources plans, which forecast the scale and timing of utility needs for new resources. The commenter said that potential challenges to meeting the state's clean energy requirements were the subject of discussions during recent plan reviews.¹³

A commenter said that there are limited resources for building out renewable energy infrastructure to address climate change, and that we should favor development of least-cost energy sources such as onshore wind and solar.¹⁴

A commenter stated that it is imperative that we transition from fossil energy to renewable energy as rapidly as possible, but the transition must not trade one set of environmental problems for another. The commenter said that it is necessary to slow down the environmental reviews to allow time for collection of more current, accurate, and focused data.¹⁵ Another commenter urged BOEM to slow down the environmental review process so that several issues can be addressed.¹⁶

A couple commenters said that BOEM should conduct the environmental reviews with a holistic scope of offshore wind development beyond the pre-leasing process, as well as assess the cumulative impacts of multiple offshore wind projects on the west coast.¹⁷

A commenter stated that wind power is too expensive to sustain.¹⁸

2 ALTERNATIVES – PROPOSED ACTION AND NO ACTION

Comments associated with this issue are included in the subsections below.

2.1 PROPOSED ACTION

¹² Oregon Shores Conservation Coalition.

¹³ Oregon Department of Energy.

¹⁴ Oregon Wild.

¹⁵ B. Gorham.

¹⁶ C. Moffitt.

¹⁷ L. Basch; Oregon Trawl Commission.

¹⁸ T. Gwinn.

Approximately 4 commenters discussed the proposed action.

A commenter expressed appreciation for BOEM's extensive research and assessment reports used in the draft the proposed wind energy areas and asked that the research continue.¹⁹

A commenter remarked that the EA should consider alternatives that avoid, minimize, and mitigate adverse effects to various wildlife species, especially since investors will be expected to be able to build once a lease is approved.²⁰

A commenter said that BOEM should spend additional time reevaluating whether portions of aliquots should be removed.²¹

One commenter stated that wind turbines are built with petroleum products and require petroleum products to function, so it would make more sense to use those petroleum products to generate power.²²

2.2 INFORMATION CONSIDERED IN DEVELOPING THIS ENVIRONMENTAL ASSESSMENT

Approximately 1 commenter discussed the information considered in developing this environmental assessment.

A commenter said that it is unclear whether the special scope of the EA and site characterization activities would extend beyond the OCS into Oregon territorial sea, shoreline, and onshore areas. The commenter recommended that BOEM clarify the scope of the EA so all interested parties are aware of the location of site characterization studies.²³

2.2.1 MILITARY USE (INCLUDING COMMENTS ON THE DOD)

Approximately 1 commenter discussed military use.

A commenter suggested including national security concerns in all analyses.²⁴

2.2.2 MARITIME NAVIGATION

Approximately 5 commenters discussed maritime navigation.

A commenter described the location of the Coos Bay and Brooking wind energy areas in relation to existing and proposed fairways, commenting that to the extent that any wind energy area encroaches on proposed routing measures it must be reduced to accommodate navigational safety. The commenter also encouraged BOEM to follow the U.S. Coast Guard's existing regulations to reduce the risk of ship

¹⁹ Oregon Department of State Lands.

²⁰ Oregon Wild.

²¹ K. Silva.

²² D. Becker.

²³ Oregon Department of Fish and Wildlife.

²⁴ C. Moffitt.

collisions.²⁵ Another commenter asked BOEM to evaluate whether subsea cables and associated meteorological buoys would be placed in shipping safety fairways or anchorage areas, danger zones or restricted areas, federal navigation channels, or existing ocean dredged material disposal sites.²⁶

A commenter suggested that the environmental assessment examine how these leases could impact safe navigation in the future, and specifically how undersea power cables could impact safe navigation.²⁷ Another commenter expressed concern about the navigation hazards posed by wind turbine infrastructure, including additional hazards resulting from increased vessel traffic associated with the installation, operation, maintenance, and decommissioning of the infrastructure.²⁸

A commenter said that it anticipated that any offshore wind energy projects in the proposed wind energy areas will cause wind turbine interference to oceanographic high-frequency radars which provide measurement coverage to the region and are especially critical to maritime safety, navigation, U.S. Coast Guard search-and-rescue, and weather forecasting. The commenter recommended that future lessees be required to take into account the need to mitigate wind turbine interference.²⁹

2.2.3 OFFSHORE INFRASTRUCTURE

Approximately 15 commenters discussed offshore infrastructure.

Onshore and nearshore impacts

Multiple commenters raised concerns about the impacts of offshore wind on local ports and port communities, commenting that ports will need significant infrastructure improvements due to limited port space.³⁰ A commenter said that the development of ports and shore-based services for offshore wind infrastructure will pose risks to existing estuarine and coastal habitats, and fill and dredging operations should be a part of the environmental assessment.³¹

A commenter expressed concern about how and where wind energy installations will come ashore and connect to major transmission lines. The commenter urged BOEM to consider the risks wildfires, landslides, and earthquakes as well as the values of state parks and the habitat for several endangered species.³² Another commenter expressed similar concerns, stating that connections to the grid will proceed through state waters and should avoid existing marine protected areas and other key environmentally important and sensitive habitats. The commenter said that cable corridors could impact habitats within and outside lease areas, including ports and areas with important habitats such as estuaries and eelgrass, and argued that the potential impacts of easements and future cable siting should be included in the scope of the analysis.³³

A commenter recommended that BOEM require collocation of transmission lines with existing infrastructure whenever possible to reduce impacts.³⁴

²⁵ World Shipping Council.

²⁶ U.S. Army Corps of Engineers.

²⁷ American Waterways Operators.

²⁸ M. Graybill.

²⁹ NOAA.

³⁰ D. Heiken; Pacific Fishery Management Council; Rogue Climate; Oregon Wild; National Wildlife Federation, Kalmiopsis Audubon Society, Bird Alliance of Oregon, National Audubon Society, et al.

³¹ Oregon Chapter of the American Fisheries Society.

³² V. Early.

³³ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

³⁴ U.S. Fish and Wildlife Service.

