



Offshore Wind Energy Roadmap Roundtable: Summary of Comments & Response: September 2025, Roadmap Draft 1 Last updated November 10, 2025

i. Context

In September 2025, DLCD shared a complete draft of the Roadmap with the Roundtable. The draft was discussed at the September 2025 meeting with comments and feedback invited. This document summarizes some of those comments and how they were incorporated into the November, 2025 complete draft #2 of the Roadmap document.

The following sections are organized by Section of the document.

ii. Executive Summary

Overall, commenters suggested shortening the Executive Summary and gearing it primarily to a legislative audience. In response, DLCD:

- Removed Alternative Futures and Pathways diagrams
- Shortened language in the Recommended Actions & Policy gaps table

One commenter wanted to highlight calls for A) a cumulative effects analysis, B) as early a description of the whole FOSW project as possible, so they can be adjusted or not move forward before it's too late, and C) access to the federal data important to guiding decisions. In response, DLCD:

- Offered a starter list of key messages for policymakers to include up front in the Executive Summary for discussion at the Roundtable meeting.

I. Section 1: Background & Introduction

Several commenters suggested moving large portions of the Background into an Appendix. In response DLCD:

- Moved large portions of A) the current status of FOSW, and B) the roles of different federal and state agencies to an appendix. Updated the list of current OSW projects;
- Moved the portions of Section 3 related to identifying effects by objective area into the Enforceable Policy Assessment appendix, focusing on just the gap summary table in the main body of the document. Roundtable feedback would be helpful on whether this

organization maintains enough focus on the perspectives and interests of different communities and objective areas.

Several commenters asked for a Glossary and List of Acronyms. DLCD:

- Added a Glossary and List of Acronyms but also tried to avoid acronyms wherever possible.
- Added terms to the Glossary, including: climate justice, environmental justice, just transition, and varying types of community agreements
- Added citations in several places.

Commenters also highlighted some specific things. One asked for more background on the co-location of energy storage with wind generation (hydrogen, battery, etc.). Another suggested citing to Gov Brown's request for siting wind outside of 12 nautical miles.

A commenter asked which action agencies respond to noncompliance with wildlife and environmental concerns if BSEE is mostly focused on safety? In response, DLCD offered a response in the table at the end of this summary\.

II. Section 2: Principles & Alternative Futures

One question that came up as Oregon Consensus and DLCD were reviewing comments was whether to keep the ordering and language the same as HB 4080? Or use the language and ordering from Draft 1 that better reflects the Roundtable discussions? DLCD:

- DLCD is still considering the ordering and language for objectives and would appreciate Roundtable feedback.

One commenter suggested integrating “cross-cutting themes” with “principles”. Others suggested adjustments to the principles. For example, one commenter suggested weaving a free, prior, and informed consent principle throughout the document (as stronger than just Tribal consultation). Another suggested framing the Roadmap as a “just transition” strategy and beyond permitting. In response, DLCD:

- Dropped the term “cross-cutting streams” and organized the current guiding principles and principles of meaningful engagement into four guiding principles: 1) meaningful engagement, 2) good information, 3) regional coordination, and a new 4) accountable checkpoints to meeting holistic objectives. The 4th principle encompasses the Roadmap's idea of “checkpoints” (formerly termed exit ramps) and elevates that concept to a guiding principle since many of the principles spoke to accountability.
- Language around Free, Prior, and Informed Consent is included in one of the Principles and has been discussed conceptually with LCIS and the Governor's Office. This language needs to be reviewed by DOJ and discussed with federally recognized Tribes through the Tribes-Only Table and Consultation with the state. Further revision may come in the next draft.

- Just Transition and Environmental Justice were added as principles.

One commenter noted that if meaningful engagement includes changing opinions on the South Coast, then that's not meaningful. DLCD is seeking Roundtable feedback on the this comment, especially surrounding the concept of "messaging" described in the engagement principles in Section 2. More has been added in the Enforceable Policy Assessment Appendix too, discussing the ballot measures in Coos and Curry Counties in 2024 and some policy options that may be open for local governments.

One commenter wanted to make sure the principles matched what the State of Oregon could realistically do or require. For example, they suggested making sure the language on community and Tribal engagement expectations match the reality of what can be delivered. Like, the State can't always "ensure" meaningful engagement in everything. In response, DLCD:

- Reviewed the document for instances of "ensure" and changed wording using best judgment.

Several commenters spoke to the concept of a "cap" on offshore wind generation capacity. Some appreciated it, but wondered what the correct carrying capacity might be? Others did not want a GW goal or cap. It could be through marine spatial planning, or some other thoughtful approach. Others did not want to include a cap on OSW generation. In response, DLCD:

- Included a callout box capturing the discussion around the question of whether a legislative cap on total capacity should exist, concluding with the statement that the Roadmap did not find a consensus position, and this question may warrant further exploration through more formal policymaking processes.

Several commenters spoke to the four alternative futures. Some suggested removing Path 4 (no wind, no supply chain) or moving it to an Appendix. Others suggested fleshing Path 4 out more with clearer pros and cons of pursuing Path 4. One commenter suggested removing Path 3 (pilot wind array) because California is essentially Oregon's pilot. In response, DLCD:

- Chose to keep the term "Alternative Future" with "Pathway" being the process steps and expectations on the road to those Alternative Futures;
- These recommendation have been considered, but in keeping with the discussions among the Roundtable and the concept of an "atlas of futures" where Oregon has multiple potential paths regarding offshore wind, this draft maintains all alternative futures in the main body;
- The numbering of the alternative futures have shifted to: Path 1 "no wind", Path 2 "supply chain only", Path 3 "pilot", Path 4a "turbines with port upgrades", and Path 4b "turbines without major port upgrades and more detail has been added for each future;
- Clarified that one Pathways could lead into another (e.g., a Path 3 pilot could lead to a Path 1 expansion or to a Path 4 exit from offshore wind);
- Questions for the Roundtable:
 - What recommended actions and processes would an Offshore Wind Roadmap present for a future aiming for no offshore wind?

- Should the pilot pathway remain? And/or should it include a variant where Oregon leans into California as the pilot?

Within the Markers of success, one commenter suggested that some of the bars might be set too high. For example, “Impacts to the ocean and shoreline environment are understood and fully mitigated.” And “Existing ocean users are not impacted or are fully mitigated for impacts.” This could be an aspiration, but fully mitigating impacts may be hard. In response, DLCD:

- Changed marker of success to read: “Impacts to the ocean and shoreline environment are understood, or impacts will be adaptively managed and are fully mitigated, with accountability measures for unexpected adverse effects that may emerge over time.”

A commenter asked to expand cumulative effects beyond project... “Considers all aspects of energy development as an interdependent system, including port infrastructure development, transmission needs, manufacturing, workforce development, transportation and shipping, and community support services. “. In response, DLCD:

- Added draft language to Section 5.3.3 further discussing the information needs at the permitting phase to include dependent or interrelated shoreside and estuary development, if it would not exist but for the proposed offshore wind project. This language needs to be reviewed by DOJ to better understand how it fits the state’s authority under the CZMA. Effects to communities and other uses are assumed to be part of the federal consistency review of an OSW project already.

