



DLCD

Department of
Land Conservation
& Development

Oregon Offshore Wind Energy Roadmap

Public Comments and Responses



July 2026

Summary

The Oregon Offshore Wind Energy Roadmap was released for formal public review and comment from February 17th through April 27th, 2026. During the comment period, DLCD hosted a total of eight public meetings (five in person along the coast and three virtual meetings) to describe the contents of the Roadmap and accept formal spoken comments. In total, DLCD received 317 formal written comments and 28 oral comments provided at public meetings. DLCD also received comments in the form of presentations offered by five teams of high schoolers participating in a Youth Voices on Offshore Wind engagement effort led by Oregon's Kitchen Table. Finally, DLCD received 160 responses to an online survey that invited the public to provide an alternative means of providing feedback on the Roadmap.

Public feedback with DLCD responses to these comments can be found below, as identified here.

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Cover Photo Credit: Andy Lanier

Table 1. Written Public Comments and DLCD Responses

Name	Comments	DLCD Response
Kathleen Neill	Thank you for asking for Oregonians' feedback. I am a fifth generation Pioneer Oregonian and proud of my State. Green Energy is necessary for our future and the Oregon Legislature strives to provide for our future generations. I will continue to support you in every endeavor.	Thank you for your comment.
Thena Lyons (1)	STOP SPENDING OUR TAX DOLLARS ON THIS SCAM THAT HAS BEEN PROVEN BY BOEM TO RUIN OUR FISHING INDUSTRY, RAISE OUR ENERGY PRICES, RUIN OUR EMPLOYMENT, OUR WAY OF LIFE, OUR TOURISM! YOUR AGENCY IS GREEDY AND EVIL! GO AWAY AND LEAVE OUR PACIFIC NORTHWEST COASTAL ALONE!	Thank you for your comment. A primary purpose of the Roadmap is to reflect concerns Oregonians have about the potential for offshore wind energy development and provide recommendations that may protect the interests of the people and resources of the state in future decisions. The Roadmap process considered the interests expressed in this comment which is reflected in the policy recommendations and actions in the document. No further state funding is currently planned to implement the Roadmap, but the Roadmap recommends investments that the state could make to strengthen its policies, improve the decision-making process, and prepare for the potential of future offshore wind energy development to help the state meet its energy and climate goals <i>if</i> it can be done responsibly.
Thena Lyons (2-4)	<i>The following 4 emails sent to S. Carney.</i> <i>"Wind Turbines. Seriously?" email sent 5:43 pm with eight video downloads possible.</i> <i>"Wind Turbine Scam" email sent 5:48 pm with two videos: Video _3 (6 MB); Video _1 (2 MB)</i> <i>"Wind Turbine Scam" email sent 5:49 pm with nothing included</i> <i>"Turbine Scam" email sent 5:50 pm with one video: Video (12 MB)</i>	Thank you for your comment.
Kevin Bennett	I am a commercial fisherman out of Newport, Oregon and b work off the Oregon coast from Warrenton, Oregon to Bandon, Oregon once again Oregon is wasting money and funds and energy and resources by exploring the seemingly impossible implementation of offshore wing farms. The citizens of Oregon, including the tribal communities expressed great concern about the environmental impact these wind farms would have on our oceans. 1) Hazards to navigation; 2) Hazards to Birds; 3) Hazards to Migratory Mammals; 4) Deterioration of scenic views; 5) Environmental Hazards from lubricating fossil fuels for turbines; 6) Limiting Access of Commercial Fisheries	Thank you for your comment. A primary purpose of the Roadmap is to reflect concerns Oregonians have about the potential for offshore wind energy development and provide recommendations that may protect the interests of the people and resources of the state in future decisions. The Roadmap process considered the interests expressed in this comment which is reflected in the policy recommendations and actions in the document. No further state funding is currently planned to implement the Roadmap, but the Roadmap recommends investments that the state could make to strengthen its policies, improve the decision-making process, and prepare for the potential of

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	If you want to study feasibility, look at the Tera Ferma coast line. Keep the wind farms out of our oceans, and frankly quit wasting tax money on issues that have had an overwhelming opposition from our citizens.	future offshore wind energy development to help the state meet its energy and climate goals if it can be done responsibly.
John Bragg	Hello, Jeff & Team, Congratulations to you and the team. The Offshore Wind Energy Roadmap draft thoughtfully presents a complex topic clearly with logical and consistent divisions of general, technical, process-driven and organizational data. The graphics are very nice. Looking at these now, in the context of this draft, it seems that the original roadmap strategy--with off-ramps--has smoothly morphed into the futures-planning scenario. Futures-planning was a confusing concept at times as we worked to understand the off-ramps. At times I feared the futures concept had served only to muddy waters that were already murky enough due to the complexity of the issues. However, in reading this draft, I am struck by how well these two themes end up complementing each other. Down the road, when the users of this plan discern an off-ramp looming ahead, I suspect they may be drawn back to this plan to ask: Is this a point at which we must choose--or choose to set aside--one or more of our planned-for possible futures? Or conversely: Does an apparent potential clash of possible futures necessitate a need for us to take an off-ramp? Time will tell; but I think the team has developed a roadmap that will help future users get through these (relatively) uncharted waters. (Please forgive the mixed metaphors in that paragraph!) Thanks for the opportunity to be a part of this process. Responses to your specific questions follow. PS - I applaud the division into a roadmap document, executive summary, and separate volume with the appendices.	Thank you for your comment.

