



Oregon Coastal Caucus

Agenda Item E.3
Supplemental Attachment 3
March 2024

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

February 22, 2024

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

Dear Director Klein,

We the Members of the Oregon Legislative Coastal Caucus must express our disappointment with the Bureau of Ocean Energy Management's (BOEM) decision to finalize two Wind Energy Areas (WEAs) for the development of offshore wind off the coast of Oregon. The Coastal Caucus is a bicameral, bipartisan group of State Legislators that represent all legislative districts along the Oregon coast. As a Caucus, we are responsible for representing the voices of the coastal communities, industries, and economies that make up our collective districts. We are writing to again urge that the concerns for our marine environment, fishing communities, and tribes be addressed before this project moves forward.

On February 13th, BOEM announced the designation of two finalized WEAs, encompassing 195,012 acres offshore of Oregon. In their press release, BOEM indicated that the "WEAs were developed following extensive engagement and feedback from the state, Tribes, local residents, ocean users, federal government partners, and other members of the public." We take issue with this statement. 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 outlined those concerns [in a letter addressed to Director Klein](#) (dated 1/19/2024), to which we never received a reply.

The Oregon Legislative Coastal Caucus has been committed to engaging stakeholders and constituents on offshore wind from the beginning. In 2021, members of the Coastal Caucus partnered 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 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



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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 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.

If BOEM is listening to these concerns, their actions suggest that they are not concerned with addressing them. It is worth noting that the sentiments expressed in these listening sessions and state-mandated community engagement opportunities are not dissimilar to those that have arisen through the traditional BOEM process. 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. Given the [recent letter to BOEM](#) from the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians (CTCLUSI) regarding the finalized WEAs, this is a need that BOEM has failed to address. The letter (dated 2/14/2024) cites repeated failures to meaningfully engage with the Tribes on the impact of the WEAs on cultural viewsheds, migratory species, and important fishing grounds. Similar concerns have been expressed by the National Congress of American Indians and local governments, including Lane and Coos Counties.

We recognize this is a federal process in federal waters. However, we stand with the overwhelming majority of our coastal stakeholders and residents who are deeply concerned that the needs of existing ocean users and coastal communities are not being prioritized. We are ready to weigh in and work constructively on this matter. We ask that BOEM take the following steps:

1. Extend the public comment period on BOEM's notice of intent to prepare an environmental assessment of potential impacts from offshore wind development in the WEAs from 30 to 60 days to provide greater opportunity for public input on important environmental issues to be considered.



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2. Support the development of and comply with a state-developed Offshore Wind Roadmap, as proposed in HB 4080 (2024), that defines standards for the development of offshore wind energy, is supported by the Midwater Trawlers Association and West Coast Seafood Processors, and provides effective stakeholder and community engagement.

We cannot support further development of this industry in Oregon without meaningful consideration of the concerns expressed time and again by community members, marine scientists, engineers, environmentalists, fisheries, tribes, and coastal municipalities. We recognize the potential benefits of offshore wind development, but they cannot come at the expense of the Oregonians we represent.

Sincerely,

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