National Wildlife Federation: Consider adding “monitor” to the mitigation hierarchy (p48, para 2). In response, DLCD:

- Added the following statement after referencing the mitigation hierarchy standards in Oregon policy: “Successful mitigation also involves sufficient monitoring to identify and understand the effects of human actions in the environment and respond to unexpected change.”

III. Section 3: Policy Assessment

One commenter asked how gaps will be prioritized, and if there could be some analysis of what it would take to fill gaps (cost, agency capacity, etc.). In response, DLCD:

- Did not change the document for this draft, but that is a good conversation to have with the Roundtable.

Commenters had some questions on specific effects or policies such as:

- Work with DOGAM on geologically unstable areas
- Explain what types of easements the state would issue (e.g., for beach or state park crossing)

- If siting requirements do not apply to transmission lines < 10 miles –does that represent a gap in requirements for the shorter line upgrades that would be needed along the coast?
- It appears that in your table of gaps, you are suggesting that DLCD would simply do a review and decide to lessen visual protections for some areas --I suspect that needs to be more of a public process/ decision.
- Table 3.3. Unclear which policies need to be modified, and which are references? Is DSL OK with TSP dictating procedures around JART?

In response, DLCD clarified language where appropriate. Some questions on the gap table will require further thought between Draft 2 and Draft 3. Regarding the DOGAMI comment, DOGAMI is an agency within the coastal management program and was consulted on the BOEM leasing decision. If geologic hazard policies are updated, DLCD would work with DOGAMI on reviews that touch on those policies. On the visual protection gaps comment, the gap is meant to convey that a review and update of the visual policies in the TSP should occur before future OSW permitting. This would be a public process through OPAC.

One commenter wondered if the Roadmap could include any lessons on what has happened in similar industries looking at what is promised vs. what is delivered in terms of infrastructure, housing, and other community investments. In response, DLCD:

- Added language to suggest that community socioeconomic studies consider lessons learned from other incoming industries. This is also a question we have been asking in our Community Based Organization focus group discussions outside the Roundtable, and any significant insights will be brought into the document. The EP Assessment appendix section on protecting coastal communities does contain a point about this in the current draft.

In Section 3.2.6., a commenter noted there needs to be more here to acknowledge the vote of south coast communities against FOSW –and there needs to be acknowledgement of the need for community benefit agreements with communities of place/ local governments. For the commenter, there needs to be something included that is similar to what DLCD has written for the fishing community. The only support for local communities seems to be DLCD assistance with zoning amendments –though even with that, communities expressed their lack of capacity to address concerns. Are there examples from elsewhere that could be helpful here? In response, DLCD:

- Added new language in the Enforceable Policy Assessment appendix section on protecting coastal communities does contain a point about this in the current draft. This section was relocated from the main body of the document, and Roundtable feedback is appreciated regarding where the section on effects should belong.

A commenter suggested citing and explaining that the BOEM public record exists with various comments on the BOEM leasing. In Section 3.2.1. Consider adding the Oregon Public Review Process reference (DSL), and clarify what the intent of JART process review would be. The

same commenter, in Section 3.2.4, suggested adding Goals 17 and 18 back in, which may be relevant for cable landings and shoreline infrastructure. In response, DLCD:

- Applied these suggested edits.

IV. Section 4: Pathways

OVERALL

Several commenters suggested adding similar detail for the Path 4 “no wind” and Path 2 “supply chain only” alternatives, and another suggested starting this section with those Pathways. And if the multiple pathways are included, summarize the pros and cons of each again from Section 2. Other commenters suggested removing the “no wind”, “supply chain”, or “pilot” pathways. In response, DLCD:

- Revised the alternative future descriptions to add as much detail as possible given current knowledge.
- Reordered the alternative futures
- Created an alternate Roadmap document that significantly reorganizes and reorders the alternatives and pathways in response to comments received.
- Comments about removing paths are further discussed in the response table at the end of this summary.

A commenter asked that the listing of objectives appear much sooner than Section 4, and noted Sections 3 and 4 aren’t usable by developers as a permitting pathway. In response, DLCD:

- Described the objectives in Section 2
- Recognized the need to develop a “guide for developers” as an Appendix or stand-alone document. A conceptual outline is included with this review draft.

One commenter asked that it would be helpful to try to identify who would do each of the tasks in each phase. For example from another commenter, if the science collaborative identifies research priorities, who “addresses” them? A different commenter noted that a developer’s survey and assessment between the leasing and permitting checkpoints could help fill a lot of the data gaps identified in a research agenda. Can the state ask developers to look at alternative sites for all the critical components of a project? In response, DLCD:

- This work is ongoing. Not all responsibilities may be able to be assigned within the Roadmap without direction from the legislature or Governor’s Office. This is also true for the Table in the Executive Summary and Section 5.

SITING, LEASING, AND PERMITTING

A commenter asked that in Section 4 and Section 5.3.2.1 be clear whether Marine Spatial Planning is to ID important areas for the state to protect/avoid vs. suitable areas for

development. DLCD would like to discuss this with the Roundtable further, but generally sees these as interrelated concepts.

In the transition from siting to leasing, would the State of Oregon ever request BOEM move to leasing? Another commenter asked to clarify, does this mean marine spatial planning has to be complete and have a full accounting of existing resources and space for development before we can pass the checkpoint from siting to leasing? Or are these the strategies and actions (Section 4.1.3) to be implemented during this planning phase, even if they are not complete before we move on to leasing? Note: we may need a separate bullet for species, the spatial element can be appropriate for things like designated critical habitat or migratory patterns or BIAs but there is also a larger need to update/assess best available information on where species are most vulnerable to effects of development. And should “increase state agency capacity” only be for environmental reviews? In response, DLCD:

- Good discussion for the Roundtable. Under the current pathways, the staff assumption has been that the Roundtable would expect spatial planning to be complete before leasing, but that it is more of an opportunity for the state than a requirement that would prevent leasing if not performed. Cumulative impact analysis, by contrast, is being discussed as a new requirement prior to leasing, as well as potentially other changes in TSP Part Two rulemaking related to avoidance of certain areas.

A commenter wanted more clarity during the Permitting Phase about the mechanism to enforce adaptive management? They felt there is a need to more seriously consider bonding amount requirements here (and possibility of bankruptcy or inflation). For them, the document needs to be clearer on what happens during leasing and permitting—the two phases are building greater clarity, consistency, and common purpose. In response, DLCD:

- This is further discussed in the comment table at the end of this summary. In short, the Roadmap proposes a concept for Adaptive Management enforceability, and this language has been further clarified based on this comment. California is also currently working on a legal analysis of adaptive management enforceability mechanisms, which is due out by spring 2026. California’s work may help inform additional options to include in the Roadmap.

