



April 27, 2026

Department of Land Conservation and Development
State of Oregon
Public Comments RE: Oregon Offshore Wind Energy Roadmap Draft

Renewable Northwest (RNW) is a 501c(3) nonprofit organization that advocates for the decarbonization of the electricity grid across Oregon, Washington, Idaho, and Montana. We are a membership-based organization, and our members include clean energy developers, related businesses, and other nonprofit organizations. Prior to 2025, our membership included offshore wind (OSW) developers and we were very actively engaged in OSW advocacy across Oregon and Washington. We continue to track and monitor West Coast OSW activity in our region and support its development.

RNW appreciates the opportunity to provide commentary on the Oregon Offshore Wind Energy Roadmap Draft. As one of the leading stakeholders involved in creation of HB 4080 that mandated the writing of this Roadmap, we want to ensure that the final product steers as close as possible to what was envisioned when the legislature authorized it. Despite current federal headwinds opposing offshore wind, this generation resource will be critical to meeting our region's growing energy demand with renewable electricity, and Oregon's Roadmap should send a clear market signal about the state's readiness to invest in this long-term infrastructure.

We recognize that the Roadmap is not intended to indicate any specific outcome regarding the development of offshore wind. However, there are certain factual realities regarding Oregon's electricity needs and the market realities of attracting future development on which we would like to offer commentary. Regional electricity demand is expected to increase by approximately 30% over the next decade, according to the 2026 [Northwest Regional Forecast](#), and resource development is not keeping up with projected load growth. Floating offshore wind is an attractive emerging technology resource and can particularly help meet projected winter peak demand, but it requires careful planning and investment from the host state to make it a reality. RNW is concerned that the direction of the Roadmap could steer potential investors and developers away from Oregon if too many added costs are required and rule out OSW as a potential energy resource for Oregon in the future.

Section 5.2: Identified Policy Gaps and Opportunities

Overall, RNW urges caution with the draft's framing that "the state's policies may not cover every possible effect" when it comes to protection of coastal resources. Oregon's existing Enforceable

Policies are among the strongest in the country, and additional new layers of environmental policy may become so burdensome that offshore wind developers choose not to develop in this state. The suggestions laid out in Table 5-1 are extensive. Additionally, the gap analysis fails to consider potential effects of *inaction* of building this needed renewable generation source.

RNW agrees that better tribal engagement processes are needed in order for OSW development to be a success, and that the state should coordinate with the federal government to that effect.

Adding new environmental policies, while well-intended, could further disincentivize OSW development. New generation resources are desperately needed, and unevenly adding new requirements to only OSW would serve to make new natural gas plants and other emitting resources more appealing from an investment standpoint. While other states like [California](#) are rationalizing their state environmental laws to ensure clean energy development can keep pace with rising demand, Oregon would be sending a negative market signal to OSW developers with this approach.

Section 6.2: Achieve State Energy and Climate Policy Objectives

RNW appreciates that the Draft Roadmap pays close attention to the role that floating OSW can play in achieving state energy and climate policy objectives. However, we have some concerns regarding some of the framing laid out throughout the section. The green call-out box at the top of this section seems to have a clear anti-OSW bias as it lays out challenges that face Oregon's energy infrastructure "regardless of whether turbines are built off Oregon's coast." This is unhelpful, as there are few other non-emitting generation resources capable of meeting Oregon's growing energy needs at the scale of OSW; RNW sees OSW generation itself as essential to the region's clean energy transition.

We agree with the suggestion in section 6.2.1.1 to pursue regional power market opportunities and transmission planning related to OSW energy. Section 6.2.1.2 suggests addressing transboundary energy issues and opportunities with California, Washington, and other Western states, stating that OSW developed off of Oregon's coast may be consumed in California rather than Oregon, and that Oregon should address how the costs and benefits of OSW development can be shared equitably and support affordability in Oregon. This is perhaps a misunderstanding of how regional power markets work, and an oversimplification of the behavior of electricity. More electrons on the grid improve resilience and reliability for all. Additionally, greater connectivity with California would allow Oregonians to benefit from renewable energy resources being built at speed in California, like solar + battery storage. The goal of a larger energy market is to make diverse renewable energy resources available to the load to ensure a reliable and economic grid - something from which we would all benefit.

Section 6.2.2 contains several good ideas, as well as some that may warrant further discussion. Section 6.2.2.1 suggests supporting investments and planning for grid infrastructure upgrades to

increase resilience and facilitate new energy options, an action that RNW strongly supports. We also firmly agree with the portion of section 6.2.2.2 that points out that OSW is a large capital investment and requires a long lead time, and that the Oregon Economic Development Strategy and Oregon Energy Strategy ought to be aligned to reflect this. This section also suggests that state procurement targets could be helpful or worth exploring, but does not make a recommendation; we agree with not recommending a procurement mandate at this time. We agree with recommendation 6.2.3.1 to continue to refine the Oregon Energy Strategy to potentially include offshore wind, when appropriate as market conditions change.

General Discussion

Oregon's October 2024 offshore wind lease sale failed for several reasons. General feedback from the development community was that investors backed away due to election uncertainty, lack of political interest and leadership from the state of Oregon, stakeholder pushback, and a general lack of market signals from the state. While Oregonians cannot control actions at the federal level, the state can conduct its own preparations: however, this Roadmap draft may be sending the wrong market signals. This document indicates that the state is going to require additional permitting and siting work, which will add additional costs, timelines, and uncertainty into development costs. In contrast, Washington is conducting a full OSW supply chain, port, vessel, and workforce analysis for the state under different development scenarios, indicating a higher level of seriousness to potential investors.

If Oregon does not want to develop offshore wind, that is a valid choice. However, Oregonians should be aware that rising demand will necessitate additional resources being added to the grid, and RNW would strongly prefer that the majority of those resources be renewable and be based in Oregon to benefit Oregonians to the extent practicable, as required by HB 2021.

Sincerely,

Casey MacLean
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Renewable Northwest