

TSPWG
05/10/11
Newport, OR

Public Comment

#1

Demian Bailey, Oceanographer, “There are big things happening globally that should inform this process: peak production of oil has been reached and CO² levels are rising. I come from the oil spill response world and the oil and natural gas industry and they are moving on relentlessly and their power is immense. What we are talking about is a renewable energy source that the rest of the world is moving ahead on. The Oregon coast is one of the most uniquely situated places in the world for this. As you move forward, while keeping goal 19 in mind, I urge you to keep the hand wringing to a minimum. There will be impacts and the Hippocratic Oath should not apply. There will be some harm, but it’s far less than what is happening around the globe.”

#2

Ben Enticknap, Oceana, Pacific Project Manager “I believe that maintaining ocean ecosystems, sustainable ocean fisheries, and renewable energy is achievable. Critical to this is Goal 19 implementation requirements including protecting living marine resources, biological diversity, and functional integrity. I’m encouraged by the sophisticated and technical approach that the state is taking. I support the criteria and the data sets you are using to identify important ecological areas. Oceana has been working with the marine reserve process to collect and analyze physical and biological data to identify [31 important ecological areas, which we are presenting to you as public information](#). I think that it’s important to bring some of the missing datasets online, including a soft coral data set from the NOAA trawl survey. We also acknowledge that there are issues with data that span the entire Oregon coast, like green sturgeon critical habitat and whale migration corridors. The first step is to identify those important ecological areas based on the discreet spatial information and then to monitor and take a close look at specific areas where energy siting may occur and determine that you don’t have an adverse effect or significantly alter the habitat. Ultimately, what we are asking is for the state to identify these important ecological areas, using the data you have now. Don’t wait to designate areas because we don’t have complete data. But please maintain and strengthen the adaptive management framework, so in 5-10 years, when you do have more information, you can alter those boundaries.”

#3

Peg Reagan, Conservation Leaders Network, Gold Beach, “ I wanted to bring your attention to a 1990 aerial whale migration survey of the entire Oregon coast on both the north bound and south bound routes that year. We have to use the precautionary principle, and if there is not a suitable place outside of the whale migration routes, in the territorial sea, then I don’t think we should do it. What guarantees are there that these facilities will create and overall benefit to Oregon?”

#4

Gus Gates, Surfrider Foundation, "My concerns about which recreational fishing areas have been included in the fishing effort maps have been clarified. Also, I wanted to wish Karen Braby a Happy Birthday!"

#5

Rick Williams, Oregon Wave Energy Trust, "I live in Oregon City, Oregon and I've spent 25 years at sea as a sea captain, submariner, salvage diver, and commercial diver. I'm on the board of the Oregon Wave Energy Trust (OWET) and recently the board held a vote and we approved unanimously that OWET supports and endorses the TSP process and we commend your effort.

As a member of industry and a chair of the OWET industry advisory group, while there are a range of different wave energy technologies and devices, common to all of them is the need to get out to the site and back in a cost effective and efficient manner as well as to get power from the site to the grid in the a cost effective manner. Just as OWET helped to fund the fishing effort mapping, we are going to industry and asking them what are their needs and what do they think is important for development.

In my opinion as an ocean engineer, we need to be close to a deepwater port. The devices and ships draw 20-30 feet of water. We need to be able to get underway at first light regardless of tide and get out to the site and back without having to pay overtime. This puts a radius on the area that we can be located from the support port that is cost effective. It also makes your employees happy if they can get home at night without having to stay out too long. Early stage technologies are going to be monitored, maintained, and brought in more frequently. Closer is better for early stage technology. Its going to be a while before any revenue is generated. If cables cost \$1 million a mile, there is a big difference between 5-10 miles to a demonstration site and 20-30 miles to the demonstration site. Please evaluate cable corridors; there are only a few places where you can effectively bring a submarine cable ashore. It is OWET's plan to provide TSPWG with the industry needs during this process, similar to the survey process fishing groups went through. In summary, reasonably close to a deep water port, reasonably close to a grid connection and a cable route, and most devices will be used in about 50-70 meters because that is where the resources is not impacted by the bottom interaction.

As an Oregonian, we talk about the things we don't want. We don't want nuclear, we don't want coal, and we don't want fossil fuels. At some point we have to decide what we do want. What we stand for. We stand for a renewable portfolio standard. We stand for responsible renewable energy development.

Finally, we need to identify locations for long term commercial full scale wave energy facilities, presuming it can be done responsibly. Between the NMREC test site, which is non grid connected research site and the long term commercial site, there is a journey. In that journey, there is a 10 year close in, close to the grid, able to be monitored demonstration site, for a couple handfuls of devices. We need to be able to take a device out, prove that it works, do a phased implementation, enough so that you're generating

revenue. We can then reuse that cable by connecting to it and extending it out into deeper water or a more favorable location. The problem with the Federal Energy Regulatory Commission pilot project guidelines is that it sounds like industry will have to remove everything. We need to be able to recognize the millions of dollars that go into a demonstration site and leverage that investment. That's the way that the industry will develop. We need to start with those demonstration sites that are more favorable economically. A demonstration site that is 1 nm², 2nm by .5 nm, would be very useful at this stage. Additionally, if we could be allowed to use anchoring devices such as suction plate technologies that would allow us to effectively remove the mass. This is something that we need to have a conversation about."

#6

Bob Eder, Commercial Fisherman, OWET, co chair FISHCRED, "I want to remind you about the \$60,000 dollar question. First off, you have the support of the fishing industry in your work. It's not lost on us that Goal 19 protects us and we value that. Even though you take in all this quantitative information, your work will be judged on quality, not on quantity. I've heard that the wave energy industry is in its nascent stage, is pre nascent a word? We are doing a lot of work for a technology that doesn't exist in a usable form. I'm not saying it should not or that it will not, it just does not. As such I question how much territory you really need to set aside for this right now. Please consider this, because we've heard all day about the things that do exist in the ocean right now. I've heard you can get 100MW from one square mile; we don't need that many miles to demonstrate this technology. We can get the demonstration and then maybe move into the next phase where we will need some space. I'm in a production business, we measure our accomplishment by how much we produce. Don't get sucked into that trap with this kind of plan."