CONSTRUCTION, OPERATION, DECOMMISSION/RENEWAL

Would the state have another consistency review opportunity at Lease renewal? Decommissioning plan? How would the State review a decommissioning plan?

In response, DLCD:

- Will confirm with BOEM/NOAA at the earliest opportunity, but there has been an expectation based on previous discussions that decommissioning will constitute a new federal authorization subject to federal consistency review.

A commenter requested that decommissioning be its own phase/separate from renewal, and include plans for blade failure and debris cleanup. They did not want to allow for “decommissioning in place”. Another wanted more detail on decommissioning plans and financial assurances for decommissioning. Discuss more about fisheries compensation. In response, DLCD:

- Modified the pathway diagrams to create a new Decommissioning phase. The Section 5 topics related to accountability and decommissioning have also been expanded.

V. Section 5: Objectives, Strategies, and Actions

Commenters requested inclusion of several new actions, such as:

- Requiring Missing and Murdered Indigenous Person projection plans (like CA).
- Provide \$ for community participation.
- Deal more with Joint Purchasing Agreements as ways to manage the electricity cost problem.
- Extend GLD to deeper than 500 fathoms.
- In Section 5.2.1.1. The cost benefit analysis needs to be realistic
- In Section 5.2.2.4 could ODOE count clean energy toward state goals if OSW energy lands in CA?
- In Section 5.3. Not sure enforceable policies can protect atmospheric cycles.
- Section 5.5.4. “Oregon Offshore Responsible Development Agreement” This is the first mention here.
- Clarify bid credit process in a call-out.
- Make sure research agenda is both A) pre-construction baseline, and B) post-construction information to get during operations
- In response, DLCD:
- Incorporated these comments and suggestions as best as possible, but if the second draft misses the meaning, please provide another comment.

A commenter wanted clearer articulation of how Tribal consultation and public engagement will intersect somewhere in the document? In response, DLCD:

- Is seeking additional clarification what this comment is asking.

A commenter noted that power demand from AI and data centers is a big deal and needs consideration (Section 5.2.2.2.). In response, DLCD:

- No changes to this draft. Are there specific recommendations on what the Roadmap should say about new sources of demand?

Two commenters (Section 5.1.1.1.) talked about the process Figure as not helpful (one person noted that the BOEM graphic was better. A commenter asked if the state is taking on too much

responsibility to convey information that should be coming from the developer? In response, DLCD:

- Modified the figure to attempt to make it more readable and added context in the text describing the purpose of the figure. The language about conveying information was adjusted slightly to say “participate or convene” rather than just “convene”.

Appendix

Detailed responses to selected significant comments:

The following are some of the more specific comments received on the September draft, and DLCD’s response. Some of these repeat some of the themes from above. DLCD wanted to retain this table so you could see it.

	Specific Comment	Response
1	Executive Summary table of recommended actions Provide greater clarity around who is responsible for each action.	This work is ongoing and will be refined in the next draft due to available time. Not all responsibilities may be able to be assigned within the Roadmap without direction from the legislature or Governor's Office.
2	Section 1.2 BG: It would be interesting to learn the results of community engagement conversations described in 1.2	The results of the community engagement conversations will be included in an appendix to the Roadmap for the Public Review Draft.
4	BGA: Add the climate urgency as context for the potential need and exploration of offshore wind.	Suggested language was added to the background in Section 1.4
5	Section 1.4: HE: Is the offshore wind inquiry in state waters referenced in Section 1.4 still happening?	There has been no further contact since the initial inquiry in August 2024. Additional language has been added to clarify.
6	Section 1.4 (Regulatory Process) AV: Since the current administration just removed the cumulative impacts analysis --made it into a reasonably foreseen effects analysis - -I think there will need to be a state level review that serves that purpose (if we want to have the values associated with the California Current ecosystem persist into the future.	Noted. The draft has been updated to reflect this change.
7	Section 1.4 - Include key challenges identified in the 2022 ODOE FOSW study in addition to benefits.	Draft revised to include key challenges from the report.
8	Section 1.4 There is the possibility that online NOAA reports related to clean energy and the biological values of the ocean may disappear off the internet (as has happened with other federal agency websites at this time). I would recommend that you download pdf copies of them all -- in case there will be a need to have a separate portal to host them.	Added to the to-do list to obtain local copies of relevant NOAA reports or locate alternative online sources (e.g., https://web.archive.org/web/20250000000000*/NOAA). There is not an action recommendation in the Roadmap for this presently, as it seems untimely given the planned publication date.

9	Section 1.4 MG: The LCOE cited in previous paragraphs was based on very specific siting and spacing considerations. It is unlikely that those scenarios considered the cost of developing a wind turbine cabling array that distributed power to each of the 5 existing substations along the length of the Oregon Coast. A statement should be added to point out that the cost of developing a subsea or shore based transmission system designed to connect to all 5 coastal substations is likely to be prohibitively expensive.	The 2019 study did assume five separate development sites spread north to south along the coast to coincide with existing substations, and the cost estimate included offshore and onshore cable routes. Offshore routes ranged from 32 to 48 km in length. While the estimates used in the study may not reflect actual cable routes informed by a siting process, the cost estimates appear to be based on reasonable assumptions and in consideration of the cost factors mentioned in the comment. The report does not include port upgrade costs or bulk grid system upgrade costs (upland).
10	Section 1.4 MG: on Page ES-24 another study found that “significant transmission upgrades would be required to support a 3 GW build-out of offshore wind generation, if development focused only on the south coast BOEM call areas, and could require costly and long lead time efforts, potentially costing up to 1.2 billion dollars and taking 10-15 years before construction could begin.” Considering the purpose of this document is to advise policymakers responsible for allocation of public funds, it would be appropriate to point out that the 2016 study of jobs and economic impacts was based on theoretical scenarios that are highly unlikely to ever be developed based on other limitations. If an investment of 1.2 billion dollars is needed to add \$1.6 billion to the GDP, the margin of benefit is far less than suggested by the 2016 study.	. A sentence was added to the section on job benefits to GDP stating: “It should be noted that these hypothetical scenarios should be refined and balanced against other factors in an offshore wind system, such as siting limitations for offshore arrays and port upgrades, transmission upgrade costs, and local supply chain capabilities.” While transmission and port upgrades represent significant costs, it is unlikely that coastal communities exclusively would bear those costs. It is not clear that these costs would cancel out the job benefits and economic growth benefits that would come from investment and employment. I don’t think we know enough to say whether the transmission upgrades, port upgrades, and most notably supply chain development are highly unlikely to occur.

