Submitted electronically to Regulations.gov

October 19, 2023

Jean Thurston-Keller
Bureau of Ocean Energy Management
Pacific Regional Office – Renewable Energy Section
760 Paseo Camarillo, Suite 102 (CM 102), CA 90101

RE: Surfrider Foundation Comments on Draft Wind Energy Areas: Commercial Leasing for Wind Power Development on the Oregon Outer Continental Shelf (OCS). Docket No. BOEM-2023-0033-0001

The Surfrider Foundation (Surfrider) submits the following comments on the Draft Wind Energy Areas: Commercial Leasing for Wind Power Development on the Oregon Outer Continental Shelf (OCS). The Surfrider Foundation is a grassroots environmental organization dedicated to the protection and enjoyment of the world's ocean, waves, and beaches for all people. We submit these comments on behalf of our Oregon and Northern California chapters, as well as our U.S. network of 200 chapters and clubs, and more than 500,000 supporters, activists, and members in the United States.

Surfrider appreciates the leadership of the Biden administration in addressing climate change, which is threatening ecosystems, biodiversity and human communities across the United States and throughout the world. Specifically, we support the administration's efforts to promote renewable energy and reduce new oil and gas leasing. Responsibly developed offshore wind offers an important opportunity to address climate change, reduce water and air pollution, and grow a new industry that can support jobs in both coastal and inland communities.

Surfrider also recognizes that offshore wind development may cause significant impacts to coastal and marine ecosystems and adjacent communities. We are aligned with many other organizations in our support of responsibly developed offshore wind, which: (1) avoids, minimizes, mitigates, and monitors for adverse impacts on wildlife and habitats; (2) minimizes negative impacts on other ocean uses; (3) includes robust consultation with Native American Tribes and communities; (4) meaningfully engages state and local governments and stakeholders from the outset; (5) includes comprehensive efforts to avoid negative impacts to underserved communities; and (6)

uses the best available scientific and technological data to ensure science-based and stakeholder- informed decision making.

Oregon Context

Oregon offers both unique opportunities and challenges in the siting, onshoring and transmission of offshore wind energy. As interested and affected parties, Surfrider staff and chapters in Oregon have conducted extensive outreach with both our grassroots network of ocean users and with our local and statewide partners in ocean conservation, wildlife and fisheries. The following comments are structured primarily on behalf of Surfrider Foundation's Oregon Chapter and grassroots network. Please note that we have separately filed more extensive comments and recommendations on stakeholder and government process, specific Draft Wind Energy Area (WEA) site feedback, wildlife and cultural concerns with our ocean and coastal partners in a separate, joint letter of affected parties.

Our Oregon network includes a broad statewide membership base of ocean users and locally-led and formally structured Chapters of our organization in the communities of Coos Bay, Florence, Newport, Tillamook Co., Clatsop Co. and Portland. Throughout BOEM's Call Area process, Surfrider's Oregon network has remained engaged as interested and affected parties in Oregon offshore wind (OSW) development since the fall of 2021. This has included extensive local chapter outreach, webinars and outreach events on behalf of our members and ongoing attendance to public meetings facilitated and hosted by BOEM. Additionally this summer, Surfrider hosted a survey of our primary Chapter leaders in Oregon to gather information and opinions on the potential development of OSW in Oregon and any specific details on the WEAs.

In response to BOEM's Draft WEAs, Surfrider conducted a recent survey of our Oregon chapters' executive leadership from the above described formal Surfrider Chapter network in the state. Thirty-eight participants representing the chapters' executive leadership throughout the state provided feedback on their general awareness of offshore wind, the BOEM process and their general attitudes about the potential benefits and drawbacks of OSW development in Oregon's ocean. The survey, (attached Appendix A) revealed varied opinions with the majority concerned about unanswered questions regarding OSW.

When asked to rank potential benefits of OSW development, over 85% of the Oregon Surfrider chapter leadership indicated that reducing demand for new fossil fuel facilities and decreasing greenhouse gas emissions were top benefits. The top concerns included: OSW development's impact on oceanographic processes and ecological

resources, wildlife conflicts and the impact of onshoring facilities conflicts with recreation. When asked about process and next steps, not a single response indicated that Oregon should move forward with OSW development "as quickly as possible" and several indicated that Oregon should not allow OSW development, responding that the "benefits do not outweigh the negative impacts." The majority of our leadership in Oregon felt that we should move forward with OSW planning in Oregon, but to do so "with caution" under the BOEM process *or* "delay as much as possible" as more data, science and improved Oregon process is needed.

Key Process Recommendations

State of Oregon: Legal Framework Collaboration & Capacity

Surfrider submits that any future federal leasing and approvals of offshore wind development in the Draft Oregon Wind Energy Areas (WEAs) must be consistent with Oregon's state coastal program and policies, including its Territorial Sea Plan. The Oregon Territorial Sea Plan (TSP) was first adopted in 1994 and consists of goals and policies that act as a coordination framework and guide for agencies to use while managing resources within the territorial sea. Oregon's landmark policies provide clear direction for the protection of marine and coastal resources, as well as the public uses of these resources. The plan also provides guidance for evaluating potential new uses such as offshore renewable energy. Oregon's laws and policies are fundamental to protecting the state's communities, economy and way of life, which are integrally connected to its world-class coastal and ocean resources. To that end, Surfrider urges BOEM to work in close coordination with Oregon state agencies, coastal communities, Tribes and the public in its planning and evaluation of offshore wind development to ensure it meets federal consistency with these and other state policies.

Surfrider appreciates that BOEM has collaborated with the State of Oregon; however, the siting process should include more robust, up-front consideration of the compatibility of proposed Draft WEAs with Oregon's laws and policies related to Coastal Zone Management, State and Local Land Use Planning, and the Territorial Sea Plan, especially for the on-shoring portion of wind energy development including necessary port dredging, estuary infrastructure/development, laying cable, building landings, and constructing transmission lines.

We urge careful consideration of the sequencing of the federal and state processes so that projects can be evaluated in their entirety—including ocean, coastal, and terrestrial components—rather than in a piecemeal manner, which would preclude effective consideration of whole-project and cumulative impacts. This is particularly important

given the existing constraints, values and uses of Oregon's ports and estuaries adjacent to the Draft WEAs that will need significant modifications to accommodate FOSW onshore facilities. Early engagement and strong community process is necessary to avoid and minimize impacts to nearshore coastal and estuarine resources, to protect human uses and values, and to support appropriate identification of WEAs and associated onshoring.

If BOEM proceeds with finalizing the Draft WEAs without sufficient consideration of onshoring aspects of wind energy development—and how they will or will not be compatible with the enforceable policies of Oregon's Territorial Sea Plan, Coastal Management Program and State Land use laws— serious obstacles may arise later in the process, after a great deal of time and money has been invested and at a point when it will be far more difficult to make adjustments to avoid and minimize impacts. Accordingly, we urge BOEM to ensure that the identification of WEAs off Oregon is based on sufficient data collection and analysis, as well as appropriate coordination with state and Tribal interests during the planning phase.

Lastly, the eventual leasing in federal waters will trigger an extensive and complex federal consistency process that will demand significant time, resources, and capacity from the State of Oregon. We urge BOEM to allow ample time to ensure meaningful coordination, consistent with 43 U.S.C. 1337(p)(8), between the Bureau and the State of Oregon. This will ensure that the State has time to expand capacity to adequately manage the State's process and public engagement in this process.