General impacts of offshore infrastructure

A commenter expressed concern about the overall consequences of offshore wind infrastructure at the scale BOEM envisions.³⁵

A commenter asked BOEM to identify in the EA the location of proposed subsea cable corridors and meteorological buoys.³⁶

A commenter expressed concern about the impacts of mooring lines and other underwater structures on entanglements.³⁷

A couple commenters wrote that floating offshore wind is functionally different from fixed site offshore wind and the technology has not been evaluated thoroughly.³⁸ One of the commenters also questioned the carbon and mineral footprint of the structures, how decommissioning will be achieved, and how it will compare with alternative approaches on land or with solar.³⁹

A commenter said that BOEM should consider the cumulative impacts of the infrastructure components that will impact benthic floor habitats. The commenter said that the EA should identify how the number of in-water structures deployed by lessees could reduce efficiencies of fishing operations. Finally, the commenter requested the opportunity to review draft plans for site characterization surveys and site assessment activities so that specific information needs can be addressed by site characterization studies to the maximum extent practicable, and that lessees provide a minimum of 30 days for review and comment.⁴⁰

A commenter stated that offshore infrastructure could have impacts on the wind-based ecosystem that will have consequences that are not well understood, but we know that these global currents have regional and international effects on ocean productivity and on land-based ecosystems.⁴¹

2.2.4 FORESEEABLE ACTIVITIES AND IMPACT-PRODUCING FACTORS

Approximately 24 commenters discussed foreseeable activities and impact-producing factors.

Cumulative impacts and environmental impact statements

Multiple commenters recommended that BOEM conduct a cumulative impact analysis to identify how resources, ecosystems, and communities in the vicinity of the planning area will be affected by offshore wind development.⁴²

Some commenters advocated for the completion of a full EIS or programmatic EIS (PEIS) for the

³⁵ Oregon Trawl Commission.

³⁶ U.S. Army Corps of Engineers.

³⁷ Oregon Department of Fish and Wildlife.

³⁸ C. Moffitt; Oregon Wild.

³⁹ C. Moffitt.

⁴⁰ J. Hodder.

⁴¹ Oregon Chapter of the American Fisheries Society.

⁴² EPA; Makah Tribal Council, Makah Tribe; Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians; Climate Solutions; Surfrider Foundation; BlueGreen Alliance; Ken Bonetti; Oregon Shores Conservation Coalition; Oregon Chapter of the American Fisheries Society; Oregon Trawl Commission.

West Coast due to the potential for significant impacts.⁴³ One of the commenters said that the foreseeable environmental and social impacts from port expansion should be considered as part of the PEIS.⁴⁴ A commenter said that BOEM should pause the leasing process and commit to doing a full PEIS. The commenter remarked that a full PEIS analysis would provide valuable information to potential developers looking to establish wind farms off the West Coast, showing where sensitive ecological places exist, which areas are most used by specific fisheries, and more. The commenter said that several Oregon ports, counties, and cities, along with multiple commenters, support doing a PEIS early in the process before leasing.⁴⁵ A commenter expressed disappointment that the scope of the EA would not address construction and operational impacts, commenting that BOEM has not thoroughly analyzed impacts or provided strategies for avoidance or mitigation for these impacts.⁴⁶

Foreseeable events

A commenter said that the EA should consider how climate change could potentially influence the project area.⁴⁷ A commenter suggested that some site characterization activities could impact sensitive habitats, and the magnitude of these impacts depends on many factors.⁴⁸

A commenter said that it is reasonably foreseeable that lessees will traverse offshore waters and conduct survey and site characterization activities; the direct effects of these activities should be evaluated in the EA.⁴⁹

A commenter urged BOEM to include strong mitigation and monitoring measures due to risks from vessel collision, noise impacts, and the potential for habitat displacement.⁵⁰

A commenter remarked that events that could trigger adaptive management might include a documented mortality of an endangered species or increases in the number of migratory birds impacted.⁵¹

A commenter said that there is no reporting requirement or database tracking safety or operational incidents at wind farms.⁵²

Other comments

A commenter wrote that BOEM should ensure that the positive impacts of offshore wind projects are maximized and delivered equitably.⁵³

⁴³ B. Perkins; L. Maitreya; Oregon Shores Conservation Coalition; Washington Dungeness Crab Fishermen's Association; Climate Solutions; National Wildlife Federation, Kalmiopsis Audubon Society, Bird Alliance of Oregon, National Audubon Society, et al.; Surfrider Foundation; Oregon Trawl Commission.

⁴⁴ Oregon Shores Conservation Coalition.

⁴⁵ West Coast Seafood Processors Association.

⁴⁶ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

⁴⁷ EPA.

⁴⁸ Oregon Department of Fish and Wildlife.

⁴⁹ Oregon Dept of Land Conservation and Development - Oregon Coastal Management Program.

⁵⁰ National Wildlife Federation, Kalmiopsis Audubon Society, Bird Alliance of Oregon, National Audubon Society, et al.

⁵¹ U.S. Fish and Wildlife Service.

⁵² Oregon Natural Resource Industries.

⁵³ BlueGreen Alliance.

2.2.5 NON-ROUTINE EVENTS

No comments are associated with this issue.

2.3 NO ACTION ALTERNATIVE

Approximately 2 commenters discussed no action alternative.

A commenter said that BOEM needs to assess the consequences of having no wind turbine arrays deployed offshore, including how Oregon would meet their goals for electrification without floating offshore wind.⁵⁴

A commenter stated that we should use our current natural resources rather than “the man-made, yet to be proven” wind and solar technologies.⁵⁵

2.4 ALTERNATIVES CONSIDERED BUT NOT ANALYZED FURTHER

Approximately 11 commenters discussed alternatives considered but not analyzed further.

A commenter recommended that BOEM consider a phased, precautionary approach that utilizes pilot projects as an alternative to its current proposal. The commenter said that this approach would reduce cumulative impacts from multiple leases and allow BOEM and researchers to study the impacts before scaling up and increasing production across the entire wind energy area.⁵⁶

A commenter suggested that the EA consider spatial and temporal alternatives for site characterization, assessment, and sampling operations to avoid or minimize conflicts in spaces and times when fisheries are most likely to operate. The commenter also requested that BOEM consider excluding aliquots the commenter had identified in previous comments, as they contain sensitive and important habitats.⁵⁷

A commenter asked whether the offshore wind proposal was considered alongside other available renewable technologies and strategies, and whether demand reduction and improved energy efficiency are being considered within an overall energy transition strategy.⁵⁸ Another commenter said that BOEM should highlight the relative costs of different mixes of renewable energy sources.⁵⁹

A commenter said that a better use of money would be to install solar panels, which they said would last longer.⁶⁰

A commenter suggested that the draft environmental assessment include a Fisheries Habitat Impact Mitigation alternative, saying that it will be critical for the alternatives analysis in the EA “to be supported by location-specific benthic and habitat characterizations that can then be used to evaluate and compare the impacts of the alternatives and how well the WEAs avoid complex bottom habitat, spawning areas, and other marine resources. In the analysis, describe whether portions of the potential lease area

⁵⁴ B. Gorham.

⁵⁵ Anonymous [BOEM-2023-0065-0031].

⁵⁶ Oregon Shores Conservation Coalition.