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	1. How well do the guiding principles in Section 3 reflect what you believe should guide future actions and decisions around offshore wind energy in Oregon? Sec 3.1 P27 intro box: "The principles guide how any decision about offshore wind energy development should be made—regardless of the outcome. Think of them as expectations for decision-making processes to foster decisions that are informed, transparent, and equitable." Moving forward, it may happen that one or more of the futures scenarios -- which now might seem uncertain or arbitrary -- may become (or be reformed as) a certainty forcing a decision point. The Team should approach such decision points cautiously, and remember that the core of futures-planning lies in embracing uncertainty rather than striving to eliminate it. Considering the time scale for offshore wind planning, it might happen that, as planners home in on a preferred (or at least a possible) future, the options they set aside will not simply go away. At a later point, as circumstances change, a scenario previously set aside may take on new importance. Social or technological changes may even demand considering new futures that were unrecognizable when this offshore-winds planning effort concluded. Off-ramps that were helpful early on might come in handy again! 2. Are the descriptions of the alternative futures in Section 4 appropriate, and are there other markers of success or considerations that should be considered? Generally, yes. However, futures vaguely glimpsed and planned for today may, with time, begin to appear fixed in stone (or bureaucracy). Planners (in the future) should keep in mind that the futures-planning process we have begun, ideally, may not end. Alternatives inconceivable today may (and likely will) come to dominate future decision-making. Ideally, future users of this plan will recognize, and be ready to respond to, changing futures--as they arise--and when their potential benefits exceed the value of our considerations today. One marker of success: Copies of the Plan become worn and dog-eared lying on decision-makers' desks. 3. Are there additional important steps along the pathways to the alternative futures that you don't see reflected in Section 4 or in the	1. Thank you for the comment. The change from "exit ramps" to "checkpoints" within the Roadmap is reflective of conversations among the advisory Roundtable that envisioned potential futures scenarios where the state begins on one path and switches to another at a critical juncture as more information becomes available. 2. The point is well-taken that additional future paths may reveal themselves in time. The Roadmap has been revised to include this point in Section 4. 3. Thank you. 4. Thank you. 5. Thank you. 6. Thank you.

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	actions described in Section 6? Perhaps to keep in mind that futures-planning is ongoing, not a one-time, do-it-and-be-done, process. See comments on Q-2 above. 4. Are there additional policy gaps or recommendations not considered in Section 5 or in the Enforceable Policy Assessment in Appendix A? No comments 5. Do you have any information or preferences that could affect the prioritization of actions in the summary table included in Section 6.8? No comments 6. What other general thoughts do you have about the paths, opportunities, and priorities for Oregon related to offshore wind energy going forward? Should Oregon find that the process of futures-planning employed in developing the offshore winds plan was helpful, I envision a future in which DLCD explores opportunities to formally incorporate futures-planning more broadly within the state's environmental decision-making processes -- generally -- but also specifically, as when project-planning implies drastic physical changes to our natural environments and affects the quality of life, especially in rural communities.	
Katleen	Why are you wasting taxpayer dollars on a dead horse?	Thank you for your comment. No further state funding is currently planned to implement the Roadmap, but the Roadmap recommends investments that the state could make to strengthen its policies, improve the decision-making process, and prepare for the potential of future offshore wind energy development to help the state meet its energy and climate goals if it can be done responsibly.
Jennifer White Curry County Republicans, Chair	As the Chair for Curry County Republicans, I appreciate being able to provide comment on behalf of Curry County voters. On November 5, 2024, in the Oregon General Election, the Citizens of Curry County Voted on the Advisory 8-116. This advisory question seeks to determine if Curry County voters want to stop floating offshore wind turbine development along the southern Oregon coast. It is needed because the current Federal Bureau of Ocean Energy Management (BOEM) plans may not adequately protect Curry County citizens from possible: The results of this vote were 79.75% Yes and 20.25% No. Citizens	Thank you for your comment. Section 2.4 (Oregon Offshore Wind Energy Permitting Process and Roles) of the final Roadmap includes a subsection dedicated to the local government role in the offshore wind energy regulatory process. Within this new section, additional information has been included about the 2024 local referenda in Coos and Curry Counties. A primary purpose of the Roadmap is to reflect concerns Oregonians have about the potential for offshore wind energy development and provide recommendations that may protect the interests of the people and resources of the state in future decisions. The Roadmap process

