



**West Coast Seafood Processors Association**  
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January 26, 2023

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

*Re: OMB Control Number 0648-0744 - 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 Ms. Thomas:

The West Coast Seafood Processors Association (WCSPA) 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). This request invites public comment on the nature of obtaining public perceptions from coastal Oregon residents regarding offshore wind energy.

WCSPA represents shoreside seafood processors in California, Oregon, and Washington whose fishermen participate in almost every West Coast fishery and target a variety of species including Dungeness crab, groundfish (including rockfish, sole, sablefish or "black cod," and Pacific hake or "whiting"), Pacific pink shrimp, salmon, and albacore tuna, among others. Our member companies range from small "mom-and-pop" processors to the largest, vertically integrated processors on the West Coast. We employ thousands of people in Oregon's seafood industry, primarily in coastal areas. WCSPA member companies are essential workers, and the food products they produce are integral to our nation's food security.

WCSPA generally supports the information collection as outlined in the documents online at [https://www.reginfo.gov/public/do/PRAViewICR?ref\\_nbr=202212-0648-005](https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202212-0648-005). We also support, and incorporate by reference, the comments submitted in December 2022 by the Responsible Offshore Development Alliance (RODA). However, we have concerns regarding the lack of some questions in the draft survey, [0648-0744 Appendix A, Survey Instrument 12 15 2022](#), and the level of specificity in other questions. We also have more general concerns.

### Survey Questionnaire Concerns

#### 1. Marine Ecosystems

The proposed survey questions make no mention of offshore marine ecosystems. Oregonians, especially coastal Oregonians, are familiar with the general nature of marine ecosystems. Most understand the delicate nature of ecosystems, whether on land, the estuaries or the ocean, and how disrupting them can have significant effects to their enjoyment of and dependence on the coastal environment. Yet the agency responsible for this survey, NOAA, neglects to include any

mention of marine ecosystems or currents, such as the California Current Large Marine Ecosystem, that extend beyond Oregon borders and could be disrupted by offshore wind development.

## 2. Food Security

None of the questions mention food security. “Fisheries jobs” and “fishing grounds” were listed, but the link to how those fisheries jobs produce seafood for the public and enhance food security is not made clear. Respondents should know and understand that “fisheries jobs” do not necessarily mean the crewmen or captains of sport or commercial vessels. Fisheries jobs include seafood processing, shipping and jobs created by the entire seafood supply chain. The fish and shellfish sold in the grocery store exemplify how seafood jobs contribute to U.S. food security: Our products are sustainably harvested, available to the public and include some of the healthiest proteins on the market. A more appropriate phrase for “fisheries jobs” may be “seafood industry jobs, including fishing.” This description more accurately reflects the nature of the seafood industry and how it contributes to food security.

## 3. Birds/seabirds

While many coastal Oregon residents are familiar with birds – the songbirds in their backyard, the gulls and other nearshore birds at the beaches – many may not be familiar with the seabirds that spend most or all of their lives at sea or in other countries. These pelagic birds include petrels, albatrosses, etc., that depend on the California Current off the Oregon Coast; seabirds you do not see unless you travel far offshore or to other countries but whose lives depend on Oregon waters and are integral to the marine ecosystem off Oregon. More appropriate terms could include “pelagic birds,” “seabirds and shorebirds,” “birds, including seabirds and shorebirds,” or something similar.

Without the addition of marine ecosystems or the specificity regarding food security and pelagic birds, respondents may fail to make informed responses about their attitudes regarding offshore wind and the ocean environment with which they are familiar.

## General Concerns

## 4. Information Use

The [0648-0744 document, Appendix C, Postcards and Letters](#), says: “The purpose of this survey is to collect information policy makers will use XXX.” It is clear that, so far, the designers/proposers of this survey and study do not know how policy makers will use the result(s). Without a clear understanding of the goal of the study and how the results will be used, it is difficult to provide comments on the scope of the questions. Most of the questions are neutral in nature, but there is no indication as to how the results will be collated. Will the raw survey results be tallied in such a way as to overwhelmingly support offshore wind development? Or will the results genuinely inform potential changes to the benefit of coastal communities, even if those results show a preponderance of opinions that do not favor offshore wind?

For the sake of transparency, it would be beneficial for the public to understand the Bureau of Ocean Energy Management’s intention – and policy makers, whether within BOEM or not – to use the survey results.

## 5. Survey Timeliness

According to the [ongoing study for BOEM's Environmental Studies Program](#) (PC-22-06; Karen Villatoro), the final report from this survey is due October 18, 2025. WCSPA questions the timeliness of this survey and the transparency of BOEM's planned offshore wind development off Oregon. Two call areas have already been selected; draft Wind Energy Areas (WEAs) are expected in the spring of 2023, with finalization of those WEAs a few months later and a lease auction expected sometime at the end of 2023 or beginning of 2024. Results of this study more than a year after an auction could, at the very least, be moot. Worse, coastal residents' opinions may have changed substantially by that time, as offshore wind development ramps up and more residents become aware of what is happening and they become more informed. Either BOEM should halt the current rush to establish offshore wind off Oregon until it determines coastal residents' preferences through this survey, or the survey and focus group should reflect those intervening changes. At the very least, the survey should acknowledge that development already is under way in the Call Areas off Coos Bay and Brookings; it does not.

In summary, WCSPA's concerns regarding the survey and timing include:

1. The lack of questions pertaining to marine ecosystems;
2. The lack of concern and questions relating to food security;
3. "Birds" used in the general sense in the draft survey;
4. How this information will be used; and
5. The timeliness of the survey relative to ongoing offshore wind development.

Thank you for your consideration of these comments. Please contact me if you have any questions.

Sincerely,



Lori Steele  
Executive Director