⁵⁷ Oregon Department of Fish and Wildlife.

⁵⁸ K. Bonetti.

⁵⁹ Oregon Wild.

⁶⁰ Anonymous [BOEM-2023-0065-0025].

should be avoided due to potential impacts to complex bottom habitat.”⁶¹

*A couple commenters recommended that BOEM include as alternatives projects that include efforts to minimize impacts or provide restorative solutions.*⁶² *One of the commenters also suggested specific alternatives that include ecosystem protection, different cable corridors, pilot projects, and viewshed protection.*⁶³

*A commenter said that they expect to work with BOEM to complete an alternatives analysis that evaluates a full range of alternatives for the proposed action.*⁶⁴

3 DESCRIPTION OF AFFECTED ENVIRONMENT AND ENVIRONMENTAL TOPICS

Comments on this issue are included in the subsections below.

3.1 GEOLOGY

Approximately 14 commenters discussed geology.

*A commenter stated that a direct effect of lease issuance will include the need for lessees to conduct scientific characterization and construction design planning activities, such as geological and geophysical surveys, within and adjacent to the shore.*⁶⁵

*A few commenters discussed their concerns about geological features and habitats that are not compatible with the development of this project. These commenters suggested that BOEM consider exclusion of these areas that could negatively be impacted by the installation of offshore wind structures. The commenters requested that BOEM also thoroughly identify and describe the methodologies for geological surveys that are conducted during the site assessment/characterization.*⁶⁶ *A few commenters expressed their concerns for wind energy development and the use of wind turbines affecting the geophysical and geological structures surrounding this area.*⁶⁷

*A few commenters urged BOEM to review the risks of earthquakes, tsunamis, wildfires, and other weather conditions that could potentially cause catastrophic damage and destroy the lives of the surrounding communities. These commenters also expressed concern for the marine habitats and environments that could be lost because of these weather conditions if they were to occur.*⁶⁸ *Other commenters requested that BOEM clarify the environmental impacts associated with characterization surveys so all interested parties are aware of what could be a potential risk when executing this project.*⁶⁹

⁶¹ EPA.

⁶² Surfrider Foundation; Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

⁶³ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

⁶⁴ Makah Tribal Council, Makah Tribe.

⁶⁵ Oregon Parks and Recreation Department (OPRD).

⁶⁶ M. Graybill, Oregon Department of Fish and Wildlife.

⁶⁷ Oregon Department of Energy; Oregon Department of Land Conservation and Development – Oregon Coastal Management Program; Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

⁶⁸ V. Early; B. Edmiston; M. Acker; Oregon Natural Resource Industries; M. Graybill; D. Bonetti; J. Sordyl.

⁶⁹ Oregon Wild; Oregon Shores Conservation Coalition; Oregon Department of Fish and Wildlife.

3.2 AIR QUALITY

Approximately 3 commenters discussed air quality.

A commenter wrote that BOEM should evaluate the climate impacts linked to each of the alternatives in this project as they relate to embedded emissions.⁷⁰

A commenter expressed that the impacts of this project could cause harm to surrounding communities due to air pollution from vehicle emissions on land and vessel emissions offshore.⁷¹

A commenter expressed concern for air quality during project development and recommended that the draft EA include, among other elements:

- *A discussion of National Ambient Air Quality Standards (NAAQS) and climate and meteorological conditions of the project area and vicinity;*
- *Estimates of criteria pollutant emissions (e.g., from marine vessel activity) for the project area and a discussion of the timeframe for release of these emissions through the lifespan of the proposed project activities;*
- *Airshed classifications and monitored baseline conditions (design values) for each criteria pollutant;*
- *Seasonal climate descriptions in the wind energy areas, including an assessment of temperature and wind climate using any available data;*
- *A discussion of permit requirements for the siting/characterization, construction, and operations phases of the project; and*
- *A summary of the types of marine vessels and equipment that would be involved with carrying out project activities.*

This commenter stated that BOEM should review an air quality analysis that determines if there is a violation of the National Ambient Air Quality Standards or prevention of significant deterioration increment violation. The commenter urged BOEM to evaluate said standards and emissions to ensure all requirements are being met to ensure the air quality during the development of this project does not affect surrounding communities or marine or coastal habitats.⁷²

3.3 MARINE AND COASTAL HABITATS AND ASSOCIATED BIOTIC ASSEMBLAGES

Approximately 35 commenters discussed marine and coastal habitats and associated biotic assemblages.

Several commenters wrote that offshore wind development would have negative effects on marine habitats and ecosystems.⁷³ Some commenters said that BOEM has not sufficiently considered the effects of offshore wind development on marine ecosystems.⁷⁴

One commenter expressed concern about sensitive habitats and geological features that are

⁷⁰ M. Graybill.

⁷¹ Surfrider Foundation.

⁷² EPA.

⁷³ M. Acker; T. Imlah; Oregon Department of Fish and Wildlife; Makah Tribal Council, Makah Tribe; Oregon Chapter of the American Fisheries Society; Oregon Wild; Oregon Trawl Commission.

⁷⁴ V. Early; Oregon Department of Fish and Wildlife; Oregon Trawl Commission.

incompatible with offshore wind development. The commenter requested that BOEM exclude aliquots due to their ecological significance. According to the commenter, these areas harbor sensitive habitats, including coral communities, methane seep plumes, and rocky substrate, which could be damaged by offshore wind structures.⁷⁵ Another commenter expressed concern about invasive species that could have damaging effects on biodiversity and ecosystem function. The commenter wrote that specialized ships that arrive from distant locations for the construction and installation of offshore wind structures may transport invasive species. They suggested that BOEM document a plan in the draft EA to prevent such transport.⁷⁶

Several commenters expressed concern about how wind arrays will affect upwelling.⁷⁷

A commenter recommended that the draft EA include an evaluation, description, or both, of aquatic habitats in the projected area as well as environmental consequences of proposed alternatives on these habitats.⁷⁸

A few commenters suggested that BOEM conduct habitat mapping.⁷⁹ One of these commenters said that while they support habitat mapping, “some site characterization and assessment activities could impact sensitive habitats such as large coring, drilling, boring, benthic sleds, bottom trawling, large buoy/equipment anchoring, and seismic testing, among others.”⁸⁰ Another commenter wrote that the draft EA should include detailed ground truthing of current mapping and mapping in areas where there are data gaps for biological communities.⁸¹

3.4 MARINE MAMMALS AND SEA TURTLES

Approximately 26 commenters discussed marine mammals and sea turtles.