Tribal Nations: Meaningful Engagement

Surfrider supports the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians in their request for additional meaningful engagement, including formal consultation throughout the process as required by law, and adherence to the principles of Free, Prior, and Informed Consent. Further, requests to "slow down" the process by key federal ocean management groups such as the Pacific Fishery Management Council, Oregon's Governor and Congressional leadership highlight current social engagement and data analysis gaps that must be addressed. Key opportunities to improve tribal engagement and consultation have again been raised in BOEM's most recent public meetings such as providing more opportunities for oral testimony and government to government consultation.

Comprehensive Planning Gaps

Surfrider is also concerned that the Oregon Draft WEAs were identified without the benefit of a West Coast Regional Ocean Plan process. Under the National Ocean Policy (Executive Order 13457) regional planning bodies (RPBs) are convened to develop comprehensive ocean plans for U.S. regions with participation from all relevant federal and state agencies and Tribes. Such regional ocean planning under an RPB provides for improved public participation, scientific data and mapping, and inter-agency coordination. While Surfrider appreciates the efforts of BOEM in convening the Oregon Intergovernmental Renewable Energy Task Force, we anticipate that further data collection, analysis, and public and stakeholder outreach is needed to evaluate proposed locations for floating offshore wind development. Thus, we reinforce many of the following process recommendations that can be achieved through a collaborative Regional Planning Body process and deeper engagement and consultation with Tribal nations.

Surfrider requests that BOEM prepare a Programmatic Environmental Impact Statement (PEIS) to address potential cumulative impacts from offshore wind development in the Oregon Draft WEAs to the broader marine and coastal ecosystems. Such analysis should include the range of potential effects on the environment and human uses that would result from the commercial build-out of offshore wind projects in the Draft WEAs, including impacts on beach and surf access, coastal habitats, and land use in the coastal zone. The PEIS should also analyze measures to avoid, minimize and mitigate potential impacts, as well as a range of alternatives for wind development within the Draft WEAs. We expect that the PEIS will assist both developers and the agency in supporting project development that provides improved outcomes for public resources and dependent communities.

Nearshore Spatial, Economic Uses & Needed Analyses

Oregon's nearshore marine environment and coastal zone are extremely important to the economy, ecology, and citizens of our state. According to the National Ocean Economics Program, Oregon's ocean economy is worth $3.1 billion annually and supports more than 43,000 jobs. More than 25,000 of those jobs are in tourism, recreation, and fishing—the sectors that may be most impacted by siting of offshore wind farms and related infrastructure. The coast also has high conservation values, with a high percentage of the coastline in state parks and recreation areas plus the Oregon Islands National Wildlife Refuge, which contains critical habitat for over 1 million nesting seabirds and thousands of marine mammals.

A 2015 survey by DHM Research found that "the coast" is one of the things Oregonians value most about our state. More than 80% of Oregonians report visiting the coast each

year for tourism, representing over $2.4 billion in expenditures from ocean recreation alone. Wildlife viewing—including bird and whale watching—as well as fishing, provides important economic value–as well as enjoyment and quality of life for residents and visitors. More than half of the Oregon State Park system's greater than 50 million visits occur on the coast, creating $618 million in annual state park visitor spending. In Coos Bay, Sunset Bay State Park alone provides $24 million annually, generating 382 jobs.

Given the importance of these economic, ecological, culturally and socially significant resources, the PEIS should not only analyze offshore impacts, but also potential impacts to nearshore and coastal resources, as well as dependent human uses. Surfrider partnered with state agencies and Point 97 to complete an Oregon Ocean Recreational Use Study which collected geospatial, economic and demographic data on non-consumptive uses of Oregon's coast and ocean. While the study is over 10 years old, it demonstrated the enormous economic contributions of coastal and ocean recreation alone at $2.4 billion annually.

Surfrider urges BOEM to collect updated data on nearshore and coastal recreation as part of their analysis of the Draft Oregon WEAs, in particular for nearshore and onshore areas identified further below.

Onshoring and Shoreside Impacts and Needed Analyses

Surfrider specifically urges BOEM to analyze the shoreside impacts that could occur in Coos Bay, Oregon and Humboldt County, California and beyond. While the planned lease sales will occur offshore in federal waters, commercial development of offshore wind will require the transmission of power onshore, as well as port development and vessel operations to support project implementation. Such "onshoring" of offshore wind development would result in a range of impacts to the coastal environment and existing human uses. Accordingly, the agency should conduct an onshore landings and nearshore infrastructure impacts analysis and coordinate with Oregon and California state agencies on related assessment and planning.

We urge BOEM to model potential impacts to nearshore beaches and ocean recreation activities, as these uses engage millions of people and generate enormous socioeconomic benefits for Oregon coastal communities. Studies modeling full-scale buildout of wind farms have demonstrated atmospheric and oceanic circulation impacts in the wake of these farms,[1] the physical impacts of full-scale buildout—including wind and wave shadowing and sedimentation and beach profiling—should be modeled to understand impacts to nearshore circulation and the shoreline as it relates not only to ecology but also to recreation. These human recreational uses have not been identified nor were they considered in any the NCCOS

model. Modeling these impacts early is critical to avoiding unintended consequences to existing nearshore uses that have cultural and economic values.

Key Nearshore and Onshore Resources

These widely recognized valuable coastal resources are located onshore latitudinally due East from the Draft WEAs. Depending on the extent of offshore development, distance from shore and where onshoring facilities will ultimately be proposed, there may be fewer or additional valuable coastal resources that will need consideration. We appreciate that BOEM has conducted a preliminary visual analysis and provided visualizations for development from specific sites on Oregon's coast. These visualizations for the Brookings Draft WEA, which is closer to shore, demonstrate visual impacts to some viewpoints with high use by tourists, such as Cape Ferrello.

For the proposed Brookings Draft WEA, these include but are not limited to:

- Estuaries of the Winchuck, Chetco, Pistol and Rogue Rivers, plus Myers and Hunter Creeks, many are state-designated as "natural" and which provide critical habitat for threatened and endangered species.
- Oregon State Parks and Recreation Areas, including Crissey Field, Winchuck State Recreation Area, McVay Rock, Harris Beach State Park, Samuel H. Boardman Scenic Corridor and State Park units within it, Pistol River State Park, and Cape Sebastian State Park, Otter Point State Park
- Viewsheds of these State Parks, which include areas identified as both "Territorial Sea Plan (TSP) Special Area Viewsheds" and "TSP Scenic Class viewsheds," as mapped by OROWIND (TSP VISUAL RESOURCE MANAGEMENT maps)
- Oregon Coast National Wildlife Refuge Complex and associated headlands and islands
- State designated Rocky intertidal Areas, including Lone Ranch Beach, Harris Beach Recreation Area, Winchuck Beach, as well as popular beaches used for recreation including Sport Haven Beach, Myers Creek Beach, the beach at Gold Beach.
- Important Bird Areas: Goat Island, Whalehead Island NWR and Mack Reef[4]
- Designated Rocky Habitat Management sites, including but not limited to Brookings Research Reserve, Coquille Point Marine Garden, Cape Blanco Research Reserve, Harris Beach Marine Garden, and the Pyramid Rock no-take area[5]
- Proposed and existing critical habitats for threatened Marbled Murrelets[6] threatened Silvery Phacelia, Snow Plovers

- Oregon Redwoods, Rogue River-Siskiyou National Forest

For the proposed Coos Bay Draft WEA, these include but are not limited to:

- Estuaries of Coos Bay, the Umpqua River, Siltcoos River, and Tenmile, Tahkenitch, and Eel Creeks, some of which includes critical habitat for threatened southern DPS of Pacific Eulachon, Green Sturgeon and for Oregon Coast Coho
- Oregon State Parks and Recreation Areas, including Seven Devils State Recreation Area, Cape Arago State Park, Shore Acres State Park, Sunset Bay State Park, Yoachim Point State Park
- Viewsheds of these parks, which include areas identified as both "Territorial Sea Plan (TSP) Special Area Viewsheds" and "TSP Scenic Class viewsheds," as mapped by OROWIND (TSP VISUAL RESOURCE MANAGEMENT maps)
- Oregon Coast National Wildlife Refuge Complex and associated headlands and islands
- the Oregon Dunes National Recreation Area including its viewsheds
- Proposed and existing critical habitats for threatened Marbled Murrelets, Snowy Plovers, Pacific Martin.
- Western Snowy Plover State HCP Designated Management Areas: Coos Bay North Spit, Tenmile, North Jetty Umpqua River, Tahkenitch South
- Important Bird & Recreation Areas: Coos Estuary, Umpqua River Estuary, Tahkenitch Creek Estuary, Siltcoos Lake (and estuary), and Siuslaw River Estuary.
- State designated Rocky Intertidal Areas including Five Mile Point, Cape Arago State Park, Sunset Bay State Park, as well as popular beaches used for recreation, including Merchant's Beach, Lighthouse Beach, and Bastendorff Beach County Park
- Designated Rocky Habitat Management sites, including Cape Arago Research Reserve and Gregory Point Research Reserve

<u>Coos Bay Estuary and Community</u>

Surfrider Foundation's Coos Bay Chapter has significant concerns regarding the potential development of onshoring facilities in the Coos Bay estuary that could substantially alter nearshore and estuarine resources. In particular, the Port of Coos Bay proposed navigational channel modifications are of extreme concern for our members for reasons such as the loss of key recreational areas and significant habitat.

While it remains unclear whether such nearshore and onshoring dredging, facilities and associated development for OSW will occur in Coos Bay, these resources and associated economy should be evaluated for baseline information given they may be critical end-of-the line projects necessary for the success of OSW development in Oregon. Such baseline information and analysis would be critical for evaluating trade-offs between ports and various onshore terminals.

In the case of Coos Bay, both Oregon's land use framework and community concerns present obstacles that may only provide resolution through strategic mitigation with affected stakeholders. As recreational users with a significant ecological and economic interest in Coos Bay, we consider this information and analysis to be foundational in any mitigating circumstances of development. Surfrider submits that any OSW facility that may utilize Coos Bay should conduct a resource, cultural and recreational spatial and economic use study of the Coos Bay estuary prior to any lease process and preferably within a PEIS or early approach.

The Coos Bay estuary and nearshore is a unique recreational resource, offering specific opportunities and access that are one of a kind in the State of Oregon. Given the unique nature of the nearshore islands, reefs and varied, rocky headland orientations, this geographical area can offer calm, safe conditions for ocean recreational and commercial users alike no matter what the direction or condition of the weather. For example, many unique dive locations (See Appendix B) can be accessed both inside and outside of the estuary offering unique opportunities when the ocean and sea state is too rough for access. Similarly unique surfing locations and resources (See Appendix C) offer safe, accessible opportunities inside and outside the estuary. Many of these unique locations have been proposed to be altered in development and onshoring for OSW among other uses, some significantly impacting the associated resources in such a way as rendering them unusable and potentially lost forever.

Based on the significance of these unique resources and this ongoing concern from a number of development projects proposed over the years in the Coos Bay estuary (Liquified Natural Gas, Container Ship Export, etc.), our Coos Bay Chapter has formalized a policy position statement, ratified by the executive committee in the fall of 2022 that reads as follows:

Coos Bay community members, the general and visiting public, local businesses, and recreational bay and ocean users, including adjacent beach goers and surfers, are affected by Coos Bay modification, development projects and associated infrastructure and are key stakeholders in local, regional and national project proposals.

Certain limited Coos Bay modification and development projects are necessary for the community livability, economic vitality, and to support important commercial and recreational resources and values within the community. Even certain ongoing restoration efforts can require substantial development activities and projects.

Where Coos Bay modification and development projects are proposed:

- *Restorative and nature-based solutions shall be prioritized over those that further degrade ecological, recreational and cultural resources.*

- *Projects that minimize impacts to, or enhance, ecological, recreational and cultural resources shall be prioritized over those that create significant impact.*

- *Projects that create adverse impacts to ecological, recreational and cultural resources shall demonstrate clear mitigation measures that avoid, minimize, or compensate for effects caused by the proposed action or project. Mitigation for this purpose includes:*

    1. *Avoiding the impact altogether by not taking a certain action or parts of an action.*
    2. *Minimizing impacts by limiting the degree or magnitude of the action and its implementation.*
    3. *Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.*
    4. *Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.*
    5. *Compensating for the impact by replacing or providing substitute resources or environments.*

The Coos Bay Chapter cannot determine its position on any projects within our area of interest that do not financially support third-party comprehensive recreational community benefits analysis. This analysis must quantify and qualify project impacts on recreation, with spatial uses and economic impacts considered. It must also include proposed mitigation measures.

Our area of interest is defined as being ocean shores, state waters, and estuarine habitats contiguous with the coastline between Cape Arago and the Umpqua river mouth.

Humboldt Bay and Community

Surfrider's Humboldt Chapter has expressed concerns regarding potential port development and operations to support floating offshore wind projects off California and Oregon. The proposed Humboldt Bay Offshore Wind Heavy Lift Multipurpose Marine Terminal would impact an ecologically and economically valuable Bay, as well as the marine environment and local communities and Tribes. Marine Terminal development would require extensive dredging, channel modifications, and construction of shore-based infrastructure.

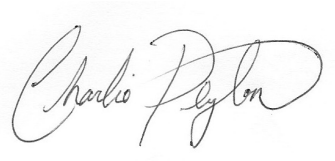
Surfrider's Humboldt Chapter is concerned that terminal expansion and future operations in support of offshore wind energy generation will cause additional pollution and impacts, including air pollution burdens that may occur from vehicle emissions on land and vessel emissions offshore; as well as loss of lower-cost recreational boating opportunities. These burdens would affect workers, visitors and locals — which is of particular concern given the low-income communities and Tribes who live near the Harbor. Additionally, Humboldt has several highly valued surfing areas in and around Humboldt Bay which could be affected by Terminal operations and significantly increased vessel and vehicle traffic.

A 2022 Consistency Determination Report by California Coastal Commission (CCC) staff found that terminal expansion and operations in support of offshore wind energy could cause impacts to surrounding communities, including additional air pollution from vehicle emissions on land and vessel emissions offshore, as well as the potential loss of lower-cost recreational opportunities, like surfing, in the bay and along the coast.

Finally, we would like to reinforce the importance of completing comprehensive federal and state environmental reviews before proceeding with local port development. The proposed Humboldt Bay Offshore Wind Heavy Lift Multipurpose Marine Terminal has been plagued by administrative process issues, as the Harbor District signed a lease agreement with a Terminal developer before embarking on and completing CEQA review. Given the recreational and environmental risks posed by the Terminal and the developer's exceedingly poor cultural and social record, Surfrider Humboldt and many other groups have emphasized the need to complete the CEQA process before signing lease agreements.The Humboldt Chapter has submitted comments to the Humboldt Bay Harbor District and California Coastal Commission on all of the above matters.

The Surfrider Foundation appreciates the opportunity to comment on BOEM's Draft Oregon WEAs. Our organization, including our locally based chapters on the Oregon and California coast, look forward to providing review and feedback on this issue moving forward.