Name	Comments	DLCD Response
	want to stop all floating offshore wind turbine development in Oregon. All 27 of the precincts in Curry County voted a resounding YES. The citizens of Curry County strong opposition to The BOEM Offshore Floating Wind Turbine Project. BOEM desiring to move forward with this project is greatly disappointing and is ignoring the desires of Curry County Citizens. We ask that you STOP all efforts. Reasons we Oppose 1. Harm to both Coastal Ocean and Inland Environments. 2. Collapse of Local Commerce. 3. Reduction of Aesthetic and Visual Beauty. 4. Higher Taxes and Increased Utility Rates. 5. Hazardous Coastal Navigation. 6. Instability Within the Cascadia Subduction Zone. 7. Noise Pollution. 8. Devaluation of Residential, Commercial, Agricultural, and Forest Property. 9. Harmful Changes in Weather, Wind, and Wave Patterns. 10. Degradation of Oregon Southern Coast Living. Explanatory Statement (refer to email for the remainder of the email)	considered the interests expressed in this comment which is reflected in the policy recommendations and actions in the document. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.
Dayna Mitchell	Wind energy is useless and damaging to Sea life. So just get over yourselves and drop this ridiculous idea	Thank you for your comment. A primary purpose of the Roadmap is to reflect concerns Oregonians have about the potential for offshore wind energy development and provide recommendations that may protect the interests of the people and resources of the state in future decisions. The Roadmap process considered the interests expressed in this comment which is reflected in the policy recommendations and actions in the document.
Karie Silva (1) Roundtable member	Thank you for the work that has gone into this Offshore Wind Energy Roadmap. As Oregon considers a potential pathway forward, this document must clearly identify the statutory guardrails necessary to ensure durable and responsible policy. If the state proceeds, development should occur within defined limits. I strongly urge inclusion of a 3-gigawatt statewide cap. This is not a prohibition on offshore wind — it is a governance safeguard. A defined cap ensures cumulative impacts are evaluated at a statewide ecosystem scale and requires explicit legislative authorization before	Thank you for your comment. While the conversations among the advisory Roadmap Roundtable did not reach consensus on whether the state should formally establish a cap on the maximum amount of offshore wind energy development it is willing to consider, the callout box of Table 4-7 in Section 4.4.1 (A Pathway Focused on Increased Energy Production, Climate Change Mitigation, and Job Creation) of the Roadmap describes how a cap may provide assurance to fishing communities and others concerned about the possible scale of development effects. The discussion in the Roadmap is intended to

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	expansion beyond that threshold. Research and monitoring are essential, but they must be paired with enforceable action. Monitoring should trigger defined reassessment standards if impacts to Essential Fish Habitat, renewable fisheries, or marine ecosystems are documented. Without measurable thresholds, we risk relying on discretionary evaluation rather than objective criteria. Oregon retains authority under the Coastal Zone Management Act to condition federal actions for consistency with enforceable state policies. That authority should be used to ensure decommissioning standards, habitat protections, and stakeholder safeguards are binding — not aspirational. Oregon’s commercial fisheries are renewable food systems protected under state and federal law. Protecting them must remain central to any offshore wind pathway. Clear development thresholds, enforceable standards, and legislative oversight will ensure Oregon moves forward responsibly, consistent with its longstanding commitment to precautionary ocean stewardship. Thank you	support and inform any policy discussions that may occur in the legislature. DLCD agrees that monitoring of project effects is essential to understand and manage risks and uncertainties that remain if a project is permitted to proceed. DLCD also agrees that prescribed, enforceable triggers for action would strengthen the state's role and authority in adaptive management processes. The policy assessment in Section 5 recommends that Territorial Sea Plan Part Five undergo revision to provide additional detail and clarity regarding adaptive management plan expectations. Section 6.3.2 (Action: State-led spatial planning inventory of marine and coastal zones to inform federal siting and Territorial Sea Plan updates) of the Roadmap also describes a strategy for adaptive management the state may employ, using its federal consistency review authority, to establish enforceable triggers for response actions based on monitoring results. Additional details have been added to this section in consideration of this comment. DLCD agrees with the points made about the state's opportunity to use its federal consistency authority to establish clear decommissioning standards, protect habitats, and support binding community safeguards based on its enforceable policies. Additional language has been added to Section 2.4.3 (Federal Consistency and the 2024 BOEM Leasing Review) to further describe the state's federal consistency authority, in the context of the 2024 BOEM leasing decision conditions, and the opportunities to further condition projects at the permitting stage. Section 6.3 also includes new discussion about federal consistency reviews as the state's clearest and strongest opportunity to influence, condition, or object to an offshore wind energy project.
Henry Cunningham	Offshore wind is a renewable energy source along the Oregon Coast. This is in contrast to fossil fuel energy that is non-renewable and unreliable. As a concerned citizen and resident, I believe the issue warrants thorough analysis and vetting. I do not believe that it should be written off prematurely based on conjecture or fear of change.	Thank you for your comment.