A commenter urged BOEM to review and incorporate the best available scientific information about marine mammals and sea turtles into its environmental analysis and develop a plan to incorporate new information as it becomes available while the leasing and development process is underway. The commenter recommended National Marine Fisheries Service (NMFS) consultation to consider potential impacts on listed species and their critical habitat and to identify mitigation measures to address noise, entanglement, and vessel traffic. The commenter described several specific species, including their habitats and pre-existing threats.⁸²

A commenter said that there is little data on how marine mammals respond to new disturbances within their habitats, including the permanent introduction of physical structures, increased human activity, and vessel traffic. The commenter cautioned that if enough large, static objects are placed in the marine environment, larger marine mammals may avoid the area altogether, keeping them from important feeding,

⁷⁵ Oregon Department of Fish and Wildlife.

⁷⁶ Oregon Chapter of the American Fisheries Society.

⁷⁷ V. Early; West Cost Pelagic Conservation Group; Oregon Dept of Land Conservation and Development - Oregon Coastal Management Program.

⁷⁸ EPA.

⁷⁹ Pacific Fishery Management Council; Oregon Department of Fish and Wildlife; Makah Tribal Council, Makah Tribe; Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians; National Wildlife Federation, Kalmiopsis Audubon Society, Bird Alliance of Oregon, National Audubon Society, et al.

⁸⁰ Oregon Department of Fish and Wildlife.

⁸¹ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

⁸² National Wildlife Federation, Kalmiopsis Audubon Society, Bird Alliance of Oregon, National Audubon Society, et al.

mating, rearing, or resting habitats, or from vital movement and migratory corridors.⁸³

A commenter said that BOEM should avoid onshore landings or associated construction or facilities in or near areas identified as critical habitat for the Pacific marten.⁸⁴

Other commenters expressed their concerns for both sea turtles and whales. Commenters discussed the ecological harm, damage, and dangers marine life would face due to the installation and maintenance of offshore wind farms.⁸⁵

3.5 COASTAL AND MARINE BIRDS; BATS

Approximately 20 commenters discussed coastal and marine birds and bats.

A commenter expressed concern regarding the impacts of offshore wind projects on birds through habitat loss or damage and disturbance during wind facility construction and operation. The commenter said that some bird species are also known to change course to travel around the perimeters of wind facilities, possibly leading to increased energetic costs when traveling to and from breeding or foraging sites. Finally, the commenter said that there are no reliable methods for measuring rates of collision at offshore facilities.⁸⁶

A commenter expressed concern about several bat species, commenting that although little is known about bat use of marine habitats offshore of Oregon, it is likely that they do occur in marine habitats based on records from offshore ships. The commenter said that due to the risk posed by wind farm collision mortality, wind energy operations should consider the risks and conservation opportunities during siting, monitoring, and operations, and recommended that BOEM conduct baseline and post-construction monitoring. The commenter also asserted that the smart curtailment approach is one of the most effective ways to reduce bat mortality from wind farms. The commenter also described the potential impacts on various migratory and seabird species. Finally, the commenter requested early involvement to help find the least impactful cable crossings and landings that avoid sensitive habitats for shorebirds.⁸⁷

A commenter asked BOEM to consider the full scope of potential impacts to birds occurring in and around the areas under consideration for offshore wind, be transparent in its analysis of these impacts, and provide clearly outlined standard operating conditions for avoiding and minimizing impacts. The commenter described the habitats of various species and the potential impacts to them from offshore wind development.⁸⁸

Multiple commenters argued that wind turbines can cause great harm to several different bird species along the coast, citing the large number of bird species already being harmed in different offshore wind energy locations that have already been installed.⁸⁹

⁸³ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

⁸⁴ U.S. Fish and Wildlife Service.

⁸⁵ J. Reed; V. Early; M. Acker; D. Klaus; G. Feero; R. Baner; WhoPoo App; West Coast Pelagic Conservation Group; K. Bonetti; Rogue Climate; West Coast Seafood Processors Association.

⁸⁶ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

⁸⁷ U.S. Fish and Wildlife Service.

⁸⁸ National Wildlife Federation, Kalmiopsis Audubon Society, Bird Alliance of Oregon, National Audubon Society, et al.

⁸⁹ V. Early; D. Klaus; S. Callicoatt; Anonymous [BOEM-2023-0065-0047-0001]; T. Imlah; Anonymous [BOEM-2023-0065-0052-0002], H. Napier, J. Wilson, Anonymous [BOEM-2023-0065-0062-0001], S. Christopher.

3.6 SOCIOECONOMICS

Approximately 22 commenters discussed socioeconomics.

Support

A couple of commenters expressed support for the proposed project, reasoning that offshore wind projects would support quality jobs in Oregon.⁹⁰

Opposition

Several commenters expressed opposition for BOEM's offshore wind project, reasoning that energy affordability will decrease for consumers.⁹¹

One commenter expressed opposition to BOEM's proposed project due to potential effects on taxpayers. The commenter said that tearing down dams that produce more electricity than windfarms will have a negative effect on taxpayers, who are funding part of the cost of dam removals. This commenter also wrote that windfarms would hurt the commercial and recreational fishing industries, both of which are important to Oregon's economy.⁹²

Other/mixed

A commenter said that taking a piecemeal approach to the environmental assessment prevents a necessary comprehensive assessment of the economic impacts of the proposed project.⁹³ One commenter wrote that an environmental review must consider socioeconomic factors and that the potential impacts of each phase of the proposed project should evaluate socioeconomic impacts, including disproportionate effects on minority and low-income communities, related to the fishing industry.⁹⁴ Another commenter recommended that BOEM analyze impacts of the proposed project on regional subsistence practices and economies in the draft EA. The commenter also recommended that the draft EA document "the baseline subsistence food consumption; changes in the quantity, quality, and/or perceived quality of subsistence foods due to the proposed project; and potential impacts in subsistence practices in response to changes in quality of subsistence resources."⁹⁵ One commenter urged BOEM to include an assessment in the draft EA of whether the proposed project maximizes the creation of high-paying union jobs, expands U.S. manufacturing and domestic supply chains, and delivers community benefits, particularly to disadvantaged communities.⁹⁶

One commenter requested that BOEM mandate a project labor agreement (PLA) on offshore wind work off the coast of Oregon because, according to the commenter, PLAs are the easiest way to ensure that family wage jobs, healthcare plans, retirement benefits, apprenticeship utilization, minority workforce participation, and other crucial working-class supporting policies are present.⁹⁷ Similarly, another commenter wrote about the benefits of PLAs and expressed support for bid credits being given to

⁹⁰ LIUNA Local 737; Ironworkers Local Union 29.

⁹¹ M. Acker; Oregon Natural Resource Industries; T. Imlah; Rogue Climate; M. Graybill; Anonymous (BOEM-2023-0065-0062).