Sincerely,



Charlie Plybon
Oregon Policy Manager
Surfrider Foundation
South Beach, OR
cplybon@surfrider.org

Appendix A - Oregon Chapter Leadership Survey

Oregon offshore wind development survey

Wednesday, October 11, 2023

38

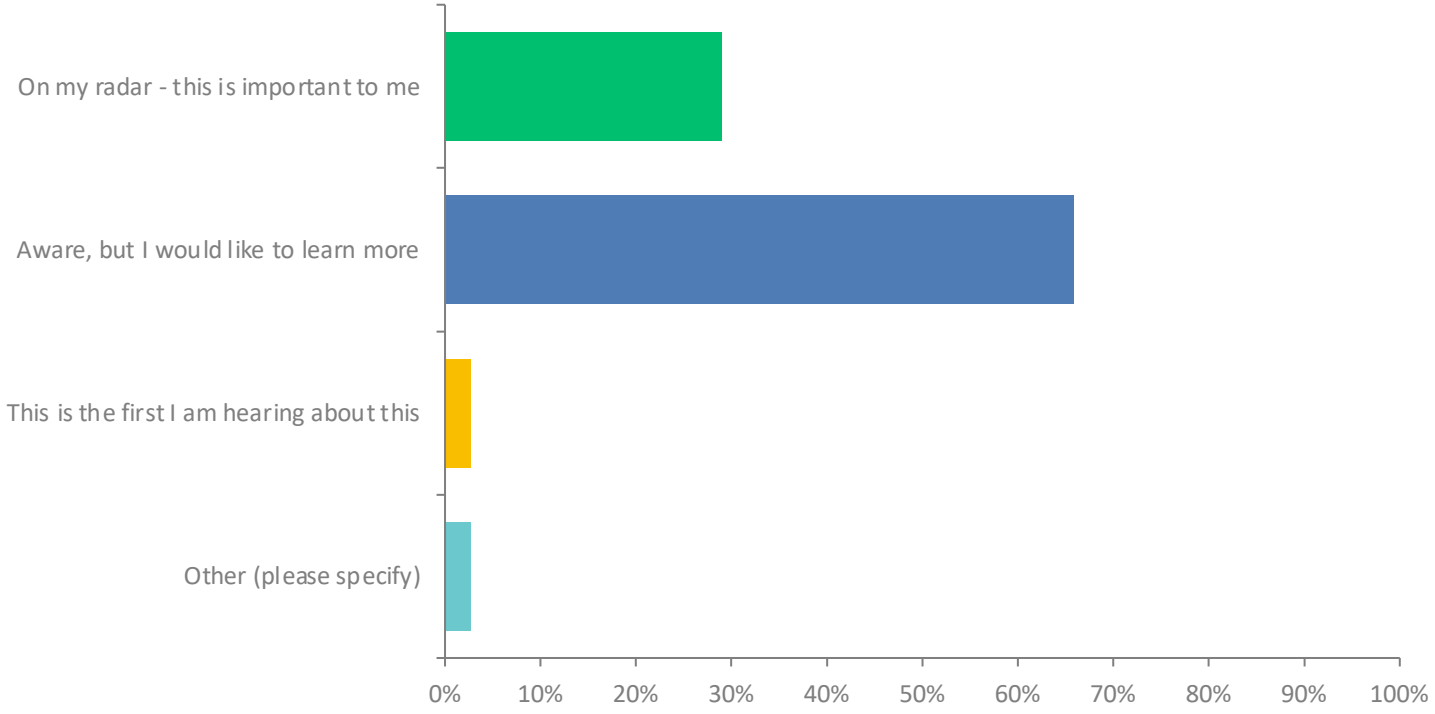
Total Responses

Date Created: Thursday, September 21, 2023

Complete Responses: 38

Q1: How would you rate your general awareness of floating offshore wind farms?

Answered: 38 Skipped: 0



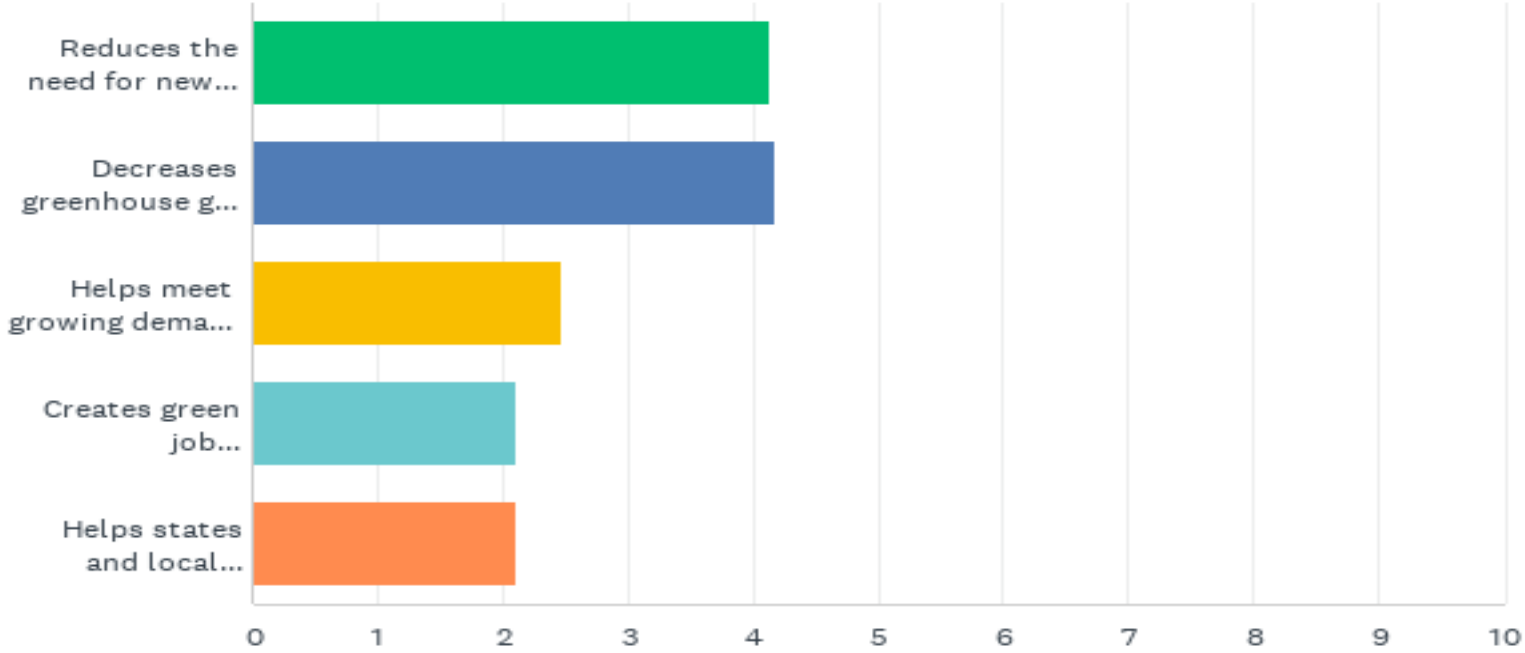
Q1: How would you rate your general awareness of floating offshore wind farms?

Answered: 38 Skipped: 0

ANSWER CHOICES	RESPONSES	
On my radar - this is important to me	28.95%	11
Aware, but I would like to learn more	65.79%	25
This is the first I am hearing about this	2.63%	1
Other (please specify)	2.63%	1
TOTAL		38

Q2: Please rank what you see as potential benefits to Oregon from offshore wind farms. "1" being the most beneficial.

