



CITY OF ASTORIA  
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6/22/2022

Dr. Whitney Hauer,  
Renewable Energy Specialist Bureau of Ocean Energy Management  
Office of Strategic Resources 760 Paseo Camarillo (Suite 102)  
Camarillo, California 93010

RE: Call for Information and Nominations to assess commercial interest on potential wind energy leasing activities in federal waters off the coast of Oregon

Dear Dr. Hauer:

The Bureau of Ocean Energy Management has published a Call for Information and Nominations (Call) to assess commercial interest in, and obtain public input on, potential wind energy leasing activities in federal waters off the coast of Oregon. Publication of the Call in the Federal Register initiated a 60-day public comment period which ends at 11:59 p.m. ET on Tuesday, June 28, 2022. On June 20, 2022, the City of Astoria City Council unanimously adopted Resolution No 22-20 directing the Mayor to convey concerns about the process that will be used to consider environmental and economic impacts of leasing offshore lands for wind generation.

City of Astoria recognizes that offshore wind energy could be an important part of our state and nation's clean energy portfolio, and help reduce dependency on fossil fuels. We also greatly value our commercial and recreational fishing fleets for both their economic and cultural contributions to the city, county, and the state. The city, port and private businesses have made significant contributions to commercial fishing infrastructure to help retain our commercial and recreational fishing businesses. The City of Astoria is home to several seafood processing plants, marinas, two boat repair yards, a very large marine supply store, and a large assortment of workers engaged in direct and indirect support of the commercial fishing industry

The City also values collaborative processes to balance the interest of all stakeholders prior to making decisions that may have critical impacts on the environment and economic resources.

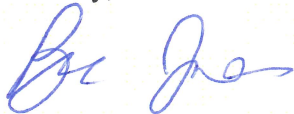
The City Council requests the following considerations be taken to ensure that existing ocean users, stakeholders, and the marine environment are protected prior to offering leases for offshore wind energy, with the following recommendations:

1. Ensure the development process requires state and federal agencies to be transparent about the process of identifying and implementing offshore wind developments by embracing the "Oregon Way" public process that includes the Oregon fishing industry, environmentalists, coastal communities, and our state and federal political and congressional delegations. These stakeholders need a seat at the table to sit down with BOEM as equal partners, develop a marine spatial planning process with authentic discussions, conduct the requisite EIS analysis, the real costs and benefits, evaluate test sites, and develop a rational decision that minimize costs and maximize benefits to Oregon and the nation.

2. Pending results of a comprehensive marine spatial plan, move the Call areas outside of highly productive commercial fishing areas. Data would likely show that moving outside of 1,300 meters will avoid the majority of fishing activity. These fisheries have great importance to Clatsop County and Oregon's economies.
3. Invest in better data sets to understand potential impacts of the marine environment. There are still important questions that need to be understand such as impacts to already endangered marine birds, marine mammals, and to economically important species. In the meantime, enact a moratorium on developing large scale projects until impacts can be better understood.
4. Provide information on potential environmental and economic impacts upfront, at the beginning of the process, rather than after leases have been granted. This may require conducting a comprehensive Environmental Impact Statement before leases are granted, rather than after. This would include information on cumulative impacts on projects proposed in other West Coast states, as well as transmission line impacts.
5. In the absence of a comprehensive peer reviewed economic analysis (as part of an EIS), there is no real understanding of the potential economic impacts to coastal communities and the state of Oregon, and relevant tradeoffs. If we assumed that the Call areas were completely developed, the loss of Oregon fishing revenues may total 10-20% or more of today's value. That would equate to an annual loss of \$18-\$35 million in ex-vessel value and \$45-\$90 million in local and state household income. Over thirty years (the equivalent of the life expectancy of a windmill) that would equate to the loss of more than a \$500 million to \$1 billion in ex-vessel value and \$1.4 to \$2.7 billion in household income.
6. Given the considerable fishery values generated from the Call areas, the productivity of the California Current System, and the potential impacts to marine species and ecosystems/habitats, the process should be slowed down because of significant risks and uncertainties.
7. Consider a full-scale demonstration site, similar to PacWave, but designed for full size floating wind devices. This could be a critical step in better understanding the potential impacts we mention above. Full size floating offshore wind devices do not currently exist in operation in the United States, and is limited in its operation outside of the U.S. Proving that the technology can survive here, and understanding its impacts would allow for more informed development in the future.

Thank you for providing an opportunity to comment on these critical issues impacting the State of Oregon.

Sincerely,



Bruce Jones  
Mayor, City of Astoria