⁹² Oregon Natural Resource Industries.

⁹³ C. Moffitt.

⁹⁴ B. Perkins.

⁹⁵ EPA.

⁹⁶ BlueGreen Alliance.

⁹⁷ LIUNA Local 737.

developers that commit to a PLA or community benefit agreement for their projects.⁹⁸

3.7 COMMERCIAL FISHING

Approximately 25 commenters discussed commercial fishing.

Numerous commenters commented on potential negative effects offshore wind may have on the commercial fishing industry, discussing depletion of fish stocks, impacts on processors and other related industries, and loss of livelihoods in coastal communities.⁹⁹ A couple of commenters stated that loss of fisheries would have wider impacts on national food security, economic growth, and unemployment.¹⁰⁰ One commenter stated that they had engaged in community conversations with local residents and asked BOEM to respond to community concerns around how impacts to fisheries and local industries would be accounted for.¹⁰¹

A couple of commenters expressed concern about specific fish stocks. One commenter warned about the impacts offshore wind would have on salmon populations, especially given that four hydroelectric dams were recently scheduled for removal after outcry related to impacts on salmon.¹⁰² Another commenter stated that the corridors for transmission cables or other industrial access routes will impact vital Dungeness crab, salmon, and pink shrimp habitats.¹⁰³

One commenter said that the proposed WEAs are located in pristine marine habitats that support numerous sustainable commercial fisheries.¹⁰⁴ Another commenter stated that there are no areas off the Oregon coast that are not used by fisheries and that significant amounts of highly important fishing grounds occur immediately inshore of the eastern boundaries of both WEAs; thus, the responsible siting of WEAs poses a challenge.¹⁰⁵ One commenter remarked on the importance of groundfish in commercial fishing and stated that they had previously supported the removal of aliquots deemed necessary for groundfish fisheries from WEAs, which BOEM did not remove from consideration.¹⁰⁶ A few commenters stated that the proposed activity may impact existing NMFS fishery surveys; one commenter suggested that leaseholders align their fish sampling surveys with NMFS efforts to avoid duplication.¹⁰⁷

One commenter stated that the EA should discuss existing fisheries that could be affected by the proposed site assessment and characterization activities. The commenter suggested BOEM analyze acoustic and general disturbances that could affect fish populations. The commenter also recommended BOEM assess impacts on fishermen operating out of Washington and California ports as well as those based in Oregon and thoroughly discuss alternatives.¹⁰⁸

One commenter said that the EA should consider spatial and temporal alternatives for site characterization and assessment to minimize conflicts with commercial fishing activity.¹⁰⁹ The commenter

⁹⁸ Ironworkers Local Union 29.

⁹⁹ A. Campbell; M. Deshane; V. Early; B. Edminston; B. Loseke; Oregon Natural Resource Industries; T. Vaughn; Washington Dungeness Crab Fishermen's Association; J. Wilson; J. Zarnowitz.

¹⁰⁰ West Coast Pelagic Conservation Group; West Coast Seafood Processors Association.

¹⁰¹ Rogue Climate.

¹⁰² Oregon Natural Resource Industries.

¹⁰³ West Coast Seafood Processors Association.

¹⁰⁴ Oregon Trawl Commission.

¹⁰⁵ Oregon Department of Fish and Wildlife.

¹⁰⁶ West Coast Seafood Processors Association.

¹⁰⁷ V. Early; National Oceanic and Atmospheric Association; Oregon Department of Fish and Wildlife.

¹⁰⁸ National Oceanic and Atmospheric Association.

¹⁰⁹ Oregon Department of Fish and Wildlife.

also urged BOEM to include comprehensive economic impacts of site characterization, assessment, and surveys on commercial fishing and related industries.

A few commenters discussed impacts of infrastructure. One commenter recommended that BOEM consider how in-water structures deployed in site characterization activities would displace fishing activity.¹¹⁰ Another commenter stated that increased vessel traffic and offshore buoys could impact fishing area accessibility and port access and urged BOEM to include and propose alternatives in the EA.¹¹¹ A commenter reasoned that increased competition for dock space may impact fishermen and added that anchoring systems used by site assessors should be promptly removed to avoid interference.¹¹²

3.8 RECREATION AND TOURISM

Approximately 8 commenters discussed recreation and tourism.

Several commenters remarked upon the importance of the tourism industry in Oregon.¹¹³ A couple commenters recommended BOEM consider the visual impacts of offshore wind-related activities; one suggested BOEM conduct a visual analysis from the southern viewpoint atop Cape Sebastian State Park¹¹⁴ and the other asked that the EA include impacts of investigation activities on visual resources.¹¹⁵ Another commenter described the essential role of tourism in the Oregon economy and the high value that residents place on their coastlines and conserved lands.¹¹⁶ The commenter recommended that BOEM analyze shoreside impacts on coastal and near shore resources.

3.9 ENVIRONMENTAL JUSTICE

Approximately 5 commenters discussed environmental justice.

One commenter recommended that BOEM use tools like EPA's EJScreen to identify transient users of the project area to identify potential environmental justice (EJ) concerns.¹¹⁷ The commenter urged BOEM to apply guidance from Promising Practices for EJ Methodologies in NEPA Reviews and the Council of Environmental Quality's "Environmental Justice Guidance under the National Environmental Policy Act." The commenter also recommended BOEM characterize project sites with specific information or data related to EJ concerns, supplemented by state and local knowledge. The commenter stated that BOEM should consider short and long term impacts on EJ communities.

A couple of commenters stated that BOEM should consider impacts and benefits for local communities and recommended implementing Community Benefits Agreements.¹¹⁸ One commenter suggested BOEM consider community and Tribal voices, energy access and affordability, workforce development, and local supply chains in the process.¹¹⁹ Another commenter said that BOEM should consider disproportionate impacts on minority and low-income communities in the fishing industry.¹²⁰

¹¹⁰ Oregon Department of Fish and Wildlife.

¹¹¹ Oregon Department of Land Conservation and Development.

¹¹² West Coast Seafood Processors Association.

¹¹³ R. Banes, B. Edmiston, T. Vaughn, J. Wilson.

¹¹⁴ V. Early.

¹¹⁵ Oregon Dept of Land Conservation and Development - Oregon Coastal Management Program.

¹¹⁶ Surf rider.

¹¹⁷ EPA.

¹¹⁸ Bluegreen Alliance, K. Bonetti.

¹¹⁹ Rogue Climate.

¹²⁰ B. Perkins.

3.10 TRIBES AND TRIBAL RESOURCES

Approximately 4 commenters discussed Tribes and Tribal resources.

