Oregon
Tina Kotek, Governor

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Electronic Delivery
October 13, 2023

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

RE: Wind Energy Areas (WEAs)-Commercial Leasing for Wind Power Development on the Oregon Outer Continental Shelf (Docket #: BOEM-2023-0033)

Dear Ms. Thurston-Keller,

Oregon Parks and Recreation Department (OPRD) is submitting the following comments in response to the BOEM comment period on commercial energy development for areas offshore of coastal areas from Coos Bay to Brookings, on the south coast of Oregon. OPRD is the state agency charged with management and permitting decisions for activities on the Ocean Shore State Recreation Area, as specified in Oregon's Beach Laws (ORS 390.605-390.770). It is the policy of the State of Oregon that it is in the public interest to do "whatever is necessary to preserve and protect scenic and recreational use of Oregon's ocean shore (ORS 390.610)." Additionally, OPRD owns and operates over 70 oceanfront state parks along the Oregon coast and houses the State Historic Preservation Office (SHPO). In accordance with OPRD's guiding principles and mission to provide and protect Oregon's special places for the long view, comments will be focused on the following topics: coastal recreation including scenic resources, permitting and cabling, and cultural resources.

Coastal Recreation and Scenic Resources
The recreational enjoyment of the Oregon coast is of vital economic and cultural importance to Oregon and its scenic beauty is a primary contributor to the character of the coastal region and its communities (Swedeen, Batker, Radtke, Boumans and Willer, 2008; Needham, Cramer and Perry, 2013). Oregon's beaches and coastal state parks offer views of the extensive expanses of Oregon's diverse open ocean seascape populated by headlands, islands, and rocks at this land-ocean interface, including the coast-spanning Oregon Islands National Wildlife Refuge. This aesthetic and recreational resource has made the Oregon coast an internationally recognized tourist destination, supporting millions of visits by residents and travelers each year. Oregon's coastline is also unique in that it has over 70 state parks running along the Pacific Coast Scenic Byway, providing "public access and resource protection in a way that is unrivaled by any other U.S. coastline park system (CH2MHill, 1997)."

In 2022, there were an estimated 31.17 million visits to Coastal Region State Park properties, including day-use visitors and campers (OPRD, 2023). Visits to the coast have generally been increasing. Visitors to Oregon State Parks properties spend more than $1.1 billion in the communities located around Oregon State Park properties. The majority of expenditures were for

lodging, gasoline, and food and drinks in restaurants and grocery stores. Because the Coastal Region has the greatest number of visits and slightly higher levels of average spending, the region accounts for about half of Oregon's state park system-wide recreation visitor spending, totaling approximately $619 million (White, 2018). Based on previous surveys of Coastal Region state park visitors, 66% of day-use visitors are Oregon residents and 34% come from outside of the state. Forty-nine percent of overnight visitors are Oregon residents and 51% come from outside of the state (White et. al., 2012).

According to the 2017 Oregon Resident Outdoor Recreation Survey, over half (57%) of Oregon residents participated in ocean beach activities during 2017, with an estimated 23 million annual user occasions (Bergerson, 2018). Ocean beach recreation is consistently in the top list of recreation activities for all demographic groups studied, including minorities and low-income Oregonians. Other types of recreational activities that depend on Oregon's diverse and vibrant coastal ecosystems include tidepooling (~5.5 million user occasions), whale watching (~3.4 million user occasions) and shellfishing/crabbing (~2.9 million user occasions).

Scenic enjoyment is one of the primary recreational activities that visitors engage in at Oregon's coastal beaches (Shelby and Tokarczyk, 2002). The Oregon Coast highway (Pacific Coast Scenic Byway) has been federally recognized by the National Scenic Byways program, established by Congress and administered by the U.S. Department of Transportation's Federal Highway Administration. The highway has a series of viewpoints overlooking unique ocean vistas built into it at various points. In addition to being one of the first Scenic Byways in the country, it has also been designated an "All American Road," which recognizes US 101 as possessing "multiple intrinsic qualities that are nationally significant and have one-of-a-kind features that do not exist elsewhere," including eleven National-Register-listed bridges along its 362 miles. All nine Oregon Coast lighthouses (some dating as early as the 1870s) are listed in the National Register of Historic Places, several of which will likely be impacted in some way by the proposed draft WEAs.

OPRD appreciates that BOEM considered previous comments from the department, and others, and conducted visual simulations of hypothetical wind turbine arrays given the potential for impacts to the viewsheds of the southern Oregon coast. The findings of the visualizations are relatively consistent with previous conclusions, including the BOEM funded study, "Offshore Wind Turbine Visibility and Visual Impact Threshold Distances", which noted that offshore wind facilities "may be visible at distances of 26 mi (42 km) in daytime and 24 mi (39 km) in nighttime views." Studies conducted for "hypothetical projects" for the call areas offshore of New York and California had similar findings with visibility rankings ranging from non-detectable to strongly attracting visual attention at similar distances, depending on conditions.

