



Oregon Coastal Caucus

Rep. David Gomberg, Chair
Sen. Dick Anderson, Vice Chair
Sen. David Brock Smith
Sen. Suzanne Weber
Rep. Boomer Wright
Rep. Cyrus Javadi
Rep. Court Boice

January 19, 2024

The Honorable Elizabeth Klein
Director
Bureau of Ocean Energy Management
1849 C Street NW
Washington, D.C. 20240

Dear Director Klein,

The Coastal Caucus is a bicameral, bipartisan group of Oregon State Legislators that represent all legislative districts along the Oregon coast. We address the issues that face our coast based on geography rather than partisanship. More importantly, our lens identifies how a particular issue affects the coastal communities, industries, and economies that make up our districts as a whole. In the case of offshore wind, we must reiterate our position that, while wind energy may fit in the state's goal of moving toward a more renewable future for Oregon, we continue to insist that steps must be taken to ensure that existing ocean users and our coastal communities are prioritized.

The Oregon coast is a region unlike any other. Just offshore, the California Current generates some of the most biologically productive waters in the world, waters that have yet to be industrialized like the remainder of the country's coast. The upwelling that occurs there supports our \$700 million commercial fishing industry and over 7,000 full-time jobs, most of which are in districts along our coast. Coastal community members and individuals tied to the fishing industry have overwhelmingly spoken with great opposition towards offshore wind. These concerns have been echoed by marine scientists, engineers, environmentalists, tribes, and coastal municipalities. We cannot move forward with offshore wind in Oregon until the needs and concerns of these groups have been addressed.

The Oregon Legislative Coastal Caucus has been committed to engaging stakeholders and constituents on offshore wind from the beginning. In 2021, our former Coastal Caucus Chair, then Representative Brock Smith led the effort on our behalf to partner with our fishing stakeholders, community members and others to initiate six listening sessions along the Oregon coast from Astoria to Brookings to hear from a broad group of community members on existing Call Areas. Following the release of Draft Wind Energy Areas (WEAs) in 2023, we noticed that opportunities for in-person public comment were limited to the south coast, ignoring the central coast where a significant proportion of the commercial fishing community is based. In response, we again partnered with ocean users and stakeholders and held an additional listening session to ensure these important voices were heard. In all cases, offshore wind development was met with significant community opposition and calls to slow the process until there is more certainty around community and environmental impacts.

As a Caucus, we have also drafted legislation on this topic, which passed unanimously in the Oregon House of Representatives, with full Republican and Democrat support. In 2021, the Oregon Legislature passed HB 3375, which directed the Oregon Department of Energy to study the benefits and challenges



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of integrating up to three gigawatts of floating offshore wind energy into Oregon's electric grid. The legislation also created needed stakeholder and community engagement to state agencies. Through the process of engagement with stakeholders along the coast, the overwhelming consensus was again serious concerns regarding impacts to existing and future user groups, negative environmental impacts, as well as barriers to the accessibility of our exceptionally sustainable fishing habitat. Not knowing how or when the offshore wind process might move forward, we drafted SB 678 in 2023 to protect our coastal communities and residents by creating a structure for community benefit agreements, a mitigation fund for displaced commercial fishers, and investments in job training for students. Unfortunately, SB 678 did not make it through the 2023 Oregon Legislative Session.

The members of the Coastal Caucus have been supportive of efforts by Governor Kotek, U.S. Senators Wyden and Merkley, and U.S. Representatives Hoyle and Bonamici to pause the offshore wind process in Oregon. While we acknowledge that BOEM has added additional opportunities for public engagement, including the 60-day comment period on the Draft WEAs, we still feel that significant public concerns have yet to be addressed. We must emphasize that, of the 1,100 public comments submitted on Oregon's Draft WEAs, most were in opposition to moving forward with the offshore wind process in Oregon. Even those in support emphasize the need for additional consideration of tribal, fishing, and coastal community voices. In particular, we would like to highlight the following community concerns consolidated by the Oregon Department of Land Conservation and Development (DLCD) from webinars, public meetings, and stakeholder discussions held throughout the comment period:

- Economic and socio-cultural impacts to coastal communities resulting from the potential impacts to fisheries – specifically the mid-water and bottom trawling fisheries – remain a *major* concern. This was a concern identified and documented in the last DLCD comment letter to BOEM regarding the Call Areas
- Floating offshore wind technology is unproven and untested at depths of 300 to 1,300 meters of depth, which could lead to additional risks of economic and environmental harm to Oregon's communities and natural resources.
- Cables and landing sites from offshore wind could present adverse effects to ocean users or species. A greater understanding of how development in the Draft WEAs would relate to the number, scale, and location of cables represent necessary context to understand potential offshore and onshore effects. Cable burial is required to handle ecological impacts and for maximum compatible use of ocean resources.
- Impacts to the viewsheds along Oregon's coast, including important cultural locations of Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians and Coquille Indian tribes, remain a concern following BOEM's visual simulation studies. There is further work to be done to demonstrate specific project impacts if development proceeds in the Draft WEAs.
- There is public concern that the offshore wind projects will cause changes in the oceanography and atmospheric condition of the state, potentially affecting coastal upwelling and primary productivity that contributes to the richness of Oregon's offshore resources.



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- BOEM will need to evaluate and responsibly manage the uncertainties and potential risks related to cumulative impacts from multiple turbines or arrays if development proceeds.
- **Many expressed that the development of a new use of the ocean should not come at the cost of existing uses and resources that provide benefits to food security and the economies of Oregon coastal communities. A comprehensive discussion of community benefits and tradeoffs will likely be a necessary component in any future decision to allow development of offshore wind.**

We recognize this is a federal process in federal waters. However, we are in agreement with the overwhelming majority of our coastal stakeholders and residents and are deeply concerned that the needs of existing ocean users and coastal communities are not being prioritized. We ask that BOEM take further steps to consider the concerns coming from our fishing community and all of those who are stakeholders in one of the best-managed, most sustainable fisheries, and one of the most ecologically abundant and diverse ocean ecosystems in the entire world. As we have said in the past, we stand ready to weigh in and work constructively on this matter, however, **it should not** come at the cost of family wage jobs and the commercial seafood industry that is so critical to our Oregon coastal constituents, their communities, and the businesses that support them.

Sincerely,

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