June 22th, 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: Recommendations for Potential Offshore Wind Energy Development

The City of Warrenton recognizes that offshore wind energy may be an important component to our state’s transition to cleaner energy. We value the commercial and recreational fishing fleets and recognize their significant economic contributions to the national, state, regional, and local economy. Warrenton’s commercial fishing, recreational fishing, seafood processing and boat building, are industries that are culturally significant for Warrenton and the region and offer opportunities for citizens and visitors alike. The City 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 of Warrenton believe certain steps should be taken to ensure that existing ocean users and stakeholders are protected in the process of offshore wind energy development with the following recommendations:

1. The development process require state and federal agencies 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, sit down with BOEM as equal partners, develop a rational process with authentic discussion, conduct the requisite EIS analysis, analyze the real cost and benefits, evaluate test sites, and develop a rational decision that minimize costs and maximize benefits to Oregon and the nation.

2. Pending the results of a comprehensive marine spatial plan, move all Oregon Call Areas outside of 1,300 meters to avoid displacing current sustainable fishery activities. These fisheries have great importance to Clatsop County and Oregon’s economies.

3. Enact a moratorium on developing large scale wind turbine farms until all the risks to marine mammals, sea birds, fisheries and the marine environment are clearly understood.

4. Meet all NEPA requirements and conduct a comprehensive programmatic EIS before leases are granted instead of at the end of the BOEM process. This includes cumulative impacts and transmission line impacts. Include an analysis of the transmission lines that will bring the energy to shore and examine the cumulative impacts to current ocean users from adjacent wind energy developments in Northern California and Washington.
5. In the absence of a comprehensive peer reviewed economic analysis (as part of an EIS) there is not real understanding of the potential economic impacts to coastal communities and the state of Oregon, and relevant tradeoffs. If we assumed that the Oregon Call Areas were completely developed for wind energy, then 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 $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 the marine species and ecosystems/habitats, the process should be slowed down given significant risks and uncertainties.

7. Consider a demonstration site, similar to PacWave, to test offshore wind technology. Floating offshore wind does not currently exist in operation in the United States, and it is unclear whether the technology can withstand the harsh elements of the Pacific Ocean.

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

Sincerely,

Henry A. Balensifer, III
Mayor, City of Warrenton, Oregon

cc: Warrenton City Commission
Linda Engbretson, Warrenton City Manager
Lori Steele, Executive Director of West Coast Seafood Processors Association
Jason Sierman, Senior Policy Analyst for Oregon Department of Energy

"Making a difference through excellence of service"