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Hal Lowry MD	I want to comment only on the “aesthetic” aspect of this project. We have one of the most beautiful coasts in the entire world. It is a marvel for everyone who drives up and down 101, walks the beach, or embarks on our beautiful ocean. It is pristine, unblemished, and completely natural at this point. Many Oregon statutes have protected it. The introduction of man-made monoliths anywhere on the near coast would be a travesty. It would completely alter the aesthetic of this gem that we have been given to protect. I have always been in favor of alternative energy, but I think offshore wind projects are ill-advised. Nor would I want an oil derrick sitting just off our coast. A better idea, I think, would be to place wind turbines in large areas of already logged federal or state land. These would largely be out of vision, they could be on hilltops, accessed by already used and maintained logging roads, and I believe could be at elevation and would be taller than replanted trees would ever achieve. Remember, we have a president now, and potentially future presidents, who are against wind energy described as “windmills” and have run on a platform that includes the mandate to “drill baby drill.” With a stroke of his sharpie this president could cancel wind programs, as he has already done with other forms of alternative energy.	Thank you for your comment. The visual impact from offshore wind energy development was a significant topic of conversation during Roadmap Roundtable advisory group discussions. The Roadmap recognizes the importance of updating the state's visual resource standards, considering the example of offshore wind energy specifically, so that any future siting and permitting for proposed offshore wind projects consider values of state and coastal communities. The recommendations in the Roadmap include visual resource models and viewshed effect valuation studies in addition to updates to visual policy standards within the Oregon Territorial Sea Plan. The point about the relative benefits and consequences of siting onshore wind projects on harvested coastal forestlands was researched further in response to this comment. While the state has no policy encouraging or discouraging the siting of turbines onshore in the coastal zone, there are challenges that may explain why it has not been pursued to date. Onshore wind farms require smooth, unimpeded wind flow. The steep terrain, dense forests, and rugged coastline of the Oregon Coast disrupt wind patterns, making turbines much less efficient. Additionally, getting electricity from undeveloped lands in the coast range would require significant transmission infrastructure and upgrades, which would likely be technically challenging and expensive. Onshore coastal wind energy remains a potential option, however, to help Oregon meet its energy and climate goals.
Hal Lowry MD (2)	<i>duplicate of previously submitted email, except for "Sent from my iPad" message before his signature.</i>	

Name	Comments	DLCD Response
Albert Geiser (1)	Potential Gap, Emergency Planning, Kulluk, a name to remember! This is a cautionary tale of a giant drilling platform with a superstructure standing 253 feet above the waterline, presenting a huge sail area. This unpowered “buoy” was designed to be anchored with twelve anchors in depths of up to 400 meters. While under tow from Unalaska to Seattle by the 360 ft anchor handling tug Aivig (Aiviq, which is now US Coast Guard Cutter Storis) with a bollard pull of 208 tons. Approximately ten days into the voyage, the tow connection failed roughly 50 miles from Kodiak Island. The Kulluk eventually drifted ashore on Sitkalidak Island on December 31, 2012. This occurred after three other tugboats and the Coast Guard Cutter Alex Haley attempted to tow the Kulluk to a safe anchorage. The winds and sea state at the time were equivalent to those not uncommonly found in the Pacific Northwest along the continental shelf. The proposed wind generator turbine blades will reach 750 ft and, depending on the final design, weigh between 2 and 8 thousand tons (one thousand tons equals 2 million pounds) and will require several towing and anchor handling vessels to place the projected 1,600 turbines in California waters and hundreds more offshore in Oregon waters. This proposal has not been tested in the depths of the eastern Pacific shelf, and, if implemented, could lead to two likely disaster scenarios. First, one of the towers drags its anchor into another, breaking all anchor points. Second, a disabled cargo ship drifts through the picket line of towers and collides with one, setting it adrift. This tale of a single “buoy” breaking loose, with five capable tow vessels on scene and unable to prevent the grounding, offers great insight and raises many more questions. Respectfully, Albert Geiser, Port Orford References: NTSB Accident # DCA13NMO12, The New York Times Magazine “The Wreck of the Kullu, Wikipedia	Thank you for your comment. The Roadmap now includes marine transportation accident response as an effect of concern in Table A-4 of Appendix A (Enforceable Policy Assessment) and is recommended for consideration in any future federal consistency review if a project is proposed in the future.

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Mike Train	The first task for any project is to show economic justification. That is not being demonstrated for this project. Available information from other Offshore Wind Energy installations show that this project will not produce power at a favorable cost. Because of this fact, I strongly oppose the project.	Thank you for your comment. The Roadmap is not a vehicle by which the state will decide whether to pursue offshore wind energy or whether to approve or oppose any specific project. It is a planning and recommendation effort to identify standards, processes, or actions the state should apply to any future offshore wind energy decision-making effort. The Roadmap in Section 6.2 (Achieve State Energy and Climate Policy Objectives) recommends additional assessment of offshore wind energy economic costs and opportunities - beyond the metric of levelized cost of energy alone - in any future revisions of the Oregon Department of Energy's Oregon Energy Strategy. The Roadmap also discusses potential future scenarios where the purchaser of the power produced by turbines off the Oregon coast live in areas (such as other states) where the cost of power is more competitive, and it recommends transboundary equity discussions to address any negative effects Oregon might experience to further the energy needs of another state. In the meantime, the Roadmap also recognizes that the decision to propose offshore wind development is a federally-led process that may occur regardless of the state's position, and it recommends actions the state can take in the near-term to update its policies and establish improved decision-making processes that strengthen the state's position in federal permit reviews.
Karie Silva (2) Roundtable Member	<i>Please refer to the 9-page letter dated March 11, 2026 by Karie Silva</i>	<i>Responses to points made in the attached letter appear separately.</i>
Jeff & Wren McCulloch	As Concerned Citizens of Curry County, we believe the SAFEST Answer for the Environment as well as the Long Term Health of all Animal, Marine & Human Life is a resounding NO Offshore Wind Farms! This Form of Energy is NOT Clean OR Green as it utilizes Petrochemicals in the Fiberglass Construction as well as the Petroleum Lubricant within the Structure. LEAKS happen even as the Chemicals applied to the Structure to prevent them will fail & cause UNTOLD HARM to the Oceanic Environment. When inserted into the Ocean Floor, the Damage done to the Integrity of the Sea & ALL Life Forms that depend on that Stability is BEYOND description.	Thank you for your comment. A primary purpose of the Roadmap is to reflect concerns Oregonians have about the potential for offshore wind energy development and provide recommendations that may protect the interests of the people and resources of the state in future decisions. The Roadmap process considered the interests expressed in this comment, reflected in the policy recommendations and actions in the document. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were