One commenter warned that offshore wind development would impact the cultural relationships between the Maklak people and their historic homeland in addition to harming the watershed.¹²¹ Another commenter asserted the importance of treaty fisheries to the Makah Tribe, stating that they support 50 percent of the local economy and contribute to nutritional security via food sovereignty and the persistence of cultural practices.¹²² The commenter stated that large-scale offshore wind development on the West Coast will have an impact on Makah culture, economy, nutritional security, and community well-being and concluded that the EA must consider direct and indirect impacts to cultural resources of Tribal nations, which requires Tribal participation in the process.

One commenter discussed the importance of the coastal viewshed and the ocean in the religious and spiritual beliefs, traditional practices, and first foods of the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians.¹²³ The commenter cited a resolution passed by the Confederated Tribes opposing BOEM “moving forward with a lease in Oregon that does not understand or address adverse impacts to the Tribes ways of life.”

One commenter stated that BOEM must respect Tribal sovereignty and acknowledge that Tribes are not a stakeholder in the process but require a government-to-government relationship.¹²⁴

3.11 HISTORIC PROPERTIES

Approximately 2 commenters discussed historic properties.

One commenter expressed concern that lease characterization activities in search of optimal cable routes may intersect with potential locations of historical or archaeological resources that are subject to protection under state statutes and the National Historic Preservation Act.¹²⁵ The commenter recommended that the EA discuss these potential impacts and any measures that will be taken to avoid, reduce, or mitigate them.

One commenter stated that any survey or exploratory work undertaken should document, but not disturb archeological sites and recommended that BOEM work directly with the Tribal Historical Preservation Officer of the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.¹²⁶

4 CONSULTATION AND COORDINATION AND STAKEHOLDER COMMENTS

Approximately 8 commenters discussed consultation and coordination and stakeholder comments.

¹²¹ Water League.

¹²² Makah Tribal Council, Makah Tribe.

¹²³ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

¹²⁴ Rogue Climate.

¹²⁵ Oregon Dept of Land Conservation and Development - Oregon Coastal Management Program.

¹²⁶ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

Tribal consultations

A commenter requested that BOEM provide funding for Tribes to support robust review of the impending draft EA, as the outside firm retained to assist Tribes in the process lacks training or experience. The commenter recommended that BOEM provide a written schedule outlining opportunities for Tribal consultation throughout the development of the EA and written responses to comments provided on the draft EA. The commenter concluded that BOEM has not thus far demonstrated that its actions in the wind energy approval process are consistent with its trust responsibility to Tribes.¹²⁷

A commenter urged BOEM to robustly engage with stakeholders and Tribes, particularly the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.¹²⁸

A commenter recommended that the draft EA discuss the issues raised during Tribal consultations and how those issues were addressed.¹²⁹

Other consultations

A commenter recommended that BOEM coordinate closely with the State of Oregon to ensure offshore wind development meets the state's needs and goals.¹³⁰ A commenter cited existing transmission planning studies, including the US Department of Energy West Coast Offshore Wind Transmission Planning Study and Convening Series and the Western Transmission Expansion Coalition (WestTEC) studies. The commenter stated that the Oregon Department of Energy does not fall within the Council on Environmental Quality's 40 CFR 1508.1(e) definition of cooperating agencies because it does not have any legal jurisdiction or special expertise with respect to any environmental impact involved in a proposal for site characterization surveys and site assessment activities.¹³¹ Another commenter stated that the Oregon Parks and Recreation Department should be consulted if any sampling or surveys are proposed within any Department lands, so they can advise on methods and identify appropriate permitting mechanisms. The commenter also recommended that the EA consider any potential impacts to historic or archaeological resources in coordination with the State Historic Preservation Officer and Tribes.¹³²

One commenter recommended BOEM coordinate with the U.S. Fish and Wildlife Service to comprehensively assess potential impacts on protected species and habitats.¹³³

4.1 ENDANGERED SPECIES ACT (ESA) AND MARINE MAMMAL PROTECTION ACT (MMPA)

Approximately 5 commenters discussed the ESA and MMPA.

One commenter stated that the EA must consider not only species protected under the Endangered Species Act, but also those listed as threatened or endangered by the State of Oregon, as protection status may differ between the federal and state levels.¹³⁴

¹²⁷ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

¹²⁸ National Wildlife Federation, Kalmiopsis Audubon Society, Bird Alliance of Oregon, National Audubon Society, et al.

¹²⁹ EPA.

¹³⁰ Climate Solutions.

¹³¹ Oregon Department of Energy.

¹³² Oregon Parks and Recreation Department (OPRD).

¹³³ U.S. Fish and Wildlife Service.

¹³⁴ B. Perkins.

A commenter stated that numerous marine mammals protected under the MMPA and numerous pelagic birds protected under the Migratory Bird Treaty Act (MBTA) are likely to occur within the boundaries of the proposed wind energy sites. The commenter asserted the difficulty of developing the WEAs in compliance with the ESA, MMPA, and MBTA and concluded that BOEM should proceed with the preparation of an EIS.¹³⁵

A commenter recommended the EA describe collaboration efforts with the U.S. Fish and Wildlife Service, the National Marine Fisheries Service (NOAA Fisheries), and the Oregon Department of Fish and Wildlife to determine potential impacts of proposed project activities on plant and wildlife species, especially those considered at risk. The commenter also suggested the EA identify the species and habitats that might be impacted by each alternative, discuss the project's consistency with the MBTA and MMPA, and put forward mitigation measures.¹³⁶

One commenter stated that the EA should consider the effects of leasing processes on all ESA-listed species and critical habitat within the WEAs and on vessel routes related to the WEAs, in addition to potential survey impacts on marine mammals. The commenter also discussed required consultations with the National Marine Fisheries Service related to ESA consultations and MMPA authorizations.¹³⁷ Another commenter recommended BOEM work closely with the U.S. Fish and Wildlife Service to assess and minimize potential impacts to listed species.¹³⁸

4.2 ESSENTIAL FISH HABITAT (EFH) CONSULTATION

Approximately 2 commenters discussed EFH consultation.

A commenter said that leasing and associated activities would occur within designated EFH for many of the 100+ species managed by the Pacific Fishery Management Council (PFMC) for four federal Fishery Management Plans (FMP's), including Pacific Coast Salmon, Coastal Pelagic Species, Pacific Coast Groundfish, and Highly Migratory Species. The commenter expressed concern about these areas and suggested that these aliquots be excluded from the lease area(s) via an alternative in the EA. In addition to this alternative, the commenter recommended that BOEM require a higher standard of mapping and data collection throughout the lease areas than described in its two relevant guidance documents.¹³⁹

The same commenter stated that avoidance through siting is the most appropriate mitigation strategy for carbonate deposits, deep sea corals, or methane seeps because there are no known strategies to minimize impacts and there is high uncertainty regarding the effectiveness of strategies to compensate or offset damage to these habitats. Therefore, the commenter urged BOEM to require comprehensive benthic habitat mapping at the highest possible resolution throughout the lease areas.¹⁴⁰

4.3 COASTAL ZONE MANAGEMENT (CZMA)

No comments are associated with this issue.