Answered: 36 Skipped: 2



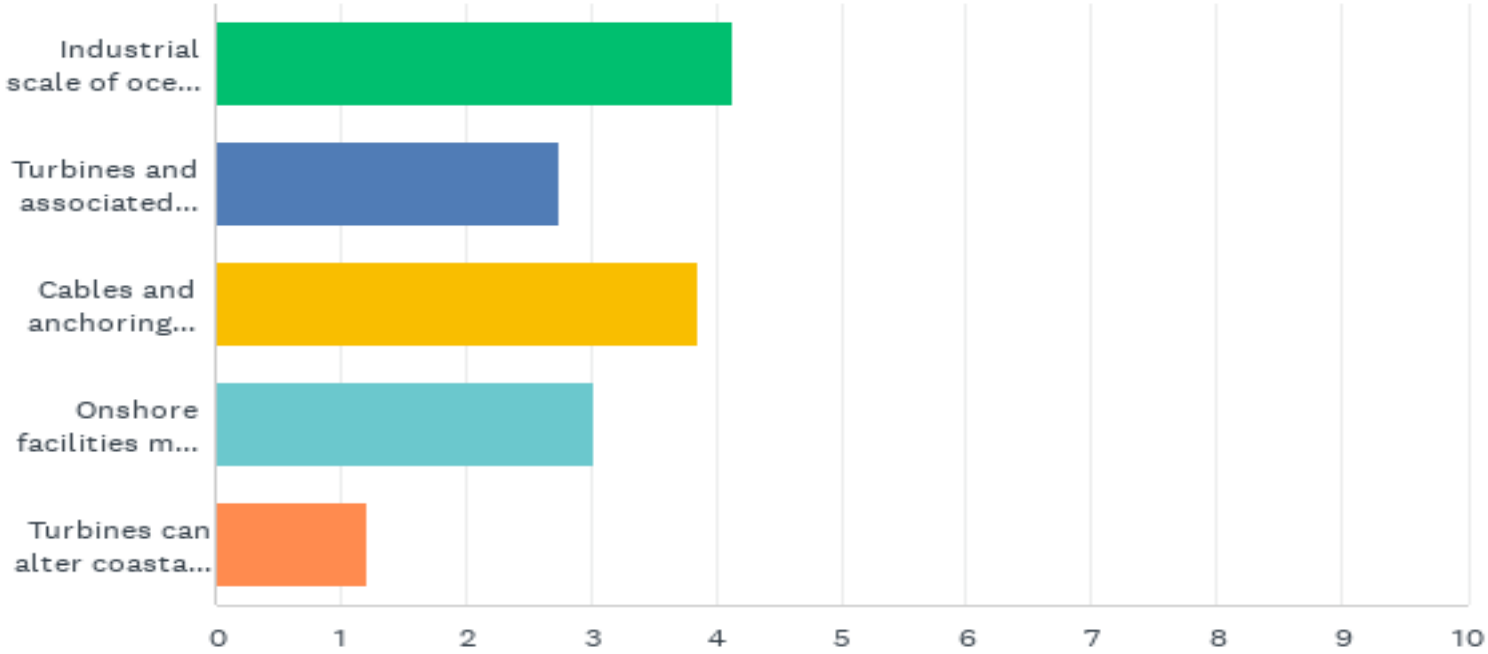
Q2: Please rank what you see as potential benefits to Oregon from offshore wind farms. "1" being the most beneficial.

Answered: 36 Skipped: 2

	1	2	3	4	5	TOTAL	SCORE
Reduces the need for new and existing fossil fuel facilities that pollute	41.67% 15	41.67% 15	8.33% 3	5.56% 2	2.78% 1	36	4.14
Decreases greenhouse gas emissions- the main cause of climate change	44.44% 16	36.11% 13	13.89% 5	2.78% 1	2.78% 1	36	4.17
Helps meet growing demand for national energy needs	5.56% 2	13.89% 5	27.78% 10	27.78% 10	25.00% 9	36	2.47
Creates green job opportunities in coastal areas	2.78% 1	5.56% 2	19.44% 7	44.44% 16	27.78% 10	36	2.11
Helps states and local communities meet renewable energy goals	5.56% 2	2.78% 1	30.56% 11	19.44% 7	41.67% 15	36	2.11

Q3: Please rank what you see as potential negative impacts to Oregon fro offshore wind farms. "1" being of the highest concern.

Answered: 37 Skipped: 1



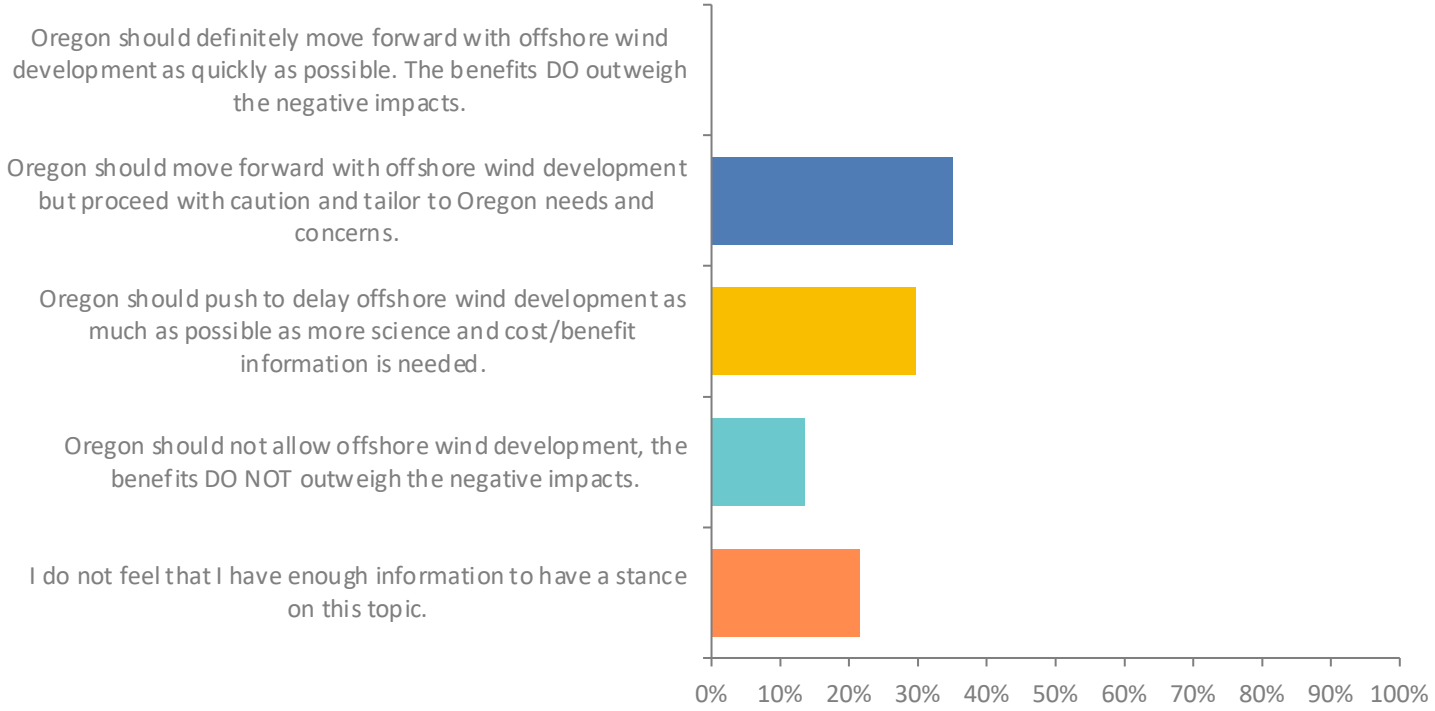
Q3: Please rank what you see as potential negative impacts to Oregon fro offshore wind farms. "1" being of the highest concern.

