



KATE BROWN
Governor

January 13, 2022

Mr. Douglas Boren
Pacific Regional Director
Bureau of Ocean Energy Management
US Department of the Interior
Pacific OCS Region
760 Paseo Camarillo
Camarillo, CA 93010

Dear Director Boren:

Secretary Haaland's October announcement of the Department of Interior's intent to announce an Oregon Wind Energy Area during 2022 is encouraging and matches well with the State of Oregon's commitments to seek to rapidly and aggressively move towards a 100% renewable energy future. Legislation I recently signed, stated: "It is the goal of this state to plan for the development of up to three gigawatts of floating offshore wind energy projects within the federal waters off the Oregon coast by 2030."

The many contributions from state agencies, local governments, and interested parties will ensure that the BOEM process successfully finds the best outcome for this process. The results of that collaborative work, including the creation of the OROWIND Map, are already substantial and we look forward to further progress over the coming months and years. Outreach to the federally recognized tribal nations should continue to be a strong focus of the effort.

There is a long history of ocean planning in Oregon, based on the foundational principles of Statewide Land Use Planning Goal 19, the Ocean Resources Goal. Under Goal 19, we seek to explore beneficial uses of the ocean while also preserving multiple conservation goals. A state policy framework has been developed for Marine Renewable Energy and those policies will provide a framework for the State's Coastal Zone Management Act Federal Consistency Review activities associated with OSW development. We anticipate that early consideration of the goals of the State's land use planning program and the role of local governments in the components of the project that will occur onshore, and in our estuaries, will be helpful in the later stages of the process when those local land use decisions are made.

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More specifically, as BOEM moves toward establishing call areas, please consider the following principles:

- Prioritize the identification of Call Area(s) with the highest potential for commercial viability and the highest potential for achieving the most efficient use of limited ocean area as possible. This includes consideration of areas with the highest wind energy potential and areas that could provide relatively lower-cost transmission options to interconnect and deliver energy into Oregon's existing onshore power grid. For example, BOEM could consider identifying multiple call areas relatively proximate to at least two of the five interconnection points examined in the 2021 NREL study "Evaluating the Grid Impact of Oregon Offshore Wind."
- Establish Call Area(s) of sufficient size and flexibility to allow for further refinement and avoidance of conflicts as Wind Energy Areas are defined.
- This may be an opportune moment for establishing Call Areas that provide the flexibility for the potential use of waters beyond 1300-meter depth that could be technically and financially viable for development in the near or distant future.
- Exclude from Call Areas waters within 12 nm of shoreline (nearshore). The nearshore has the potential for the most intense conflicts with human uses and multiple protected species.
- Work with the State on the definition of rock reef habitat, which should be excluded from consideration for inclusion in any Wind Energy Area.
- Wind Energy Areas should also be defined with consideration of likely and feasible cable routing and environmentally sensitive areas.
- Continue work with agencies and stakeholders to "avoid, minimize, and mitigate" natural resource impacts prior to the proposal of Wind Energy Areas.
- A finer level of detailed analysis may elucidate unacceptable impacts to fisheries that are in addition to the "highest use areas" for fishing that much of the early mapping has focused on.

My office and our impacted agencies look forward to further collaboration with BOEM and the Task Force.

Sincerely,

A handwritten signature in black ink, appearing to read "Kate Brown", with a long horizontal flourish extending to the right.

Governor Kate Brown

KB:AS,AC