The entire 362-mile picturesque coastline of Oregon is relatively undeveloped, and large infrastructure offshore will not blend in well. Depending on the location, and the conditions, the size and number of turbine arrays as depicted in the visualizations conducted by BOEM have demonstrated that they will likely be a focus of attention, particularly onshore of the draft Brookings WEA, but also from the draft Coos Bay WEA. Given the sensitivity of state park visitors and the scenic quality of the coastal landscape and seascape at many locations along the coast, OPRD appreciates that a few visualizations were conducted from key viewpoints. Visualizations were done from a variety of distances from the draft WEAs, ranging from Heceta Head State Lighthouse Scenic Viewpoint (46.34 miles to the Coos Bay WEA) to Cape Ferrelo within the Samuel H. Boardman State Scenic Corridor (20.71 miles to the Brookings WEA). The hypothetical arrays in the draft WEAs were visible *from all these sites*, regardless of the distance. More visualizations are needed and should be conducted as soon as possible along with additional analysis of the potential impacts,

to inform planning. There are many more highly visited state parks that extend up and down the entire southern coastline that are destinations for their scenic beauty, cultural history, proximity to the ocean and the remote, rugged character of the coastal landscape. These include, for example, Cape Sebastian State Scenic Corridor and Pistol River State Scenic Viewpoint, both sites designated specifically to provide and protect opportunities for sight-seeing and scenic enjoyment (OPRD, 1995). There are multiple key viewing areas within coastal parks that are considered Traditional Cultural Places (TCPs) and Traditional Cultural Landscapes (TCLs) by Oregon's Tribes along with many listed in the National Register.

Nighttime views, especially from undeveloped sections of the south coast between Brookings and Coos Bay currently have relatively low levels of light pollution. These are rugged, wild places where visitors go to enjoy nature, sunsets, dark skies, and seascapes unmarred by human development. Night sky photography (i.e.., astrophotography) and stargazing are popular in these areas, as there are few coastal areas without significant development that afford the low levels of light necessary for these endeavors. The Oregon Islands National Wildlife Refuge, a prominent element of the seascape between the coast and the WEAs, is noted in a national list of 16 top public lands in the United States for enjoyment of truly dark skies (Department of Interior, 2023). Additionally, sunset viewing occurs every evening along informal highway pull-outs and state parks along the entire central and southern Oregon coast. Only two visualizations (Umpqua Lighthouse and Harris Beach) include this time of day to estimate potential impacts. From what is depicted in the timelapse videos, visibility is pronounced at sunset.

The viewshed of parks classified in the highest category of visual resource protection standards in Oregon's Territorial Sea Plan (TSP) maintain a standard that allows for "level[s] of change to the characteristic seascape" that are "very low and may not attract attention" (OPAC, 2013). For several of the Key Observation Viewpoints, it is not clear if this standard will be met given the information currently available. An inventory of 144 scenic ocean viewsheds delineated and incorporated into the Territorial Sea Plan Part Five along with the standards within the TSP should be considered in this planning phase (OPAC, 2013).

Additional visualizations and analysis, like what was done in the above referenced studies, should occur from additional key viewpoints identified in Oregon's TSP located on public beaches, adjacent to historic resources, key overlooks, designated scenic areas and areas identified by Oregon's tribes. Analysis should include a review of the standards in the TSP to determine potential inconsistencies. OPRD staff would be happy to assist BOEM in identification of additional sites to conduct simulations, including additional 24-hour modeling efforts to illustrate changes over all times of day since only two were done with this level of detail to-date.

Permitting, cabling and onshore infrastructure

Under ORS 390.640 and ORS 390.715, any person conducting an ocean shore alteration, or placing any pipeline, cable line, or other conduit over, across or under the state recreation area or submerged lands adjoining the ocean shore, must submit an "Ocean Shore Alteration Permit" application to OPRD. Review of cable landing sites in the ocean shore alteration permit process requires avoidance and minimization of impacts to resources. An alternatives analysis needs to demonstrate that options with the least impact are considered.

If approved, consideration of the locations where these offshore projects would ultimately land onshore are critical to the successful planning of offshore wind energy areas. The planning process has not given any weight to considering the effects power transmission lines and other infrastructure

have on recreation, scenic, cultural, historical and environmental resources when they cross from offshore to onshore sites. BOEM has communicated that cabling and onshore connectivity is outside the scope of the agency's mission, however, leaving that part of the planning to later phases of development is highly problematic as it vastly reduces the potential for minimizing these conflicts before actual projects are proposed and options are limited. The enforceable policies in Oregon's Territorial Sea Plan, including relatively stringent ones for rocky habitats should also be considered (OPAC, 2023).

BOEM has projected a "worst-case" scenario for up to ten cables per GW (based on information provided at the September Task Force meeting), which could mean as many as eight cables for the draft Coos Bay WEA and 19 cables for the draft Brookings WEA. To put this into perspective, Oregon has fewer than 20 cables coastwide, and these have been installed over several decades, primarily along the northern coast. The suitable areas available for cable routes and landings on the south coast, which are likely limited, should be evaluated as soon as possible to avoid sensitive resources (both off and onshore), *prior to* finalizing the WEAs.