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	Curry County is also located within the Cascadian Subduction Zone that is Part of the Region known as the RING OF FIRE. According to the Well-Documented SCIENCE of the USGS, "The Ring of Fire is the most seismically and volcanically active zone in the world." Within the Ring of Fire such Seismic & Volcanic Activity ALSO produces Tsunamis of potentially DISASTROUS Magnitudes Just check the History of Crescent City, CA which is the TSUNAMI CAPITOL of the United States ONLY 26 Miles away. It makes NO Environmental Sense to place Offshore Wind Farms in such VOLATILE Locations where SERIOUS Structural Failures would cause SO MUCH HARM to BOTH People & Planet! As if ALL these Environmental Issues were not enough to raise a RESOUNDING NO to this Question, the Financial Burden to the People purchasing Power from these Energy Companies is SHOCKING. Many Communities on the East Coast are now paying as much a 4X MORE for their Energy than they did BEFORE. There have also been NUMEROUS documented DEATHS of both Land & Marine Life in these Areas as well. More Money spent & MORE HARM to Life Forms & the Environment just doesn't make ANY Sense! PLEASE put the Environment FIRST & consider other SAFER & more affordable Options that help us ALL as we answer the PROTECT THE PLANET Call! With GREAT Concern for Curry County, the State of Oregon, the State of our Nation & the World at Large, it is TIME to put Environmental Stability IN CHARGE of the Decisions we as a Global Community make because OUR OWN SURVIVAL as a Planet is TRULY at Stake!	evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.
Lynn Coker Roundtable member	<i>In addition to the following, please refer to the 4-page document with additional comments.</i> Attached please find Curry County's executive-level response outlining several areas where we believe the Roadmap would benefit from additional clarity and strengthened policy direction. In particular, our comments focus on three issues that we believe are essential for responsible state decision-making regarding offshore wind development: First, the Roadmap should incorporate a requirement that developers provide a comprehensive and transparent lifecycle financial analysis of	Thank you for your comment. Responses to each individual point are provided for the attached letter separately.

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	any proposed offshore wind project. Such analysis should clearly disclose the full financial implications of a project, including anticipated public subsidies, transmission infrastructure costs, potential ratepayer impacts, taxpayer exposure, and long-term decommissioning obligations. Oregon ratepayers and taxpayers should be able to clearly understand the full financial “good, bad, and ugly” associated with project approval over the entire project lifecycle. Second, we believe the Roadmap should more explicitly address how the State of Oregon will incorporate and enforce community protection standards expressed through county-level referenda. In Curry County, voters have clearly articulated concerns regarding offshore floating wind turbine development. Our view is that the State should play an active role in ensuring that protection and mitigation requirements reflected in such referenda are meaningfully incorporated into project evaluation. If those standards cannot be met by a developer, the State should halt further consideration of the project. Third, our response outlines several areas where stronger policy guidance would help ensure that offshore wind development does not undermine coastal industries, fisheries, maritime operations, or the long-term economic stability of Oregon’s coastal communities. Our intention in providing these comments is constructive. Curry County recognizes that the Roadmap is an evolving policy framework, and we believe the additions suggested in our response will strengthen the State’s ability to evaluate offshore wind proposals in a transparent, balanced, and economically responsible manner. We appreciate DLCD’s continued engagement with coastal communities on this issue and look forward to continued dialogue as the Roadmap moves forward. Please feel free to contact me if further discussion would be helpful.	
Christopher Hall (1) Water League	<i>Please refer to the 3-page letter dated March 11, 2026, by Christopher Hall on behalf of Water League.</i> Thank you for hosting the community meeting in Brookings last night on the Offshore Wind Energy Roadmap. I very much appreciated your presentation, the Q&A, and the public comment period. Please see attached a copy of my public comments delivered yesterday for your files and the public record.	Thank you for your comment. A response to the attached letter is included separately.