Answered: 37 Skipped: 1

	1	2	3	4	5	TOTAL	SCORE
Industrial scale of ocean development could create significant oceanographic and ecological changes	51.35% 19	27.03% 10	5.41% 2	16.22% 6	0.00% 0	37	4.14
Turbines and associated cables may conflict with existing uses and access such as fishing	16.22% 6	16.22% 6	13.51% 5	35.14% 13	18.92% 7	37	2.76
Cables and anchoring systems for turbines may entangle whales and conflict with other migrating species both below and above (birds) the ocean	21.62% 8	45.95% 17	29.73% 11	2.70% 1	0.00% 0	37	3.86
Onshore facilities may significantly alter estuary, resources, nearshore recreation and access in Coos Bay	10.81% 4	10.81% 4	51.35% 19	24.32% 9	2.70% 1	37	3.03
Turbines can alter coastal views	0.00% 0	0.00% 0	0.00% 0	21.62% 8	78.38% 29	37	1.22

Q5: Please select which option best aligns with your recommended next step:

Answered: 37 Skipped: 1



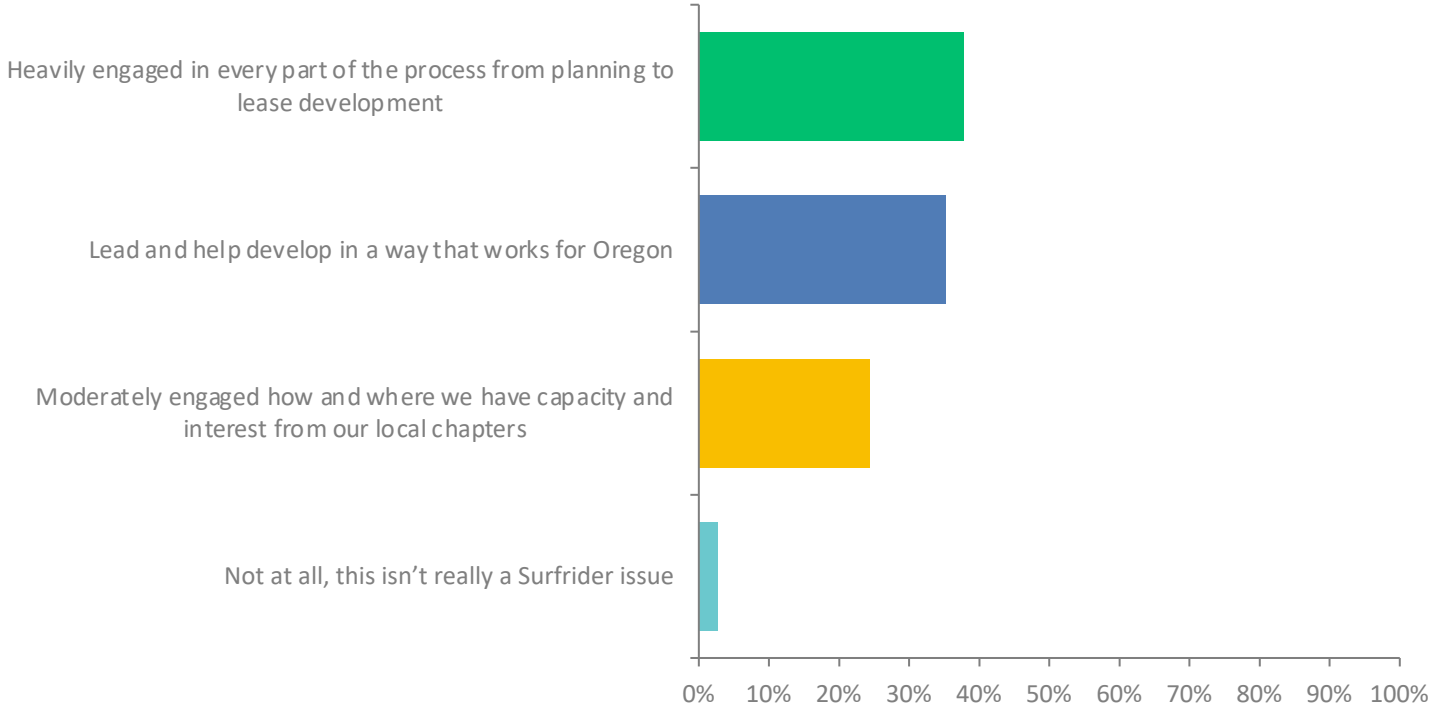
Q5: Please select which option best aligns with your recommended next step:

Answered: 37 Skipped: 1

ANSWER CHOICES	RESPONSES	
Oregon should definitely move forward with offshore wind development as quickly as possible. The benefits DO outweigh the negative impacts.	0%	0
Oregon should move forward with offshore wind development but proceed with caution and tailor to Oregon needs and concerns.	35.14%	13
Oregon should push to delay offshore wind development as much as possible as more science and cost/benefit information is needed.	29.73%	11
Oregon should not allow offshore wind development, the benefits DO NOT outweigh the negative	13.51%	5

Q6: How do you think Surfrider staff should be involved in this issue?

Answered: 37 Skipped: 1



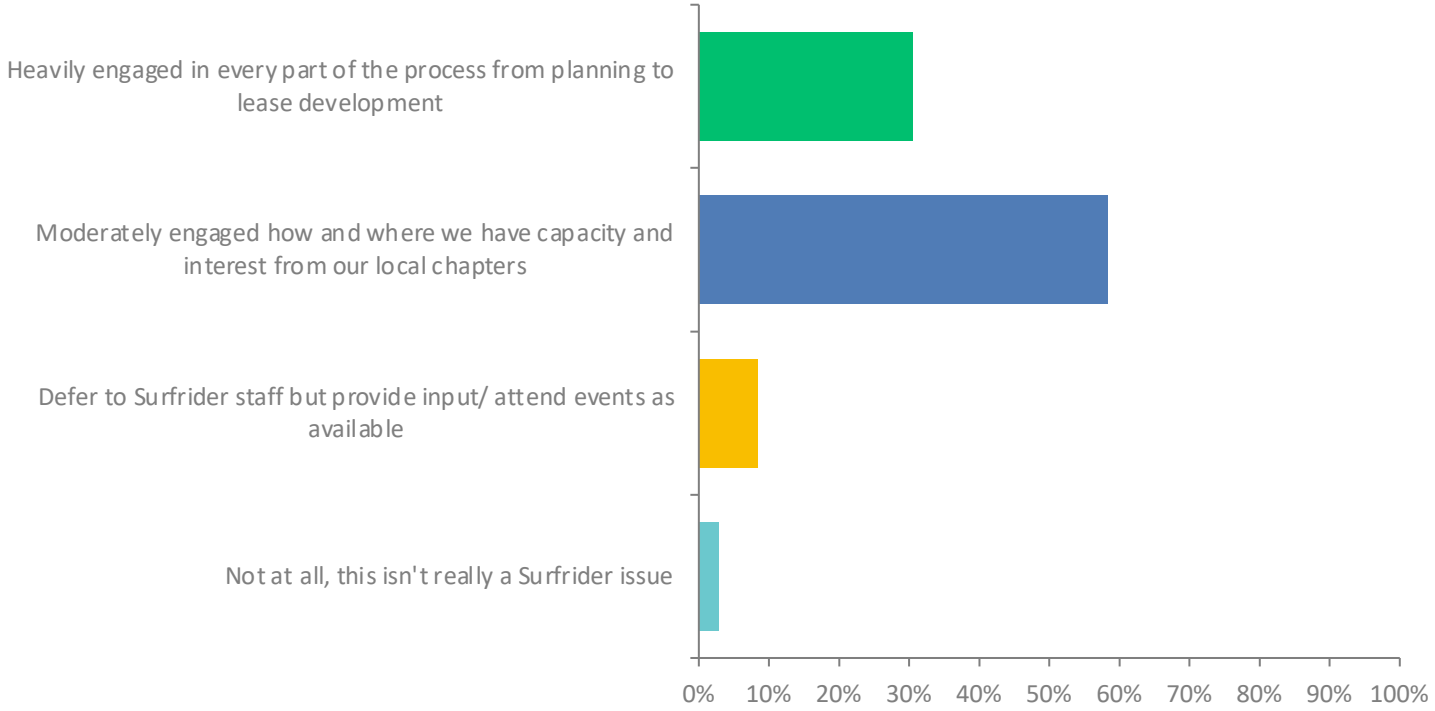
Q6: How do you think Surfrider staff should be involved in this issue?

