



Responsible Offshore Development Alliance

December 2, 2022

Adrienne Thomas
NOAA PRA Officer
151 Patton Avenue, Room 159
Asheville, NC 28801

Re: OMB Control Number 0648—744 - Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Resident Perceptions of Offshore Wind Energy Development Off the Oregon Coast.

Dear Adrienne:

The Responsible Offshore Development Alliance (RODA) appreciates the opportunity to offer the following comments on the *Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Resident Perceptions of Offshore Wind Energy Development Off the Oregon Coast* (Request).¹ RODA is a coalition of fishery-dependent companies, associations, and community members committed to improving the compatibility of new offshore development with their businesses. Members of our coalition operate in federal and state waters off Oregon as well as other states along the Pacific, New England, and Mid Atlantic coasts.

We support the proposed information collection. Our comments are intended to inform any survey instrument(s) utilized when undertaking the project. Given the unique nature of the Oregon coast and its residents, we propose modifications to a similar survey effort undertaken in North and South Carolina.

The Request asks whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility. We are concerned about the ability to complete the Oregon project in a timely fashion relevant to prospective offshore wind energy siting and buildout. A similar study in the Carolinas took almost four years to complete.² BOEM's stated timeline for developing offshore wind off Oregon includes lease sales in late 2023 or early 2024 which is considerably less than four years. An incomplete, or rushed, project may limit the study's practical utility and add to the genuine stakeholder fatigue for interested parties.

The Request also seeks input on ways to enhance the quality, utility, and clarity of the information to be collected. While we are supportive of gaining an understanding of the viewpoints of coastal residents, the survey questions must be designed in a way that do not lead the participant to answer a certain way. An example of an inappropriate question would be *Would you prefer development of offshore wind off Oregon to your coastal community being negatively affected by*

¹ 87 Fed. Reg. 59781 (Oct. 3, 2022).

² See [Assessing Social Values Relative to Offshore Wind Energy Areas in North & South Carolina - NCCOS Coastal Science Website \(noaa.gov\)](#)



Responsible Offshore Development Alliance

impacts of climate change?

Appendix A of *Resident Perceptions of Local Offshore Wind Energy Development: Support Level and Intended Action in Coastal North and South Carolina* is the Survey Instrument utilized.³ Missing from the survey is any reference to resident's perceptions of the local commercial fishing industry, or the preference for locally harvested seafood. Oregon residents place a high value on supporting the local fishing industry and a number of commercially and recreationally important fish stocks are integral to the identity and culture of many small coastal communities. Salmon, Dungeness crab, groundfish and albacore are seasonal seafood products that provide food security to many Oregonians.

Given recent scientific studies, we recommend the survey include asking residents how their perceptions of offshore wind would change if large-scale wind farms were found to have negative impacts on the marine ecosystem, protected species and/or food security.

Thank you for your consideration of these comments. Please do not hesitate to reach for further clarification.

Sincerely,

Mike Conroy, West Coast Director

Annie Hawkins, Executive Director

Lane Johnston, Programs Manager

Responsible Offshore Development Alliance

³ Goedeke, Theresa L., Sarah Ball Gonyo, Chloe S. Fleming, Jarrod L. Loerzel, Amy Freitag, and Chris Ellis. 2019. [Resident Perceptions of Local Offshore Wind Energy Development: Support Level and Intended Action in Coastal North and South Carolina](#). Sterling (VA): US Department of the Interior, Bureau of Ocean Energy Management. OCS Study BOEM 2019-054. 100 p. See page 88