Name	Comments	DLCD Response
Leigh Anderson	<i>Photos and hyperlinks not included. Please refer to original email.</i> By way of introduction, until October '25 I was a senior industries intelligence analyst/economist for Siemens (Siemens is 70 Billion Euros FY25 revenue). Siemens GAMESA, part of Siemens Energy group is a top supplier of offshore wind turbines. I covered energy/infrastructure/chemical industries as my specialty. The following opinions do NOT represent Siemen's point of view - only my own personal opinion based on years of study of alternative energy. Does Oregon offshore have adequate WIND? yes, much of the year, though steady strong winds are largely concentrated in the winter when rough sea conditions, maintenance and breakdowns are most likely. Does Oregon have an extremely harsh winter sea condition? YES! and OFTEN, and EXTREME. Are offshore wind turbines vulnerable to EXTREME sea conditions common in Oregon winters? YES! Peak winter storm events can readily generate significant wave heights of 20–30 feet 20–30 feet (6–9+ meters), with extreme winter events reaching nearly 50 feet. Salt spray in winter storms can pound the blades to severe inefficiency. 1. Extreme erosion of blades that travel at very high speeds through salt spray, especially on the tips. Even minor erosion of the leading edge reduces energy efficiency materially. Wind turbine blade erosion, particularly at the leading edge, is caused by rain, hail, salt spray and dust, leading to material degradation, increased roughness, and up to 50% efficiency loss. Damage typically progresses from small surface pits to deep gouges and coating delamination, usually worst near the blade tips that are most vulnerable to salt spray at around 200mph / 90 m/s on	Thank you for your comment. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including winter storm survivability and potential effects to state coastal areas resulting from turbine or mooring equipment failures and associated parts landing on beaches or sinking to result in species or habitat consequences. Effects from hazardous materials such as hydraulic oil are also represented, but pollution from blade erosion was not previously considered and has been added as an effect that should be subject to review in any future offshore wind project permit review. Several of the points in this comment relate to the overall economic lifecycle efficiency and cost of a project, which in turn may affect project profitability and energy costs to ratepayers. Points also raise concerns about project support infrastructure costs such as port upgrades and transmission, which may be borne by taxpayers as indirect costs. These concerns relate to other comments and suggestions for the Roadmap to recommend a requirement for detailed cost-benefit analysis and lifecycle financial disclosure prior to project approval and power procurement decisions. The recommended action in Section 6.2 (Achieve State Energy and Climate Policy Objectives) related to the need for a coherent energy strategy and comprehensive cost-benefit analysis has been expanded based on this and other similar comments. Larger questions of project economic viability would be within the of a project developer to consider when deciding whether to move forward with a project proposal, but they are well-taken considerations for the state as well when deciding whether and how to invest

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	their down portion of their stroke. 2. Gearboxes in the turbine housings are known to fail in meaningful frequency due to the extreme torque they have to deal with. They weigh 85 metric tons or more and cost many millions of \$. Replacing blades and gearboxes is extremely difficult even in moderately bad seas - to quite impossible during winter storms. Causing weeks, months to even most-of-winter of downtime. This dynamic is often under-estimated and impairs ROI tremendously. More evidence against offshore wind's economics generally: Evidence of Uneconomic Performance: • Contract Cancellations and Renegotiations: Major developers like Ørsted, Equinor, BP, and Avangrid have canceled or sought to renegotiate contracts, facing significant financial penalties or losses. • Siemens GAMESA has incurred Billions of \$ in excess warranty repair losses, as have other major offshore wind suppliers. These machines are not reliable enough in offshore extreme parts of the ocean like Oregon. • Rising Costs vs. Projections: The U.S. Department of Energy and Reddit community discussions projected Levelized Cost of Electricity (LCOE) for offshore wind was initially estimated to be around \$49/MWh by 2030, but recent projects show actuals between \$60 and \$80/MWh or higher. especially in seas known for very high waves and wind. • Inflation and Finance Rates: Rising interest rates (from below 1% to over 5%) have increased financing costs for capital-intensive projects, while inflation has raised raw material prices. • Jones Act Restrictions: The requirement to use US-built, owned, and operated vessels under the Jones Act increases costs and causes delays. The giant crane ships needed for the latest very tall wind turbines are rare and expensive. For installation and for maintenance, it may take months to get one let alone two or three. • Performance Degradation: Research indicates that offshore wind turbine performance can degrade quickly—on average 4.5% per year—reducing output and increasing maintenance costs over time • Subsidies Dependency: Critics argue that without heavy state mandates and subsidies, such as renewable energy credits, these	resources in preparing for the potential of offshore wind energy development. The Roadmap recommends near-term actions for every potential pathway that DLCD believes could benefit state coastal management and prepare the state for multiple potential energy and coastal development futures. The environmental effects of concern described in this comment are represented in Appendix A (Enforceable Policy Assessment) and were considered as part of the Enforceable Policy Assessment embedded within the Roadmap. Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) also discusses recommended measures the state can take to protect the environment and species as part of any future offshore wind energy decision-making process, and it is intended to address the types of environmental impact concerns included in this comment.

Name	Comments	DLCD Response
	projects would not be financially viable. • Infrastructure Costs: The need for substantial grid upgrades and specialized, costly infrastructure (e.g., specialized ports and installation ships) adds to the total cost, often borne by taxpayers. • INTERMITTENCY: wind is not reliable baseload power especially in the summer months wind can be less reliable. Just Don't do it. Sincerely, Leigh Anderson (I can do more rigorous analysis with citations if interested, but this is mostly from memory. I don't have my Siemens data and proprietary research services subscriptions anymore.) P.S. ENVIRONMENTAL IMPACTS 1. Bird deaths! Millions of seabirds are at risk. It's a major flyway and for resident populations 2. Whales. The quite high number of construction ships and boats and then maintenance will be right on top of gray whale and other whales PRIMARY migration route between Baja and Alaska. Boat strikes can and do kill or injure whales. 2. NON-Recyclable blades. They degrade very often in offshore rough conditions and can't be recycled and end up in massive landfills. They are made from petroleum products (epoxy esp). See picture below from West Texas. 3. Carbon debts! The massive amount of concrete and steel and epoxy causes very large carbon release during manufacture, transport and maintenance.	
Youth Voices on Offshore Wind	<i>Please refer to the Youth Voices on Offshore Wind Presentation Transcript for the five following five teams.</i> <i>Team 1: Zoe Mambu, Fatima Jimenez, Eden Johnson</i> <i>Team 2: Derica Theobald, Isaac Lu, Haoxiang Zhu</i> <i>Team 3: Bryce Wilson, Jake Butlin</i> <i>Team 4: Agatha Patane', Juniper Ward, Mirabelle Chen</i> <i>Team 5: Riley Thammakhoun, Sahasra Vutukuri, Zirui Zhu, Fiona Zhang</i>	