Answered: 37 Skipped: 1

ANSWER CHOICES	RESPONSES	
Heavily engaged in every part of the process from planning to lease development	37.84%	14
Lead and help develop in a way that works for Oregon	35.14%	13
Moderately engaged how and where we have capacity and interest from our local chapters	24.32%	9
Not at all, this isn't really a Surfrider issue	2.70%	1
TOTAL		37

Q7: How do you believe that Surfrider volunteers should be involved in this issue?

Answered: 36 Skipped: 2



Q7: How do you believe that Surfrider volunteers should be involved in this issue?

Answered: 36 Skipped: 2

ANSWER CHOICES	RESPONSES	
Heavily engaged in every part of the process from planning to lease development	30.56%	11
Moderately engaged how and where we have capacity and interest from our local chapters	58.33%	21
Defer to Surfrider staff but provide input/ attend events as available	8.33%	3
Not at all, this isn't really a Surfrider issue	2.78%	1
TOTAL		36

Q4 Can you think of other potential benefits or negative impacts offshore wind development may have to Oregon? Please describe.

Answered: 17 Skipped: 21

#	RESPONSES	DATE
1	My main concern is the lack of knowledge we have about the affect that this will have on an entire ecosystem that we all depend on.	10/11/2023 1:45 PM
2	May be destroyed by natural or human causes and contribute to junk on the sea floor and beaches	10/10/2023 9:54 PM
3	oil spills r/t leaking or un maintained wind turbines? Batter by storms causing spillage of pollutants from turbine engines? I don't know that this is a actual issue.	10/10/2023 9:36 PM
4	Some concern that energy produced offshore Oregon would not be to the benefit of south coast, but would simply enter the grid.	10/9/2023 9:04 PM
5	How long will it take for enough clean energy to be produced to breakeven from the carbon footprint cost of creating the wind farms? The turbines will be highly visible from shore and could impact tourism in the adjacent communities.The construction phase seems to present challenges that would negatively impact the local communities (not to mention the carbon footprint of producing, shipping parts from China, and then assembling). I know the fishing community is very concerned about this effecting their livelihoods, but I'm unclear if this is fear of change based or if it's based in reality. Will there actually be less fish or less opportunity to catch fish if wind farms are developed?	10/6/2023 5:17 PM
6	Not an answer to your question but is the energy created staying in OR?	10/4/2023 12:44 PM
7	Nothing positive about this! Have you ever been up close to these and heard the noise? It’s an environmental HELL!	9/28/2023 11:15 PM
8	Negative - whale migration and resident whales	9/28/2023 10:33 PM
9	More interties = negative impact	9/28/2023 9:36 PM
10	loacalize power generation	9/27/2023 10:30 AM
11	No just the ones previously listed above	9/26/2023 9:35 PM
12	There are no benefits from industrializing the ocean. There are many other options for producing energy on land that are less costly. There costs associated with offshore wind are way greater than those to put facilities on land.	9/26/2023 9:04 PM
13	Staging areas could adversely impact local access to the coast and danage natural areas.	9/26/2023 7:24 PM
14	recycling turbine blades is not ready for prime time	9/26/2023 9:00 AM
15	How long will the blades and infrastructure last? Will the components degrade significantly faster than if they were on land, and does this negate the benefits of having a more consistent source of wind?	9/25/2023 7:37 PM
16	pollution from assembly, repair, travel, and operation. Anything from oil/gas boats and rigs to parts falling into the ocean.	9/25/2023 6:29 PM
17	Centralized renewable energy production may supplant more democratic distributed renewable energy production options (e.g. rooftop solar & distributed wind generation, community solar gardens).	9/25/2023 5:06 PM

Charleston SCUBA Diving

The nearshore ocean of Charleston is filled with exciting dive sites. Popular harvest targets such as black rockfish, lingcod, and rock scallops can be found in good numbers on just about every rocky area. Viewing dives are excellent among the kelp beds and boulder fields. Highlights include: stalked pink hydroids found at Norton Gulch, estuarine populations of Copper rockfish, and the beautifully colored "Simpson Reef" rock greenling in the shallow kelp beds.

Gregory Point Research Reserve is one of the state's oldest subtidal reserve areas, it allows fishing but not for invertebrate harvest. The site provides refuge for species important to local fisheries such as red sea urchins and rock scallops. The Cape Arago Research Reserves (areas A,B &C) pertain only to intertidal areas and does not restrict harvest below the lowest low tide levels. See current sport regulations for details.

Boat dives are best, but some good shore dives can be accessed with rugged walking and swimming. Visibility tends to be best in winter and spring though 10-15' visibility can frequently be found in the summer. Wave heights, current, and boat traffic are critical to consider on any dive. Diving offshore takes extra skill and expertise. This chart should not be used for navigation.

Appendix B - Dive Map

North Jetty/ The Cribs:
Consider drift dives on the jetty. Anchor carefully at "The Cribs", dive during slack water. Rockfish and lingcod can be found.

Further up the bay:
Empire boat ramp is an easy shore dive. Additionally, there are good boat dives on the east side of the lower bay for crab and clams. Beds of orange sea pens can be found east of the channel around buoy #10A (not on map)

Tri-leg buoy #1:
Demarking the entry to the Charleston nav channel and a subtidal jetty that extends from Fossil Point. Many species of fish and invertebrates are found.

Baltimore Reef:
A yellow buoy "BR" demarks the end of this reef. Tidal currents and boat traffic make this dive extremely difficult to execute.

Cape Arago Lighthouse:
The kelp bed north of the lighthouse is a good dive in south wind. Depths are 15-45' within the kelp bed and current is minimal.

Gregory Point Research Reserve:
This reserve only excludes take of invertebrates. There are many great kelp dives within. Areas within the emergent rocks are protected from swell, but visibility is not as good as offshore. Big lingcod are common in these shallows during winter.

North Simpson Reef:
Great dives can be found along three ridges that extend from Simpson Reef. The wreck of the steamship "Brush" can be found at the northwest corner of the reef.

Simpson Reef:
With skilled navigation, excellent dives can be found in the middle of Simpson Reef. The inside of the reef has Oregon's only giant kelp (*Macrocystis*) bed and is an excellent dive, stay distant from sea lions.

South Cove:
Extensive kelp beds and shallow depths are found.

OIMB Kelp Bed:
A rare estuarine kelp bed. The bottom is low relief sandstone with many juvenile fish.