¹³⁵ L. Maitreya.

¹³⁶ EPA.

¹³⁷ NOAA.

¹³⁸ U.S. Fish and Wildlife Service.

¹³⁹ NOAA.

¹⁴⁰ NOAA.

4.4 NATIONAL HISTORIC PRESERVATION ACT (SECTION 106)

Approximately 1 commenter discussed the National Historic Preservation Act (NHPA) Section 106.

A commenter expressed appreciation for the invitation to become a signatory on the Programmatic Agreement and the effort on behalf of BOEM to engage the Tribe in a meaningful way in the NHPA. The commenter said that, consistent with NHPA Section 106, finalization of the Programmatic Agreement and the development of an Inadvertent Discovery Plan must occur, and signatures obtained, prior to any ground-disturbing (seafloor) activities or other project activities.¹⁴¹

5 OTHER COMMENTS

Approximately 2 commenters discussed other topics.

A commenter said that the proposed pumped storage hydroelectric project in Klamath County run by Swan Lake North Hydro LLC serves as a test for future projects and many related statutes. The commenter remarked that the test is incomplete and inconclusive because Oregon state agencies have not participated to the fullest extent as required by ORS 543.015 or sufficiently exercised their jurisdiction required under ORS 469.310.¹⁴²

A commenter said to refer to previous ODOE comments for information on the potential benefits and challenges of developing FOSW on the OCS off the coast of Oregon.¹⁴³

5.1 COMMENTS ON THE DECISION PROCESS AND TIMELINE

Approximately 3 commenters discussed the decision process and timeline.

A commenter said that BOEM's proposed wind farm plan is moving too fast and without concern for Oregon's fishing fleet, seafood processors, coastal security, marine ecosystems and habitat, businesses, scenic ocean views, and those who live along the coast.¹⁴⁴ A commenter stated that considerations of future construction and operation planning might be helpful earlier in the leasing process.¹⁴⁵

A commenter stated that BOEM-led lease identification and sales should be paused as concerns are considered and implications of the proposed development on Oregon's ecosystems and communities that are dependent on it are evaluated.¹⁴⁶

5.1.1 COMMENTS ON LEASE TERMS

¹⁴¹ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

¹⁴² Water League.

¹⁴³ Oregon Department of Energy.

¹⁴⁴ Oregon Natural Resource Industries.

¹⁴⁵ EPA.

¹⁴⁶ Oregon Chapter of the American Fisheries Society.

Approximately 7 commenters discussed lease terms.

A commenter said that the environmental review and permitting process for offshore wind projects is multifaceted and requires navigating numerous applicable legal and regulatory responsibilities. The commenter encouraged BOEM to provide this standardized information to potential lessees to improve their understanding of how project design and siting decisions potentially affect project permitting.¹⁴⁷ A commenter recommended that agreements between lessees and the fishing fleets be reached ahead of at-sea activity to reduce adverse interactions between site assessment and survey vessels with fishing vessels and deployed fishing gear. The commenter also said that, to minimize impacts, benthic habitat should be mapped and characterized via non-disturbing methods before any seafloor disturbing activities are performed¹⁴⁸

A commenter stated that BOEM should utilize the criteria developed in Oregon's roadmap process for any future lease sales and site assessments. The commenter said that if floating offshore wind energy could not meet the suggested steps and criteria outlined in those reports, BOEM should not move forward in the leasing process for floating offshore wind energy.¹⁴⁹ A commenter stated that there is a lack of guidance from BOEM to specific or general principles of conflict avoidance, the approach to unmitigable impacts, the need for a broader look at ocean space to develop, and potential prescriptive exclusion of offshore wind development in certain ocean areas (such as Critical Habitat for protected species).¹⁵⁰

A commenter expressed appreciation for BOEM's NOI highlighting the nuances and differences between its process steps for potential leasing of WEAs and potential floating offshore wind development. The commenter stated that they understand the environmental impacts of any potential floating offshore wind projects that could be proposed in the future are outside the scope of analysis for this EA's proposed action to issue wind energy leases.¹⁵¹ A commenter said that the direct effect of lease issuance would include the need for lessees to conduct scientific characterization and construction design planning activities (such as biological, archeological, geological, and geophysical surveys) within and adjacent to the ocean shore. The commenter remarked that these activities should be evaluated in the EA to inform responsible planning to minimize and avoid conflicts with sensitive resources in not only the lease areas but also the nearshore, ocean shore, and upland landing sites.¹⁵²

5.1.2 COMMENTS ON PUBLIC COMMENT PROCESS/ENGAGEMENT/EDUCATING PUBLIC

Approximately 26 commenters discussed the public comment process/engagement/educating the public.

Public Engagement Appreciation

A couple of commenters expressed appreciation for BOEM's robust community stakeholder engagement.¹⁵³

¹⁴⁷ EPA

¹⁴⁸ Oregon Department of Fish and Wildlife.

¹⁴⁹ Rogue Climate.

¹⁵⁰ Washington Dungeness Crab Fishermen's Association.

¹⁵¹ Oregon Department of Energy.

¹⁵² Oregon Parks and Recreation Department (OPRD).

¹⁵³ LIUNA Local 737; Ironworkers Local Union 29.

Public Engagement Concerns

A few commenters said that the meeting held in Coos Bay did not meaningfully engage the public, as BOEM did not listen to the community's concerns and did not stop to answer questions.¹⁵⁴ A commenter stated that, as there was no testimony for the record taken at this meeting, BOEM violated its promise of a thorough, open, process that valued public engagement. The commenter urged BOEM to delay the process of resuming movement of the wind energy areas toward auction until the concerns of citizens of the southern Oregon Coast have been fully heard and addressed.¹⁵⁵ A commenter expressed concern that BOEM seeks public input but does not address this input if it is negative to BOEM's mission to develop offshore wind.¹⁵⁶

A commenter requested that BOEM conduct at least one public hearing in Coos Bay upon release of the draft EA. The commenter said that BOEM should ensure that this hearing is scheduled at a time and location that is accessible for community participants, specifically after work hours and at a facility that can accommodate all participants (not the City Library). Further, the commenter stated that BOEM must provide ample notice of the hearing so that community members have sufficient time to prepare and participate.¹⁵⁷