Name	Comments	DLCD Response
Pamela Blake	Just my two cents for what it's worth. This is dumb. Wind and solar just don't pencil out. We also don't know the effect off shore wind turbines on wildlife. The OR coast is a known route of whale migration. What will this do to that population? Build an oil/gas refinery in Coos Bay, instead. Fossil fuels are by far the most reliable and the cheapest form of energy. Let's stick with them. Thank you,	Thank you for your comment. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future. Because the Roadmap is focused on future pathways associated with offshore wind energy specifically, it does not make recommendations about whether the state should instead pursue other forms of energy or coastal development to meet its energy, climate, or economic goals.
National Wildlife Foundation (NWF) Action Fund Advocates	<i>204† NWF Action Fund Advocates submitted the same form letter.</i> To: Oregon Department of Land Conservation and Development Thank you for the opportunity to provide input on the Public Review Draft of the Offshore Wind Energy Roadmap. In order to ensure that offshore wind energy development for Oregon only proceeds when it meets high standards for responsible development and wildlife protection, and to make the document more actionable and accessible for decision makers, I recommend: * Highlighting the opportunities to use state level authority to ensure environmental protections at every stage of the process. * Prioritizing science-informed decision-making, research opportunities, and regional coordination regardless of whether or not Oregon chooses to pursue offshore wind energy. * Strengthening requirements for effective community engagement and ensuring that environmental justice concerns are addressed by clarifying the expectations. While offshore wind energy is one option under consideration for meeting Oregon's future energy needs, robust early planning is essential to ensure that any potential development process protects communities and wildlife at every step. Thank you, [First Last Name] <i>†Note: The following 204 individuals submitted this comment.</i>	DLCD appreciates this comment and the strong focus on emphasizing state authorities apply at each stage of the process, prioritizing and pursuing science coordination opportunities under any future path, and strengthening community engagement including clarifying expectations around addressing environmental justice in offshore wind energy-related processes. In response to this comment, the Roadmap has been changed in the following ways: -- Section 2.4 (Oregon Offshore Wind Energy Permitting Process and Roles) relating to the Oregon permitting process has been revised to clarify when and how state and local authorities can influence environmental protection outcomes across the entire lifecycle of an offshore wind energy project. The introduction to Section 6.3 (Protect the Environment and Species (Marine, Terrestrial, Estuarine, Freshwater)) has also been revised to more clearly communicate how the recommended policies and actions would be implemented through state authorities. -- The Roadmap now recommends that the state pursue science collaboration and proactive marine spatial inventories and planning in state and federal waters regardless of the pathway pursued. Language has also been added to assert the benefit of taking these actions under any path. -- Community engagement in offshore wind energy decision-making will adhere to Statewide Planning Goal 1: Public Involvement. The Roadmap provides additional recommended actions for state agencies,

Name	Comments	DLCD Response
	<i>Carla Burkhart, Karen Colclasure, Sandra DeWittie, Michael Hoover, Austin Sumpter, Georgia Keeran, Kalie Williams, Andrea Casey, Suzanne Leduc, Nancy Perkinson, Dana Petre-Miller, Scott Kennedy, Shannon Hodgen, Madeline Kemp, Katie Haldeman, Marcia Kerensky, Jane Dewhirst, Sandra Joos, Robert Bresky, Katherine Bettis, Victoria Nautel, Nancy Marshall, Phyllis Rapport, Christine Harris, Donna Souza-Postles, Sam Hathaway, David Carnese, Pam Rensch, Robin Katzenstein, Beth Levin, Peg Reagan, Jennifer Abernathy, James Meyer, Audrey Arguello, Miranda Sutton, Allan and Kimberley Hamilton, Glen Comuntzis, Rachel Cairns, Blake Hottle, Jamie Shields, Samuel Carl, Linda Pippitt, Alice West, Sally Maish, Richard McCombs, Deborah Kreuser, Colleen Francis, Helen Jones, Nikki Breitbarth, Melanie Feder, Jane Roffey Berry, Virginia Pabst, Donna Harris, Leslee Davis, Cynthia Hicks, Ron Berti, Terri Betz, Alton Roundy, Judy Kinsman, Carol Larson, Amy Carter-Kemp, Mona Tubbs, Lilli Ohse, Kathleen Ruiz, Larry Narlock, Jane Jones, David Spackman, Nancy Swann, J Diaz, Bruce Higgins, Kyle Haines, Sandra Elliott, Sharon Ciri, Joanne Moeschl, Susanna Askins, Gary Frye, Melissa Chitwood, Debra Westom, Diana Kekule, and J. David Scott</i> <i>Kate Busby, Betsy Hall, Jaci Harris, Joanna Roberts, Marilyn Costamagna, Damian Latona, Jan Polychronis, Greeley Wells, Stevyn Llewellyn, Mary Beth Davenport, Nancy Fleming, Marie Wakefield, Marsha Benoit, Zach Hober, Adama Hamilton, Joanne Hamblin, Chip Hall, Dave Ruud, Margo Huntsman, Heidi Hart-Zorin, Brent Rocks, Czora Pagsolingan, Tanya Gilula, Linda Miller, Gayla Leopard, Ansula Press, Arlee Myers, Jeanie Lemens, Lindsay Moore, Lise Hull, John Duggan, Barbara Methvin, Marsha Sleeth, Suzanne Fernstrom, Mary Lane Reid, Kimberly Wick (1), Donna Mulvey, Marina Soto, Dena Plemel, Eileene Gillson, Kimberly Wick (2), Dana Bleckinger, Paula Howard, Jeanne Brooks, Veena Singwi, Sarah Welte, Claudia Arcturian, Hilary Tiefer, Diane Rockafellow, Kenneth Kebisek, Laura Johnson, and Maria Banach</i> <i>Michalle Gleason, Judith Mercer, Jackie Yung, Georgeann Courts, JoEllen Mayer, Setsuko Maruki-Fox, Shirley Wright, Ann Nowicki, Danielle Stutheit, Gail Harris, Steph Spencer, Susan Zimmerman, Teresa Benson, Patricia Pomeroy, Sandra McCarthy, Ann Hollyfield, Nina Council, Katharine Hopkins, Jane Bartosz, Ruth Wire, Bobbee Murr, Patricia Heacock, John Rudolph, C C, Mick Alderman, Randy Harrison,</i>	local governments, and developers to follow in order to achieve effective and meaningful engagement on the topic of offshore wind energy in the future. The Roadmap also includes a new recommended action in Section 6.1 (Effective and Meaningful Engagement with Affected Communities), recommending the creation of a community engagement fund that could be allocated to community groups and local organizations to support community engagement activities and needs.