Charleston Bridge:
For those not bothered by low visibility, this is a great viewing dive. Many species of fish and invertebrates can be found on the hard substrates of the bridge and shell hash.

Cape Arago Lighthouse:
A steep trail and a long swim will take you to some nice 20-30' kelp dives on the north side of the Cape Arago Lighthouse.

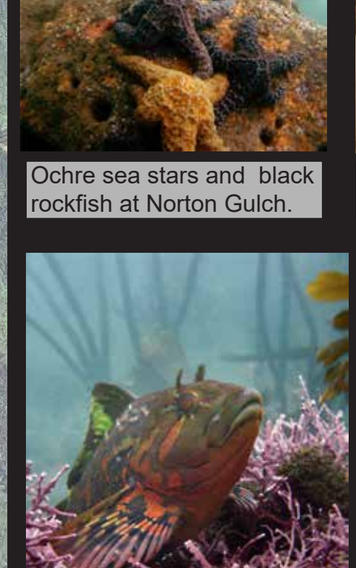
Sunset Bay:
The middle of the Sunset Bay is sandy, while the sides are shallow and rocky. Entry is easy, but depths are shallow and good visibility is rare.

Norton Gulch:
A narrow gulch just south of Sunset Bay, follow a dirt trail to the water. Swim directly out 200 yards and drop down to 30'. Swim left into shallow purple sea urchin herds, straight out to black rockfish schools and right to some nice ridges and walls. Good visibility is rare.

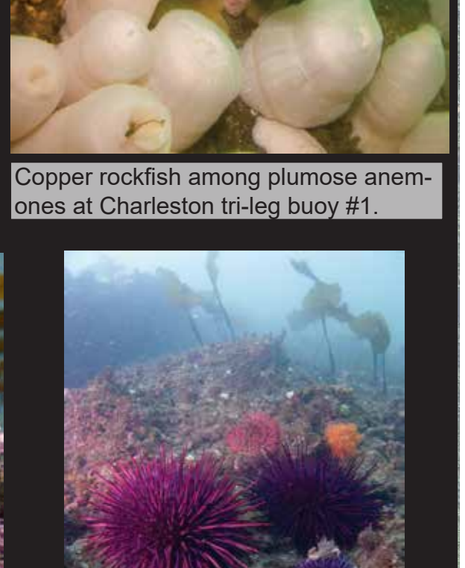
South Cove:
A steep paved trail and long swim takes the adventurous diver down to an excellent reef. Swim southwest to find kelp beds and rocky reefs 15-40' deep.

Legend

- Dive Site
- Kelp beds
- Cape Arago Research Reserve Areas A&C
- Cape Arago Research Reserve Area B
- Gregory Point Subtidal Research Reserve



Strawberry anemones, red sea urchins, and a rock scallop at Cape Arago.



Red soft coral on a wall at South Cove.

Ochre sea stars and black rockfish at Norton Gulch.

Copper rockfish among plumose anemones at Charleston tri-leg buoy #1.

A rock greenling laying on coralline algae at Simpson Reef.

Sea urchins, cucumbers and anemones among the kelp at Gregory Point Research Reserve.

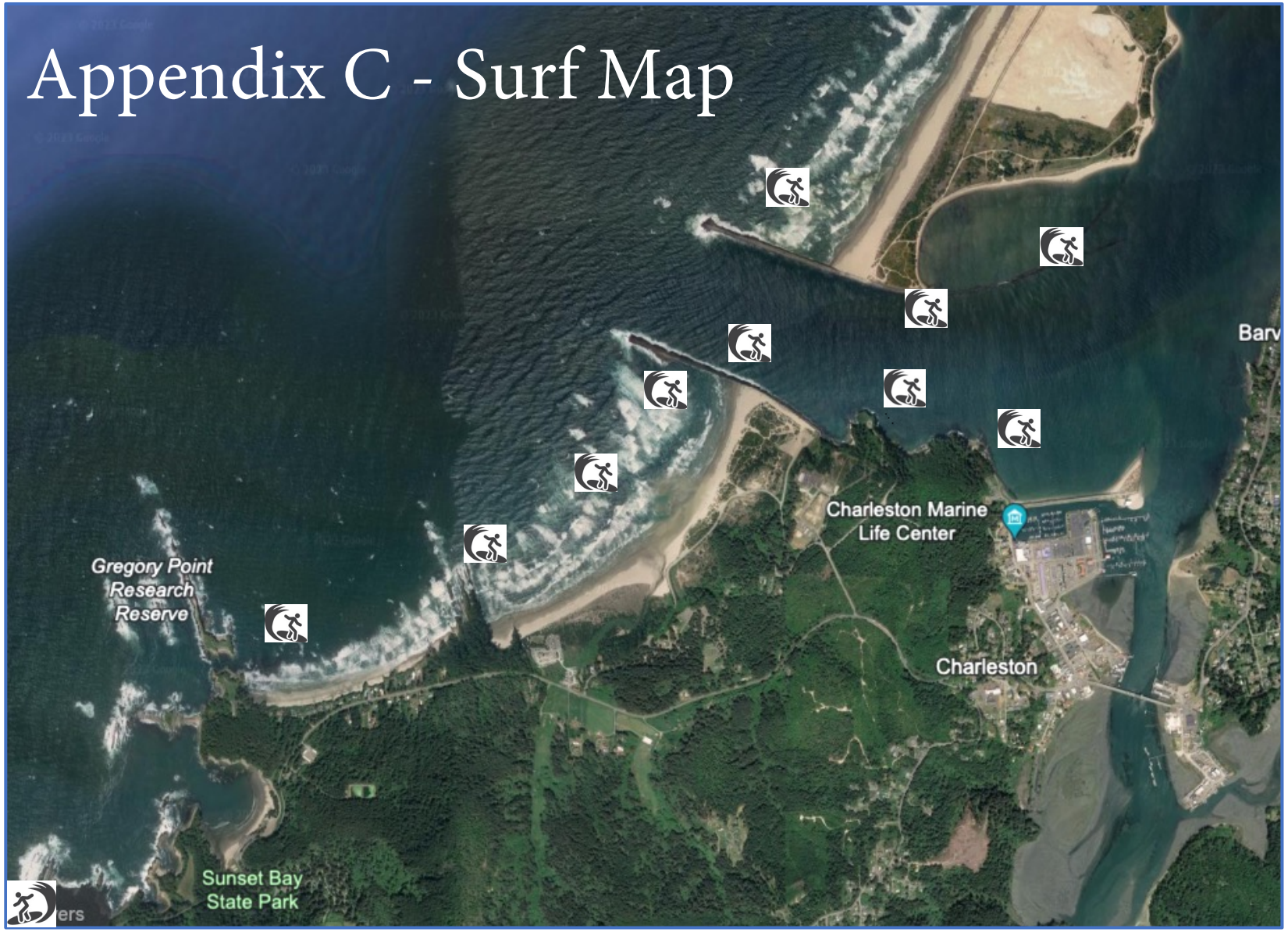
MARINE RESOURCES PROGRAM

Consult the current ODFW sport regulations before harvest. More information on shellfish including species identification, harvest maps and regulations can be found at: www.dfw.state.or.us/MRP/shellfish

Design and photographs: Scott Groth

OREGON Fish & Wildlife

Appendix C - Surf Map



Local examples of outstanding and unique surfing resources and locations. These resources are most sensitive to swell, bathymetry, prevailing winds and associated landmark protections - particularly bay dredging/modification and onshoring developments have been proposed with irrevocable harm to these resources.