

Jean Thurston-Keller

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

Dear Ms. Thurston-Keller:

I am a Tribal citizen of the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians. As a Tribal citizen, I have serious concerns with BOEM moving forward without detailed understanding of how they will address adverse impacts to cultural sites, usual and accustomed places, traditional resources, religious practices, and other ceremonial uses. Thus far, BOEM has not provided avoidance or mitigation for these impacts. Our religious beliefs, traditional practices, fishing, first foods and relations are interconnected and influenced by all that is encompassed in the greater Ocean and the rivers that empty into it.

This claim honors our obligations to uphold our sovereignty, perpetuate our unique cultural identity, and promote the intergenerational transference of knowledge. Furthermore, this claim extends to the stewardship of our ancestral homelands to perpetuate and promote our way of life and resources for future generations. This claim also includes *Q'alya ta Kukwis shichdii me*, a Traditional Cultural Property ("TCP") located in Coos Bay comprised of the estuary features and adjacent shoreline resources that have been recognized by the Oregon State Advisory Committee on Historic Preservation, as well as three federal agencies as eligible for listing on the National Register for Historic Preservation ("NRHP" or "National Register").

From our traditional diet to our travel, beliefs, art, and technologies, the Ocean and estuaries have sustained us and defined who we are as Indigenous people. The unique landscape, places of cultural and religious significance, viewsheds and traditional resources of our Ocean and bays, upland dunes, forests, archaeological features, cultural resources, and first foods connect us to our Tribal ancestors. Our homelands and Ocean have been the foundation of our way of life since time immemorial and remains a cornerstone of our Tribe to this day.

Subsistence and commerce fishing was ubiquitous among the various villages and Tribes of the CTCLUSI. Commercial fishing is not common today among Tribal citizens because these resources have been repeatedly exploited over the last 160 years, resulting in gradual reduction of once abundant fishes and listing of some species.

This project will exasperate this issue by building these Floating Offshore Wind Arrays in critical offshore habitat areas and limiting our ability to fish our usual and accustomed places. I also expect that the construction, operation and decommissioning of these Floating Offshore Wind Arrays will have adverse impacts to the Tribe that include, but are not limited to:

- Reduction or loss of access to local fresh seafoods. The first foods of my Tribe are predominately seafoods- from crabs, shrimp, clams, salmon, lamprey, rockfish, tuna, herring, halibut, seal and whale, most of which are still part of our diets today. When citizen members cannot fish, crab or clam, they often purchase these foods locally. If they are unavailable, this will affect the health, wellbeing and culture of our Tribe, fracturing our relationship to Coos Bay and other areas in and adjacent to our homelands for generations.

- There are potential employment or business opportunity and loss. The citizens of CTCLUSI will no longer have the opportunity to commercial or subsistence fish. Our ancestors fished for their livelihoods, and while this is less common today, any further costs or access or impacts to fisheries may devastate this opportunity for generations. My ancestors and Tribe are already familiar with this type of loss and will not support the continuation of loss of our lifeways and livelihoods.

I am concerned with these additional issues:

- Important habitat areas should be excluded from any call areas.
- Earthquake and tsunami impacts to offshore wind development need further study.
- Impacts of offshore shore wind on coastal economies, including future potential economic opportunities lost (fisheries, recreation, tourism, etc.).

Many plants, shellfish, mammals (sea otter, sea lion, seal for example) and fish remain important first foods of the Tribe and it is very important to me that Tribal citizens continue to be able to subsist on these foods as well as allow for economic opportunities for the Tribe and its individual citizens.

We continue to be stewards and caretakers of the lands and resources that were once managed by our ancestors; including the Ocean, lands and inland waters that would be impacted if a WEA or lease are finalized without meaningful consultation and consideration of impacts to these lands and resources.

This letter requests avoidance of impacts to cultural resources in the Ocean and rivers of / within our ancestral territory (Southern Coast of Oregon) as well as to resources from associated infrastructure, transmission or construction needs from WEA's and from Offshore wind energy development (construction, operation, and decommissioning).

I am asking BOEM to exclude the entire or substantial portions of the Coos Bay Call to address adverse impacts to traditional cultural areas, features or resources, via avoidance or mitigation. We are also asking BOEM to avoid or mitigate impacts, related to transmission and access needs for construction, operation and decommissioning that will occur as a result of this project within or adjacent to our ancestral homelands. Moreover, we request exclusion of areas that would result in impact to these resources. Important cultural sites include Heceta Head, Cape Blanco, Cape Perpetua, Shore Acres, Baldicha (Gregory Point), Yokum Point, Blue Ridge, and Gardiner Hill as well as sites included in *Q'alya ta Kukwis Shichdii me*.

I ask BOEM to locate turbines in locations that afford the greatest protection of fisheries, species listed or threatened endangered species act ("ESA"), and cultural and natural resources of traditional significance to CTCLUSI's identity, lifeways, and viewsheds. We ask that the project adequately assess the economic benefits as well as the ecological and social benefits/burdens of a Floating Offshore Wind Array.

Name, Print

Signature

Date