A commenter remarked that, as a resident of coastal Oregon who is deeply invested in the welfare of their coastal communities and the preservation of our natural environment, BOEM should pause its leasing process for Oregon WEAs to allow Governor Tina Kotek's administration time to consult with Tribal governments, engage stakeholders in coastal communities, and assist BOEM in identifying, understanding, and responding to local concerns.¹⁵⁸ A commenter said that respect for Tribal sovereignty and meaningful engagement with Tribal nations, not just listening to and ignoring their concerns, is essential. The commenter stated that Tribes have not yet been assured that wind energy as proposed would do more good than harm to Tribal nations.¹⁵⁹

A commenter remarked that one option for meaningful community engagement is creating space for a community benefit agreement negotiation process, resulting in an agreement signed by community benefit groups and a developer, identifying the community benefits a developer agrees to deliver in compensation for impacts.¹⁶⁰ Several commenters urged meaningful engagement with the many members of the affected community (e.g., Tribes) given the far-reaching impacts from this project.¹⁶¹

A commenter said that to help maximize the value of site assessment surveys, all biotic and abiotic data acquired during the site assessment and characterization process should be made publicly available. The commenter stated that to ensure accessibility, data should be published in standardized repositories following best practices.¹⁶²

¹⁵⁴ Oregon Natural Resource Industries; S. Miller; Rogue Climate.

¹⁵⁵ S. Miller.

¹⁵⁶ West Coast Pelagic Conservation Group.

¹⁵⁷ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

¹⁵⁸ Citizens' Climate Lobby.

¹⁵⁹ K. Bonetti.

¹⁶⁰ Oregon Shores Conservation Coalition.

¹⁶¹ EPA; BlueGreen Alliance; Oregon Shores Conservation Coalition; Surfrider Foundation; Makah Tribal Council, Makah Tribe; Rogue Climate; Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians; J. Sordyl; Oregon Department of Energy.

¹⁶² National Wildlife Federation, Kalmiopsis Audubon Society, Bird Alliance of Oregon, National Audubon Society, et al.

5.1.3 REQUESTS TO EXTEND PUBLIC COMMENT PERIOD

Approximately 23 commenters requested to extend the public comment period.

Several commenters requested a 30-day extension of the comment period,¹⁶³ stating that more time is needed for the public and key stakeholders (e.g., Tribal governments and South Coast communities) to meaningfully engage with the comment period.¹⁶⁴ Providing similar reasons, a commenter requested a 60-day extension of the comment period¹⁶⁵ and another commenter requested a 90-day extension.¹⁶⁶

5.1.4 COMMENTS ON LEASE AREAS

Approximately 10 commenters discussed lease areas.

A commenter said that the NOI states that in addition to the no-action alternative, other alternatives may be considered, such as exclusion of certain areas. Therefore, the commenter recommended the EA include an alternative that excludes some aliquots from leasing.¹⁶⁷ A commenter requested that BOEM consider exclusion of aliquots identified in previous comments as these areas contain sensitive and important habitats (e.g., coral communities, methane seep plumes, rocky substrate, etc.) that could be damaged by the installation of offshore wind structures.¹⁶⁸

A commenter expressed appreciation for BOEM's exclusion of the bottom three rows of aliquots in the Brookings draft wind energy area to avoid conflict with long-term fixed survey sampling stations for NMFS' Northern California Current Ecosystem survey, Pre-Recruit survey, and transects for Joint U.S.- Canada Integrated Ecosystem and Pacific Hake Acoustic Trawl Survey (Hake Survey). However, the commenter expressed concern that impacts to some other NMFS surveys would not be avoided by this exclusion, including the West Coast Groundfish Bottom Trawl Survey, the West Coast Pelagic Survey, and the West Coast Marine Mammal Survey. The commenter remarked that the EA should identify potential impacts to NMFS' scientific surveys from site characterization and assessment activities.¹⁶⁹ A commenter stated that the focus of this EA, and the Coastal Zone Management Act review that follows it, should appropriately be focused on the effects of lessee scientific characterization and construction design planning activities.¹⁷⁰

5.1.5 COMMENTS ON DECOMMISSIONING

¹⁶³ Rogue Climate; Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians; The Nature Conservancy (Oregon Chapter); West Coast Seafood Processors Association; Oregon Shores Conservation Coalition; Lincoln County, Oregon; K. Silva; Washington Dungeness Crab Fishermen's Association; Responsible Offshore Development Alliance; Affiliated Tribes of Northwest Indians.

¹⁶⁴ Rogue Climate; Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians; The Nature Conservancy (Oregon Chapter); West Coast Seafood Processors Association; Oregon Shores Conservation Coalition; A. Carlson; S. Fox; Sign on behalf of Rogue Climate and other listed organizations; K. Silva; Washington Dungeness Crab Fishermen's Association.

¹⁶⁵ Protect The Coast PNW.

¹⁶⁶ Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians.

¹⁶⁷ NOAA.

¹⁶⁸ Oregon Department of Fish and Wildlife.

¹⁶⁹ NOAA.

¹⁷⁰ Oregon Dept of Land Conservation and Development - Oregon Coastal Management Program.

Approximately 5 commenters discussed decommissioning.

A few commenters expressed concern that offshore wind turbines would require a costly, large effort to dispose of and have a short lifespan.¹⁷¹ A couple of commenters questioned where decommissioned offshore wind turbines would be disposed.¹⁷²

6 GENERAL COMMENTS

One commenter provided general comments.

One commenter stated that they did not favor or oppose the action at this time but felt that many questions needed to be answered before a decision was made.¹⁷³

6.1 SUPPORT

Approximately 5 commenters expressed support for the proposed project.

Several commenters expressed support for the development of offshore wind and clean energy resources.¹⁷⁴ One commenter stated support for BOEM's effort to support good jobs and community standards in wind development.¹⁷⁵

6.2 OPPOSITION

Approximately 36 commenters expressed opposition for the proposed project.

Numerous commenters expressed opposition to the action because of damage to ecosystems, impacts on fishing and tourism industries, impacts on viewshed, financial feasibility of wind development, and lack of consideration for resident concerns and community stakeholders.¹⁷⁶

¹⁷¹ M. Deshane; S. Callicoatt; B. Stratton.

¹⁷² G. Feero; K. Ward.

¹⁷³ K. Bonetti.

¹⁷⁴ B. Blanchard, U. Mohammed, Southern Oregon Climate Action Now, Oregon Department of Energy.

¹⁷⁵ LIUNA Local 737.

¹⁷⁶ D. Reed; S. Rasmussen; J. Reed; B. Rosta; P. Sherman; J. Sordyl; T. Spence; B. Stratton; T. Young; Oregon Natural Resource Industries.