11	Section 1.4 MG: Again, this document should present job estimates with a keen awareness that policy makers are quick to grasp at jobs numbers! As such, it is advisable that whenever job estimates are cited in this document, care should be given to differentiate the jobs likely to be filled by Oregonians and those filled by itinerant workers or workers employed in other regions. Based on the experience gained by land-based wind energy development in Oregon, it is reasonable to say that it is unlikely that major components such as nacelles or subsea cables or heavy duty transformers will ever be manufactured in Oregon. Therefore, Oregon is unlikely to benefit from the employment associated with these aspects of manufacturing supply chain, Based on the statement in the final paragraph on ES-26, "Component supply chain activities accounted for approximately 60 percent of the jobs, and 76 percent of those were associated with producing the materials for fabrication and manufacturing" Oregon will only benefit from a small fraction of the employment linked to OSW because the vast majority of the employment benefits will accrue outside of Oregon.	Sentence added to note that the extent to which fabrication and manufacturing opportunities accrue to Oregon as opposed to other places would depend on the level of corresponding manufacturing supply chain development in Oregon.
11-2	(General Comment – applies to Section 2 Principles) BGA/MC: Strengthen the human rights approach: move beyond consultation to include Free, Prior and Informed Consent and acknowledge the UN Declaration on the Rights of Indigenous Peoples.	Recognizing the importance of the concept of Free, Prior, and Informed Consent is included as one of the principles guiding offshore wind decisions. No specific actions have been included in this draft, but this comment has led to initial discussions with the Legislative Commission on Indian Affairs and the Governor's Office regarding state policies. The principle language has been modified slightly from the first review draft and still needs to be reviewed by DOJ. Additional amendment may appear in future drafts, following additional discussion with Tribes via the Tribes-Only Table, formal Consultation on the Roadmap, and ongoing state-level working group discussions within the Tribal Consultation Taskforce.

12	Section 2.5 (Alternative Futures): Consider changing the order in which the Pathways are presented in this section. It would be easier for a reader to follow a format where individual paths are presented in ascending or descending order of complexity/intensity. For example, Path 3 (pilot project) might be more logically presented following Paths 1a and 1b as it is one step lower in scale/intensity than the previous. In my opinion, I'd prefer to begin with the status quo scenario (no OSW development) and present paths that represent departures from the status quo in ascending order of intensity and complexity. The current draft presents information on various pathways before the context setting section on policies. This order makes it difficult for a reader to judge if or how individual pathways might fit into Oregon's current policy framework when first confronted with a pathway. It would provide more clarity to readers if they were familiarized with the current policy context before being presented with the array of pathways. I suggest you consider presenting the information labeled Section 3 (Policy assessment) in the Draft before the information presented in Section 2 (Alternative futures/pathways) of the Draft.	Alternative Futures reordered consistent with the comment and the discussion at the September 2025 Roundtable meeting.
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13	Section 2.5 BG: The page discusses four paths 1-4. The first bullet presents Path 1A including port development and Path 1B not including port development. These two sub-paths are shown in Figure ES-1. However, these two paths are not really discussed further in the SPM and don't really figure into the roadmap. See below for more on this discussion on Sections 2.5.1 & 2.5.2 of Paths 1A & 1B. If, based on revisions to Sections 2.5.1 and 2.5.2, Paths 1A and 1B are consolidated, Figure ES-1 would need to be revised to align it with Figure 2.2. Bullet "Path 3" I don't believe this is a realistic alternative and advocate it should not be included. Rather, text to explain that while OR planning supports a pilot project before committing to a full project, there are many reasons given why a pilot will not be developed, including: • Not needed given the lessons learned from the adjacent wind farms in CA. • Not economically viable so no developer will buy a lease to do one and even if they did, the cost of the electricity would be prohibitively expensive. • The lessons learned from a few turbines may not scale to dozens of turbines – also see 1st bullet	Roundtable discussion. The main difference between Path 1a and 1b (now 4a and 4b) concerns the potential tradeoffs of developing ports in Oregon vs. elsewhere. This seems to be an important distinction that could affect uses/resources, job totals, and economic viability of projects. It seemed important to distinguish between these paths in the Alt futures, but the point is taken that there are not different pathway diagrams for each future. What does the Roundtable suggest to address this? For example, there would likely still be a need for port and supply chain plans due to activities besides a Staging & Integration facility, so that aspect of the pathway would remain the same either way. Regarding Path 3, It has been retained in the draft if for no other reason than to document the train of thought surrounding it. Even if the likelihood is low now, it does remain a potential path if the state or a federal agency chose to pursue and fund it (similar to Maine's Research Lease. If California proceeds with leasing, the barriers to placing an array off Oregon might be lower than the 1 GW lower capacity amount that industry representatives relayed to me in our focus group conversation. It is open for further discussion if others on the Roundtable similarly feel that this alternative should not be retained in the main body and should instead be put into an appendix.
14	Section 2.5 - Paths 2 through 4 shouldn't be described or considered equally with Path 1a and b, since these do not ultimately lead to "offshore wind development [or] approval [in Oregon]". I recommend Paths 2-4 be described and analyzed as alternatives or "alternative futures" or "other paths considered" or "other potential paths" at a lower level of detail and in an appendix, which would limit the length of the main document.	This recommendation has been considered, but in keeping with the discussions among the Roundtable and the concept of an "atlas of futures" where Oregon has multiple potential paths regarding offshore wind, this draft maintains all alternative futures in the main body.

15	Should there be a pathway diagram for a “no offshore wind participation” future?	Question for the Roundtable. What recommended actions and processes would a pathway diagram show for a future aiming for no offshore wind?
16	The introductory paragraph under 2.5.5 Path 4 should be expanded to include a similar level of detail/discussion to the other sections that involve OSW development. This could include a discussion of implementation strategies identified in the ODOE energy planning strategy, discussion of pathways that would enable Oregon to meet its climate goals in the absence of OSW development. This could include discussion of Oregon’s participation in regional transmission networks or examples of how states without coastlines are working to attain GHG reduction targets.	This section has been expanded to further describe the “no offshore wind participation” future. Future revisions may contain additional information to better quantify the coastal grid resiliency and reliability tradeoffs if it becomes available (e.g., work by PNNL that was mentioned in one of the Roadmap Lunch & Learns). I have reached out to the PNNL researcher and await a response.
17	No OSW alternative future: Should this mention that under normal circumstances an OSW developer can still propose a project at any time, even if the state decides not to attract OSW? under normal BOEM procedures, BOEM must consider it and so must we all. This is not currently the case while the Presidential Memorandum is in place (no new leases) but that may not always be the case. The ultimate trade off of this pathway is that the state does not plan for OSW and then it comes to the state anyway.	Language added to the description of this scenario and in the list of considerations/tradeoffs.
18	The Pilot Project alternative future seems to be a false option based on the factors described and should be removed.	Question for the Roundtable. Should the pilot project alternative stay, if only to show that it was considered? Alternatively, is there a variant where Oregon leans into the idea of California being the pilot and as a result invests in answering its research questions through greater financial participation in a West Coast Science Collaborative?

