



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 Ms. Thomas:

Please accept these comments on “**Resident Perceptions of Offshore Wind Energy Development Off the Oregon Coast**” on behalf of the West Coast Pelagic Conservation Group (WCP). WCP’s present focus is largely based on collaborative research with the Southwest Fisheries Science Center (SWFSC). The members of WCP harvest, process, and market all major species of seafood on the West coast and Alaska and supply quality seafood to America and the World.

**Who we are:** WCP is composed of commercial fishermen and processors from the Pacific Northwest. Many of our members fish off Oregon and our processors primary wild fish operations are on the Oregon Coast. One has a new operation they have invested millions in, located in Charleston Oregon. All of the processing businesses are family operations and they and their employees participate in local community governance and support local organizations such as soccer and baseball leagues for children. The same can be said for our fishermen.

The sustainable fisheries which, by regulation we are allowed to fish in, are governed under the statutes and regulations of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) and the Coastal States which are also under stringent harvest regulatory mandates.

With the advent of COVID-19, providing food supplies for our nation that are sustainable, nutritious, safe, and secure, is of more importance than ever. U.S. produced seafood allows us to create U.S jobs based on the most sustainable harvest practices in the world. U.S. seafood production offsets

the tremendous seafood trade deficit that now exists with those countries that do not practice sustainable management and have no regard for habitat, ecosystems, child labor practices, or the environment. The present prediction for world hunger is that the lack of sufficient supply to feed the world will shrink dramatically in 2023. It is the time to protect and enhance our food supplies-not shut them off.

**Resident Perceptions of Offshore Wind Energy Development Off the Oregon Coast (Survey)** WCP

members have read through the Survey literature that was provided. Not all was easy to find. First, we support and incorporate by reference the sharp critiques offered by the Midwater Trawlers Coop, the Responsible Ocean Development Alliance, and the West Coast Seafood Processors Association.

The wild capture fish industry is a complex and nuanced business that many times requires both instantaneous decisions and long-term planning. Having now spoke with hundreds of fishermen and processors we have not found one that believes offshore wind energy (OSW) development can peacefully coexist with our fishing industry. All believe it will reduce function and feasibility of the industry writ large by a material degree, with many believing OSW will end our heritage and way of life that spans hundreds of years and many generations. Further many are learning about the sloppy practices for environmental review under the “specialized” NEPA precepts the Bureau of Ocean Energy Management (BOEM) states they will administer. To add insult to injury the “streamlining” of the regulatory process BOEM pretends to operate under, will engender further deterioration of the U.S. environmental review process. This will not only destroy a historic industry that helps feed the world, it may create ecological havoc for the California Current Ecosystem food web, and endangered species of sea birds, whales, and salmon. Think in terms of what happened to the salmon runs on the Columbia River when they introduced hydropower, many of which are now extinct.

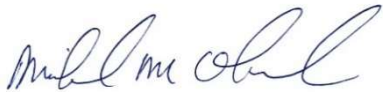
We applaud the NOAA et al effort to do a survey with your stated goals and objectives however we believe the methodology for your Survey may well lead to many biased conclusions. We have several recommendation that would make your survey credible to the fishing community and peer review.

1. The commercial fishing industry represented in your Survey, and since the start of the advent to the push through OSW at any cost with minimal planning, have fallen into a BOEM category of “Other Users”. We strongly resent BOEM et al placing our livelihoods, billions in investments, and cultural heritage and importance in the human food web in a category with surfers and people walking their dogs on the beach, (not that we object to any of these activities).
2. Why not do two surveys one for the how those surveyed view importance of fishing, and the other for OSW? In the “fishermen” survey allow our concerns to reviewed by the coastal residents. This should include the massive fishermen displacement that will happen under OSW development and the unknown ecological effects that no one at NOAA, BOEM, the DOC or DOI worry about. In short why not work with fishermen so we can provide residents with other side of this story?
3. In your Survey you do not ask for how informed those being surveyed are. We believe this is highly relevant and should be analyzed to see how that matches. In this you should also be asking about present employment.
4. We believe that there are segments of the survey that it is difficult to understand how your answer aligns with your question. This may be especially true if the resident taking the survey only has a brief time allowance.

5. We think that the questions should have different answers than “highly important” or similar verbiage. At least some of the answers should be worded in a manner that plainly states the outcome the person taking the survey would make to either accepting or opposing OSW.
6. In the MTC comment Ms. Mann states that there are a huge number of comments by those in the fishing industry stating their opposition to OSW. The reports we receive from BOEM rarely bring this subject up. In fact BOEM stated over and over how they have been working with industry. These comments should be collated and compared to the results of your present survey.
7. Try to insert some information on the cost of OSW at point of sale to the consumer with high estimates to low estimates.
8. Try to assemble a representative portrait of all the issues now confronting OSW I.e., Supply chain issues and shortage of turbine manufacturing centers worldwide to meet the world demands.
9. Try to inform the communities how realistic it is that every community on the coast that loses their fishing fleet will have OSW related jobs to replace that loss.

These comments barely scratch the surface but unless you take WCP and referenced recommendations into account your Survey will miss your targeted goals and your conclusions another line of propaganda for BOEM.

Thank you,  
Sincerely,  
Mike Okoniewski



Secretary WCP  
Mokoniewski.consultant@pacificseafood.com  
360-619-2019

Greg Shaughnessy  
Vice President WCP