Cultural resources
OPRD recommends that on-going meaningful consultation continues with the effected Tribes, including the Confederated Tribes of Grand Ronde, Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indian, the Coquille Indian Tribe, Confederated Tribes of Warm Springs, Cow Creek Band of Umpqua Tribe of Indians and the Confederated Tribes of Siletz, occur to assure that Traditional Cultural Properties and Landscapes are identified and efforts are made to assure that these important cultural resources are protected.

In summary:
- To minimize conflicts with scenic seascapes, particularly those called out in the TSP as "special area viewsheds", prioritize areas as far offshore as possible. Viewsheds are protected resources and will be subject to Federal Consistency review. BOEM should evaluate options outside of the existing draft WEAs, as necessary, to minimize the impact these structures will otherwise have on arguably one of Oregon's most special of places, the south coast.
- Conduct additional visualizations and analysis of the impacts of the proposed WEAs on viewsheds as soon as possible, to inform planning and selection of WEAs.
- Incorporate planning for cabling and onshore infrastructure as soon as possible, prior to finalization of the WEAs.
- Conduct meaningful consultation with Oregon's Federally recognized Tribes.

Thank you for your time and the opportunity to comment. Please feel free to contact me with any questions.

Sincerely,

Matt Rippee
Matt Rippee (Oct 13, 2023 13:44 PDT)
Matt Rippee
Associate Director

Cc (via electronic mail):
Lisa Sumption, Director; Chris Havel, Associate Director; Dennis Comfort, Coast Region Director
Chris Parkins, Central Resources Manager; Laurel Hillmann, Ocean Shore Resource Coordinator

Citations:

Bergerson, T. 2018. 2017 Oregon Resident Outdoor Recreation Survey. 2018-2022 Oregon Statewide Comprehensive Outdoor Recreation Plan Supporting Documentation. Oregon Parks and Recreation Department. 216 pages.

CH2MHill, 1997. Pacific Coast Scenic Byway Corridor Management Plan for U.S. 101 in Oregon. Prepared for Coastal Policy Advisory Committee on Transportation (CPACT) and the Oregon Department of Transportation by CH2MHill and associated firms: Jeanne Lawson Associates, Jones & Jones, The Mandala Agency, Parametrix, Vanasse Hangen Brustlin, W&H Pacific. December 1997. 164 pp.

Department of Interior. 2023. Twinkle, twinkle! 16 Awesome Public Lands for Stargazing. https://www.doi.gov/blog/twinkle-twinkle-16-awesome-public-lands-stargazing.

Needham, M. D., Cramer, L. A., & Perry, E. E. 2013. *Coastal resident perceptions of marine reserves in Oregon.* Final project report for Oregon Department of Fish and Wildlife (ODFW). Corvallis, OR: Oregon State University, Department of Forest Ecosystems and Society; and the Natural Resources, Tourism, and Recreation Studies Lab.

Ocean Policy Advisory Council (OPAC). 2013. Oregon Territorial Sea Plan, Part Five. Available online at: oregon.gov/lcd/ocmp/Pages/Ocean_TSP

Oregon Parks and Recreation Department (OPRD). 2023. Day-use and overnight camping visitation estimates for coastal region state parks based on automated parking lot counters and camping reservation numbers. Generated by the Oregon Parks and Recreation Department. Updated February 2023.

Shelby, B. and Tokarczyk, J. 2002. Oregon Shore Recreational Use Study. Report prepared for Oregon Parks and Recreation Department. Available online at: oregon.gov/oprd/PLANS/docs/scorp/.../ocean_shore_recreational_use_study.pdf

Sullivan, R., Kirchler, L., Cothren, J., & Winters, S. 2013. Offshore Wind Turbine Visibility and Visual Impact Threshold Distances. *Environmental Practice, 15*(1), 33-49.

Swedeen, P., D. Batker, H. Radtke, R. Boumans, C. Willer. 2008. An Ecological Economics Approach to Understanding Oregon's Coastal Economy and Environment. Audubon Society of Portland. Portland, OR.

White, E.M., Goodding, D. and R.S. Rosenberger. OSU. 2012. Spending and Economic Activity from Recreation at Oregon State Park Units-Coastal Region and Milo McIver State Park, an update. Available online at: oregon.gov/oprd/PLANS/docs/scorp/2013-2018_SCORP/Spending_Economic_Activity_Coastal_Region_Milo_McIver.pdf

White, E.M. 2018. Economic Activity from Recreation use of Oregon State Park Properties-System Report. Report developed for Oregon Parks and Recreation Department. Available online at: oregon.gov/oprd/PLANS/docs/scorp/2013-2018_SCORP/EconomicActivityRecreationOregonStateParksSystemReport.pdf