19	Section 2.5 - Supply Chain alternative future: BG: Similar to the above section, I don't see the connection to this scenario and any changes to the roadmap. I may have missed something very important, so, if so, my apologies.	Under this scenario, the state would not proactively invest in offshore wind siting, policy amendment, or research to prepare for offshore wind, whereas under the paths with offshore wind development these actions would happen concurrently with supply chain development. The point is taken that the supply chain alternative is a subset of the actions for full development, but if this path is selected, it may inform what the state does NOT pursue in the near-term.
20	Section 2.5 Pilot Project alternative future (specifically the point that California's development may serve a similar purpose): Perhaps, but this would require regional coordination/collaboration. Also, is CA ahead of us in terms of floating offshore wind to an extent where we can use their outcomes to inform on ours?	Language added regarding timing considerations.

21	Section 2.5 (Path 1a/4a) These studies indicate that extensive modifications to the federal navigation channel would be needed to accommodate the stated OSW staging and integration facilities. A current proposal under review to deepen and widen the Port of Coos Bay navigation channel to accommodate container vessels proposes dredging of over 30 million cubic yards of sand and bedrock from the bay bottom. Projected costs exceed \$550,000,000. The extraordinary cost of the proposed 45' deep navigation channel expansion stems from the fact that extensive bedrock dredging will be required to achieve this depth. One third of the material to be removed from the estuary bottom to accommodate expansion of the navigation channel to accommodate larger deeper draft vessels is bedrock which is significantly more challenging and costly to remove. To some, the scale of cost and degree of modification to the estuary necessary to accommodate staging and integration facilities could reasonably be considered excessive. In contrast, Figure 7 rules out the Umpqua river as a potential location for a staging and integration port because of the "shallow water depth in the channel". The Umpqua river hosts a large vacant industrial site at Gardner, the former site of the International Paper mill. This site has a generous "footprint" sufficiently large to support a staging and integration facility. The site is located a similar distance to the ocean entrance to when similar potential sites on the Coos Estuary. Should the bedrock surface underlying the Umpqua estuary, be sufficiently deep to allow dredging without necessitating bedrock dredging, this harbor may be more be a more suitable and cost-effective location for OSW integration and staging operations than the Coos Estuary. An OSW facility on the Umpqua river will avoid potential aviation conflicts that are likely to limit development and siting decisions for a similar facility on Coos estuary.	Costs and volumes related to the proposed navigation channel modification have been included in the description of the alternative. A footnote was added to include this concept of using the Umpqua River as an alternative. However, there would be policy challenges because the Umpqua River is designated in administrative rules as a shallow draft development estuary with a maximum channel depth of 22 ft. This is not insurmountable, but further investment in data and studies would be required. The idea at least has been retained in the Roadmap.
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22	Section 2.5 Alternative Futures (Re: loss of federal funding for the Humboldt Bay Port Project): Rephrase to say port development requires significant financial investment and the feasibility of development is dependent on reliable availability of funding which may be subject to political decision-making...cite the recent action but don't be explicit, this can always happen, make that point instead.	Language was revised to make the general point while still retaining the specific example of Humboldt because it has a direct effect on the scenario with no major port development in Coos Bay.
23	Question of interest here - does on-shore or in-port maintenance have different or the same requirements as staging and integration? Could there be a scenario where Coos Bay Port is currently big enough to handle a single turbine for maintenance purposes, but not a fully operational staging or integration area?	By my understanding, maintenance requires the same navigation channel access to tow an assembled turbine to the O&M facility, so the limitation would be the foundation needing to be towed to shore for servicing the turbine. Technology continues to evolve, however, so it is possible that future foundation designs may require narrower or shallower channels, or offshore floating wharves may be able to be installed where ocean conditions permit.
24	Rename Section 3. When paired with "opportunities," "effects" seems like a negative while opportunities seems like a positive. If effects is intended to be a neutral term, omit opportunities or swap "effects" with a different neutral term.	Section 3 renamed to "Policy Assessment, Addressing Objectives and Seizing Opportunities.
25	(Applicable to multiple Sections) Should the order of the subsections be organized in the same order as the HB4080 standards? For ease of the reader tracking things, there may be value in placing the Objectives' icons and text in the same order as HB4080. Currently they are #7, #6, #5, #4, #1, #2, #3. This general comment is applicable in text where the objectives are presented out of order of HB4080's list.	Question for the Roundtable: preferred order of objectives in the document?

26	Section 4 description of Permitting and a state decision to issue easements and permits for portions of a project on state-owned land: “this is the first time I am ever hearing about this step of Oregon issuing easements --are you talking about through state parks or ODOT land, beaches? This should be better explained somewhere”	These state and local easements, permits, and other authorizations are described in Section 1.4. Easements for use of submerged lands within the Territorial Sea are under jurisdiction of DSL. Ocean Shore Alteration Permits from OPRD address cables on or under the ocean shore. Local governments have jurisdiction within their jurisdictions for permits or land use decisions.
27	Section 4 BG: Does lease end and decommissioning trigger another consistency review? I can see for a lease renewal, but not for decommissioning.	It is expected but not formally confirmed that decommissioning would require a federal authorization that triggers federal consistency review. This will be clarified with NOAA OCM and/or BOEM at the earliest possible opportunity. The Roadmap currently assumes that the state will have the opportunity to formally review decommissioning action after lease ends.
28	4.1.2: Build community engagement partnerships with other agencies, local government staff, and non-governmental organizations to combine resources and facilitate consistency in messages to communities. Comment: I still don't understand how you are going to do this. Will DLCD work with outside groups to "convert" local people's opinions to a pro-offshore wind energy views? I have concerns about how this is going to be received. Is that truly meaningful engagement? I remember sitting in the room with local gov't in Brookings where the gentleman representing that city said it feels like the state is not listening.	To discuss with Roundtable.

29	Section 4 (Lease Phase Pathway Diagram): “Consider a pilot or state/community-owned lease JB1”. JB1BG: For myriad reasons, I believe this is an implausible option.	To discuss with Roundtable. Relates to previous comments about the pilot project alternative
30	Section 4 Referring to studies post-leasing to support COP development: This is the site characterization phase, should it be called that instead of permitting? Suggest you add a phase so it goes phase 2-leasing 3-site characterization 4-permitting	To discuss with Roundtable. Should a new lifecycle phase be added between leasing and permitting to span the characterization and permit review stage? For this draft, language was added to explain that the Permit phase spans from issuance of a lease to issuance of a permit.
31	Section 4.1 Permitting Phase Pathway: I am wondering again about communities of place and local governments role in some of these phases. There seems to be no role identified --except for the phrase "meaningful engagement"	Local communities and government would have primary roles in local permitting decisions for portions of the project within their jurisdiction, and if there are effects from the project on a community, they would have a role in negotiating community agreements with developers (with support from state enforceable policies if attempts to establish them succeed).
32	4.2.1 (Leasing) Clarify, do you envision the science collaborative having the responsibility to address all the research priorities? I envision them identifying priorities to be resolved by BOEM or future lessees.	To discuss with Roundtable. The vision for the science collaborative is to be a forum for building consensus on state of the science and information needs that can advise the state when making leasing and permitting decisions.

