



October 19, 2023

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

Dear Director Boren,

The Clatsop County Board of Commissioners submitted comments in a June 8, 2022 correspondence; this letter reinforces and augments this prior communication.

Clatsop County recognizes that offshore wind (OSW) energy may be a component of a transition to cleaner energy. In siting such facilities, however, we are committed to a data-driven, transparent and inclusive process that balances multiple interests, including environmental, economic, social and cultural.

Two areas of concern relating to Offshore Wind Farms (OWFs) relative to the Oregon coast:

- 1) The ecological risks derived from the negative impacts of wind energy devices can vary biogeographically, depending on the environmental characteristics and vulnerability of the affected area (e.g., the presence of migrating bird species especially sensitive to wind turbines). The identification of potentially significant impacts is, therefore, always case-specific. In particular, the real impact of an OWF on protected species and habitats will show high spatial variability and must be carefully assessed with respect to local conservation objectives and the affected species/habitats. Furthermore, environmental impacts will also depend on the initial state and resilience of the area, which can change dramatically for some ecosystem elements.

Indirect impacts, which tend not to be fully investigated, must also be considered. Increases in prey species (e.g., pressure tolerant) at OWFs will increase food availability to higher trophic levels (e.g., bird and mammal species), thereby increasing their populations. Impacts will thus vary among species within the same ecosystem element (e.g., different seabird species may be affected in different ways by turbines). In some cases, impacts may be positive (e.g., seabirds have rest areas and more resources for food), while in others, species may suffer significant adverse effects impacting their behavior. Impacts may spread far from the OWF area (e.g., lower number of organisms of migratory populations at the final destination), as is the case for land-based wind farms. It is, therefore, fundamental to consider the spatial and temporal distribution of the most sensitive species when determining the risks associated with a given project. For the adoption of such an approach, better data is required on species distribution and abundance over annual cycles

and on the migration routes of birds, fish, and marine mammals. (Example: Block Island Wind Farm - citing issues from hazards to navigation, vibration from turbines shifting food chain, migratory patterns, and loss of fisheries)

- 2) Higher inflation and capital costs are affecting the entire energy sector, but the geopolitical situation has made offshore wind and its supply chain particularly vulnerable, which does not bode well for the future of offshore wind. Thanks to larger turbines and stronger winds, offshore wind farms tend to produce more of their potential power than onshore or solar, but building them is also more logistically complicated and expensive. Offshore wind farms are unable to show how they will recuperate the large capital investments, without passing the cost to consumers through higher taxes, utility rates, or both. (Example: Rhode Island Energy - increased tax structure to offset development cost as well as up to 40 percent increase in consumption rates).

To ensure a balanced and thorough approach, that considers local factors, interests and concerns, the Board of Commissioners respectfully request:

- BOEM rescind the Coos Bay and Brookings Call Areas and restart the process of identifying Call Areas off Oregon by considering all areas greater than 12 miles offshore, including areas deeper than 1,300 meters.
- After re-starting the process, use spatial planning tools to minimize OSW development impacts to fisheries and ecosystem resources.
- Fully study and review all the concerns regarding marine habitat, marine bird 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. The seafood industry plays a significant role in our coastal community and is an economic driver for our region and state. Reduction in the ability of the commercial fishing fleets to access fishing grounds also reduces the public's access to this publicly held resource.
- Ensure any offshore generation is cost effective, environmentally and economically sound, and ultimately benefits coastal residential and business customers.

While we recognize the potential benefits of offshore wind development, we are concerned about the impacts to our coast economy, the marine environment and to the entire state of Oregon. Please consider to the greatest extent possible, the concerns coming from our fishing community and all the other stakeholders in one of the best-managed, most sustainable fisheries, and one of the most ecologically abundant and diverse ocean ecosystems in the world.

Thanks for your consideration.

Sincerely,



Mark Kujala, Chair
Clatsop County Board of Commissioners