33	Include more information about the decommissioning phase of a project lifecycle and consider creating a separate phase focused on decommissioning.	The Lease End/Decommissioning section in Section 4 has been rewritten and significantly expanded to better describe key aspects of this phase and the steps required to meet Roadmap objectives. A new lifecycle phase was added to focus exclusively on Decommissioning.
34	Section 5.1.1 AV: Can you better explain how the Tribal consultation and public engagement are likely to intersect?	Need more information on this question and what kind of information is being sought.
35	5.2.1.1 AV: Can you explain here more about the least cost/ least risk approach and why this report seems to suggest we should not be following it?	The recommendation here is to evaluate the potential economic benefits of developing an offshore wind industry in Oregon as a factor that may make it more worth the cost of investment in an energy source that is more expensive than other options that would not bring the same economic and job benefits. The main idea is that least cost/least risk as a central criterion may lead to the state missing out on opportunities that could result in net benefit, but the concept needs further study, which is why it is connected to the research report described in the Oregon Energy Strategy.

36	Section 5.2.1.2 “These included an assumption that California fully realizes its goal to develop 25 GW of offshore wind by 2045, cost models that showed alternative emerging technologies (e.g., enhanced geothermal) outperforming offshore wind on cost by small projected margins^[JB1] (thus leading to offshore wind to not appear in the current strategy to fulfill the portion of future energy demand that could be served by emerging technologies), and a coarse “pipeline model” representation of the actual state grid infrastructure that does not account for real transmission and market costs and access.” AV: I thought it was by large margins based on listening into meetings --that the costs of other forms of renewable energy were much lower. You should include more of a citation here.	To discuss with the Roundtable. Additional research into the Energy Strategy model was conducted, and language was added to try to better explain this concept. In simple terms, a portion of the projected energy mix from now to 2050, presented in the Energy Strategy, is dedicated to enhanced geothermal as an emerging technology (1.6 GW by 2050). This amount could be filled by any emerging technology, but according to discussions with ODOE, geothermal was the least cost option and consequently was apportioned the entire amount. The cost difference by 2050 is estimated to be \$58 for enhanced geothermal compared to \$61 for offshore wind according to NREL (Index Electricity 2024 ATB NREL), but on a purely least-cost basis, enhanced geothermal outcompetes offshore wind. However, a more holistic analysis that includes economic and job opportunities from building out the supply chain (and considering other costs such as transmission needs for each option) might affect the relative competitiveness.
37	Can ODOE address whether or not the state can use OSW development to count toward OR clean energy goals if the transmission is landed outside the state? Would OR still have to compromise habitat and existing uses elsewhere to build more renewables elsewhere?	Inquiry sent to ODOE.
38	5.2.3.3 Action: Study the opportunities and challenges associated with different models of offshore wind ownership (investor-owned vs. public-owned vs. community-owned vs. other)	Question for Roundtable: should this action remain in the Roadmap? What actions could the state practically take here? Wouldn't it be an open option for a community to propose this if they determined it fit their interests? Is any state action needed on a policy level?

39	CTCLUSI comment on Section 5.3 (Protect the Environment): This section should identify a goal of identifying impacts prior to lease sales — not deferring the assessment of later NEPA processes.	To be discussed at Roundtable. The Roadmap current draft differentiates between the level of information required at leasing vs. at the project stage, requiring project specific impacts at the permit decision. Is the comment suggesting that project impacts should be part of the leasing evaluation? What level of certainty is being sought here given that a technology has not been chosen and there may be site-specific effects that can't be known until the site is characterized? Would a conceptual level impact analysis be acceptable, using a standard project design and the information that is known about the lease area from the siting process? The practicability of forcing BOEM to produce a conceptual NEPA analysis at the leasing stage is unknown from a legal standpoint, given that the federal action at the leasing stage does not include approval of a project. There are also practical limitations to requiring BOEM to develop the analysis, since it is not their practice currently.
40	Section 5.3 BG: As discussed in the meeting, OR has limited leverage to demand a cumulative effects assessment by the time of leasing, even one that is conceptual with assumptions and sensitivity analyses. A cumulative effects assessment will be required by the permitting as part of an Environmental Impact Statement, but that's too late in the process to really affect things. As we discussed, maybe this is a policy gap that needs to be fixed because a conceptual cumulative effects assessment is a valuable tool for many decisions early in the process prior to leasing	This has been added to the policy gaps table to be considered during a Territorial Sea Plan Part Two update.
41	Section 5.3 BG: How does this discussion incorporate changing ocean and terrestrial conditions due to global warming and climate change?	Existing policies already require a cumulative assessment at the permitting stage that is inclusive of changing ocean conditions.

42	Section 5.3: BGA Climate and coastal resilience: Require developer co-investment in shoreline protection, sea-level rise adaptation, and emergency preparedness.	This comment appears to be asking energy developers to invest in state hazard mitigation actions unrelated to a proposed OSW project. The comment has not been incorporated but may be discussed further at the Roundtable.
43	Section 5.3 MC: Strengthen environmental protections by adding fisheries compensation and transition funding, cumulative impact and health equity screening, developer co-investment in shoreline resilience and sea level rise adaptation, stronger biodiversity monitoring, and protections for Tribal data sovereignty.	All of these concepts (with the exception of health equity screening, shoreline resilience, and sea level rise) seem to already be included in the Roadmap, either in existing policies or new proposed actions (community agreements inclusive of compensation structures, data sovereignty for Tribes). See the comment above regarding shoreline/sea-level rise being out of the scope of OSW effects subject to review and mitigation. Additional information about what equity health screening means and its imagined role in the Roadmap is needed.
44	How is climate change incorporated into Goal 19 and the Territorial Sea Plan?	Territorial Sea Plan Part Five requires a cumulative impacts evaluation inclusive of climate change. Goal 19 describes a precautionary approach to ocean management when information is limited, which may be interpreted to apply to the compound effects of climate change and proposed ocean energy development.

45	Section 5.3 Later you mention bonding. I am thinking THIS is the phase where there needs to be greater clarity on that --can the state, as part of its consistency review --VET the plan for bonding to ensure it is sufficient? I am thinking about foreign mining companies that abandon assets that continue to produce pollution with no accountability. I am thinking of runaway inflation --whereby costs of remediation or decommissioning in the future may far exceed what BOEM is going to require. Seems like an important thing to consider more seriously at this phase.	An action was added to this section to specifically discuss decommissioning standards and review of decommissioning plans financial assurance required by BOEM during COP review and at the end of the project lifecycle. Language was also added to the existing action around accountability, focused on financial assurance expectations to address unforeseen incidents during project operation.
46	Section 5.3 (Responsibly Managing Uncertainty and Risk): Shift language from “uncertainty” → “knowledge gaps.” Not all uncertainty can be removed, but gaps must be managed.	This comment has not been applied but is open for discussion among the Roundtable. The term “knowledge gaps” implies that unknowns may be fully resolved prior to a permit decision, but some irreducible uncertainty is likely to remain because perfect knowledge of the future is not possible. The concept of uncertainty and risk management is meant to address remaining uncertainty through forward-looking planning and ongoing adaptive management frameworks, which are the focus of the action that originated this comment.
47	Section 5.3 (Responsibly Manage Uncertainty and Risk) (discussion of prescribed responses and frameworks for Adaptive Management) I am still not clear on the enforcement mechanism here.	To discuss at the Roundtable. The Roadmap proposes to integrate the adaptive management framework into the COP approval to provide reasonable assurance that state policies will be upheld in the face of uncertainty.

48	Section 5.3.2.1 (Sea Space Suitability Identification) Clarify, is the goal of marine spatial planning to inventory areas and resources important to the state OR to perform a suitability analysis for the sake of finding areas more or less suitable for development? This says it's the latter but we have been talking about it as the former. These are two VERY DIFFERENT spatial analyses.	To discuss with the Roundtable. My assumption is that the suitability identification process has the latter purpose, with the clarification that an analysis of suitability would be based on the identification of resources on the Outer Continental Shelf for which the state has an enforceable policy that may make an OSW proposal at that location more or less challenging to demonstrate consistency. In this way, the two concepts are linked in my view.
49	Section 5.3.2.1 (Sea Space Suitability Identification) A desired outcome of the effort would be to reveal areas that are viable for development, areas where the state would require additional information, and areas where development may be more challenging when accounting for applicable state standards JB2 . JB2BG Would these standards include economic considerations?	To be discussed at Roundtable or MSP working group. What economic standards are envisioned here to be used during sea space suitability? Economics of OSW viability? If offshore wind developers participate, the hope would be that they can bring economic feasibility information into the process. There are also existing PNNL reports that estimate the difference in levelized cost of energy off the north vs. south coast that could be used as data layers.

50	Section 5.3.2.1 (Sea Space Suitability Process)“In order to successfully identify suitable sea space, the spatial planning process should explicitly define a goal of finding an amount of space suitable for a specified amount of energy production capacity. The process should be limited to a duration of 18 months.” This explicit GW goal and prescribed timeframe are beyond the scope of the Roadmap and not consistent with what we heard at the Roundtable. There are some advocates that want this but just as many or more that don’t want a future planning process to be this limited. See suggested edits	To discuss at the Roundtable. Should sea space suitability process have a set OSW capacity goal and a deadline? Note: The new callout box describing the concept of a legislatively prescribed cap on development concludes with a statement that there is not consensus in the Roundtable regarding whether there should be a cap.
51	Section 5.3.2.2 (Research Agenda) Clarify, is the research agenda entirely aimed at pre-construction baseline information? I was assuming that many elements of the research agenda would be aimed at post construction - things we want to learn about during operations.	To be discussed at the Roundtable in conjunction with the Research Agenda meeting topic.

52	Oregon supports the early collection of baseline information [DK1] at a level of resolution to be useful in future development. However, absent Wind Energy Areas to focus a baseline information need, it is likely not efficient to collect fine-scale information about seafloor habitats. Through the course of state-led sea space suitability planning (Section 5.3.2), broad priority areas may be defined (e.g., high wind potential, low conflict zones, examples are the prior WEAs) where it may be appropriate to initiate scalable, habitat-focused baseline data collection that can be refined later if WEAs are designated[DK2] . [DK1] This point is made and contradicted in the same paragraph. See suggested edits. [DK2] This goes back to suitability approach to MSP. statement about seafloor data is debatable, we do need data at some resolution for the entire ocean to do MSP from an inventory approach. Please remove this statement, it doesn't add value and needs more explanation to be accurate.	To discuss at Roundtable. This contradiction is an important tension to recognize, that while we want baseline data, it is challenging or infeasible to know *where* to collect that data absent a smaller area of focus represented by a WEA.
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53	OPAC and the Oregon Department of Energy [DK1] should remain engaged in offshore wind research in future years and update the Research Agenda as the state of the science evolves [DK2] . . [DK1]Why ODOE specifically? [DK2]Why status? Is this what you mean?	This recommendation relates to the Oregon Energy Strategy recommendation for ODOE to report on the status of emerging technology like OSW. Also makes use of ODOE’s role to provide expertise on the status, opportunities, and challenges associated with different energy options.
54	AV: It seems from this that BSEE's purview is primarily safety rather than any problems related to degradation of the ecosystem. Is that true? If so, what agency would need to respond if there were noncompliance issues related to wildlife? would that be NOAA or USFWS?	This will be researched further and expanded upon in a future draft as appropriate. NOAA and USFWS do have authority to require and enforce measures to protect species under the ESA and MMPA, but the experience of the Nantucket blade failure also suggests that BSEE required an environmental effects evaluation after the incident. “Environmental Enforcement” is part of the agency name, so presumably they have jurisdiction over the environmental effects of offshore energy facility incidents. See the BSEE regulations for more information: eCFR :: 30 CFR Part 285 -- Renewable Energy and Alternate Uses of Existing Facilities on the Outer Continental Shelf 30 CFR Section 285.105 states: “As a lessee, applicant, operator, or holder of a ROW grant, RUE grant, or Alternate Use RUE grant, you must: (a) Design your projects and conduct all activities in a manner that ensures safety and will not cause undue harm or damage to natural resources, including their physical, atmospheric, and biological components to the extent practicable; and take measures to prevent unauthorized discharge of pollutants including marine trash and debris into the offshore environment.”

55	Section 5.3.3 (page 134): The Tribe strongly supports including shoreline and near shore development i	A new action has been drafted in Section 5.3.3.1 related to the coordination of OSW permits and dependent or interrelated shoreside and estuary infrastructure.
56	Section 5.4: Add Tribal-led safety and Missing and Murdered Indigenous People (MMIP) protection plans as part of state checkpoints to address risks from transient construction workforces.	DLCD is coordinating with California for guidance on state actions the Roadmap can recommend and will consult with DOJ regarding the legal basis of potential enforceable policy approaches around this recommendation. This topic will also be raised at the next Tribes-Only Table and in Consultation discussions with Federally Recognized Tribes of Oregon.
57	Section 5.4.2.1 (Protection of Natural Resources as Cultural Resources) This section should include exclusion of development in important habitat/fishing areas as a potential option.	Reference to the avoidance of fishing areas and habitats important to Tribes during a sea space suitability process was added in this section. If the state includes Tribal fishing explicitly in TSP Part Five, this policy may provide further support for avoiding significant adverse impact to Tribal fishing uses and resources, which could be used during Federal Consistency reviews.
58	Sections 5.4.3 and 5.4.4 (protection of archaeological resources and protection of areas used for cultural practices) CTCLUSI These two sections should identify a requirement for assessing and mitigating impacts to resources associated with shoreline and onshore project development.	Further clarification and discussion requested regarding where the gap is and what is needed.

59	Section 5.4.9.1 Why can't DLCD request to see ALL information from site characterization activities? I suggest striking down "unless information therein is exempt from disclosure under FOIA..."	These bullets reflect the conditions that Oregon was able to secure with BOEM during the 2024 leasing decision. It is worth noting that in the following sentence, it was specified that in the event information is protected under FOIA, the state would receive a copy of legally permissible data with the FOIA-exempt information redacted. Language will be added to state that in all future reviews, the state should seek the maximum amount of site characterization information permissible by law.
60	Section 5.5.1.3 The state should support adequate funding for local jurisdictions to address the gaps identified in the Enforceable Policy Assessment of this Roadmap prior to the permitting phase of a potential future offshore wind energy project or onshore/port developments that would support future offshore wind activities[DK1] . [DK1] Does this have precedence in Oregon or is this new?	DLCD offers technical assistance grants to local jurisdictions for purposes of plan amendment. A similar mechanism is envisioned to support any needed enforceable policy amendment at the local level to address gaps related to offshore wind.
61	Section 5.5.4 CTCLUSI Discussion of Tribal Agreements should be pulled from this section and included in the Tribal Section above.	Separate section created in the Tribal Interests portion of the document. Based on early Consultation feedback, the term "Tribal Benefit Agreement" has been renamed to "Tribal Mitigation Agreement".

62	Definition of “Community Agreement”: This Roadmap uses the broad term “Community Agreement” to mean a legally binding, negotiated agreement between a project proponent/developer and a community, often represented by a coalition of community group(s), outlining benefits they will receive in return for their support or non-opposition of a project.	To discuss with Roundtable (or CBA WG). Is this the appropriate definition to use for the broad term Community Agreement? Is “non-opposition to a project” a necessary component of this definition, and does it imply that signatories to an agreement would not be able to oppose the project if, upon review of project details and impact analyses, they conclude that the project is not compatible with their interests? Note: Could a CA include a non-opposition agreement, contingent on the results of project evaluations being consistent with policies and interests of the signatories and the project obtaining all necessary authorizations? If the project is found inconsistent and does not move forward, the CA would be dissolved anyway.
63	Section 5.5.4 MC: Provide resources for community participation — such as local liaisons or navigators, small grants for facilitation, and clear reporting on how public input shapes decisions.	These concepts have been included in the “resource needs” portion of Section 5.5.4. The “clear reporting of how public input shapes decisions” is part of the meaningful engagement principle in Section 2.

64	There are also potential state resource needs related to providing technical resources, relevant information to community needs, ongoing monitoring and enforcement of community agreements, if the state is a party to those agreements. [DK1] [DK1] Assumption is that the state would not be a party to these CBAs because their purpose is to memorialize agreements between developers and communities.	To discuss with Roundtable (or CBA WG). Discussion in the Community Agreements working group introduced the idea that the state could be a third party to CAs to facilitate enforcement. It is unclear whether the state would be able to enforce a CA to which it was not a party if that CA was used as evidence of consistency with a community net benefit policy during Federal Consistency review. Further discussion is warranted, including review by DOJ. Does the definition need to change to be consistent with this tenet? Community Agreements should not strictly bind communities from withdrawing support if warranted. Examples of conditions that may trigger the “fair” withdrawal of support from a project include: a) Conditions change and agreements don’t change to match; or b) Terms of agreements are not honored.
65	Section 5.5.4.1 (creation of new enforceable policies to require net-benefit to coastal communities) OTC what if it is unclear what level of contributions would be required from a developer until the effects are known and well understood?	One of the tenets in this section is: “Community agreements should be adaptive and open to revision and review over time as <u>conditions</u> change or <u>community needs</u> change. Some community needs may not present themselves for years after the permitting process. An agreement may include parameters on how to renegotiate/revise the agreement, exits clauses, community endowments overseen by the community, mediation support agreements, or other elements to govern the ongoing maintenance of the agreement over time.” If community agreements can be brought into Federal Consistency reviews, part of the review standard could be whether the agreement has an adaptive component.

66	Section 5.5.4.3, (discussing the need for state neutrality in Community Agreement negotiations) AV: This is an interesting and important point relative to an earlier comment I made about identifying who will do what in the action part of things. It could be useful to have a diagram of possible state roles (with sub agencies having, perhaps, more specific roles). If this is a concern, be aware that certain parts of this document that seem to promote OSW energy development irrespective of costs and benefits - -already come across as not neutral--which I realize is a tension within the legislative directive you are following	There was not adequate time to fully address this comment for this draft. For the public review draft, DLCD will attempt to clarify the state roles relative to recommended actions in the Roadmap.
67	Section 5.5.4.4 (Community Agreement Policies in Procurement Requirements) “Another policy approach could be expedited permitting for projects with broad support from local government, tribes, and diverse stakeholders in a “book of agreements”.[JB1] “ [JB1]OTC what does “<i>expedited permitting</i>” (for projects with broad support) mean? How expedited do they mean? It is a slippery slope and should be approached with extra caution because CBAs only require an agreement with at least one impacted community. What if not all impacted communities were included? OSW projects should not be expedited because of their far-reaching negative impacts.	On further consideration, this sentence was removed. There is not likely to be potential for an expedited path under the Federal Consistency review process.

68	Section 5.6: Support Creation of New Economic Opportunities from Offshore Wind, whether there are Turbines off the coast or not AV: Again, I support the comments made at the last roundtable meeting to invert the report structure. It strikes me that this section should have more substance. It seems that there could be a stronger benefit --if one takes a cost-risk approach to this option than to the high risk, high cost approach that goes with development of FOSW	Under the supply chain only path, the actual scale of the opportunity is uncertain and depends on the supply chain needs of other areas developing offshore wind. There is not yet enough information to support a recommendation for significant investment in supply chain fulfillment development, so the actions in this section focus. Question for Roundtable: Should Section 5.6 be moved earlier in Section 5?
69	5.6.1.1 (Articulate and Develop Supply Chain Opportunity for Oregon) AV: Language here is not direct. this seems not yet sufficiently well thought out.	Work is still ongoing to better develop strategic actions for the supply chain, but information is limited and it has been difficult to engage supply chain industries in the Roadmap conversation. Further input and suggestions from the Roundtable would be appreciated.
70	Bobby: Overall note for global edit and consistency - Parallel list structures - use OSW/FOSW consistently - Be intentional on should/must and could/may/might - Watch absolute terms like "ensure" and "require" - Check all links, esp. Fed sources	These comments were incorporated during editing. Should/must and could/may/might word choice were based on my best judgment of what the state can require vs. what the Roadmap is recommending. The state might turn some of the should's to must through establishment of policies, but I wanted the Roadmap to reflect current reality so as to not introduce confusion in readers. This is open for discussion or inquiry into specific instances, as there may still be errors.