Name	Comments	DLCD Response
	<i>Lyric Apted, Jeanne Prince, Antar Pushkara, Gina Norman, Jurissah Naïve, James Moos, Michelle Graas, Jennifer Loomis, Brian Whalen, Tabitha Donaghue, Anne Ackley, Robert Hammond, Stacie Hall, Gail Battaglia, Brett Baumann, Vivian Dowell, Allison Everitt, Ross Huffman-Kerr, Kaleigh Lucas, Audrey Collins, Wolf Krebs, George Stevenson, P. Quillian, Reagan Saxton, and Tom Beatty</i> <i>Donna Grubbs, Michael Renfrow, Elise Capley, Ester Friedman, Monique Williams, B.D. Bell, Janet Schiering, Amy Roberts, Cierra Buer, Mary Nuss, Robin Jenkins, Phyllis Grove, John Herberg, Karylyn Morgan, Shirley Williamson, Amilyiah Proctor, L. DeMille, Shane Wolfe, Michael Calhoon. Jessica Holsen, and Sharon Matticola</i>	
Donna Bonetti National Wildlife Foundation (NWF) Action Fund Advocate	<i>The NWF Action Fund Advocate submitted a standard form letter with personalized comments.</i> To: Oregon Department of Land Conservation and Development Thank you for the opportunity to provide input on the Public Review Draft of the Offshore Wind Energy Roadmap. I went to a local meeting about this. I am generally for renewable energy but this is a newer technology and I think more research is necessary before floating wind power can go forward in our area. This should include looking at earthquake and tsunami risks, effect of electromagnetic energy on wildlife, full environmental evaluation and impacts on our communities. In order to ensure that offshore wind energy development for Oregon only proceeds when it meets high standards for responsible development and wildlife protection, and to make the document more actionable and accessible for decision makers, I recommend: * Highlighting the opportunities to use state level authority to ensure environmental protections at every stage of the process. * Prioritizing science-informed decision-making, research opportunities, and regional coordination regardless of whether or not Oregon chooses to pursue offshore wind energy. * Strengthening requirements for effective community engagement and ensuring that environmental justice concerns are addressed by clarifying the expectations. While offshore wind energy is one option under consideration for	DLCD appreciates this comment and the strong focus on emphasizing state authorities apply at each stage of the process, prioritizing and pursuing science coordination opportunities under any future path, and strengthening community engagement including clarifying expectations around addressing environmental justice in offshore wind energy-related processes. In response to this comment, the Roadmap has been changed in the following ways: -- Section 2.4 (Oregon Offshore Wind Energy Permitting Process and Roles) relating to the Oregon permitting process has been revised to clarify when and how state and local authorities can influence environmental protection outcomes across the entire lifecycle of an offshore wind energy project. The introduction to Section 6.3 has also been revised to more clearly communicate how the recommended policies and actions would be implemented through state authorities. -- The Roadmap now recommends that the state pursue science collaboration and proactive marine spatial inventories and planning in state and federal waters regardless of the pathway pursued. Language has also been added to assert the benefit of taking these actions under any path. -- Community engagement in offshore wind energy decision-making will adhere to Statewide Planning Goal 1: Public Involvement. The Roadmap provides additional recommended actions for state agencies, local governments, and developers to follow in order to achieve effective and meaningful engagement on the topic of offshore wind energy in the future. The Roadmap also includes a new recommended

Name	Comments	DLCD Response
	meeting Oregon's future energy needs, robust early planning is essential to ensure that any potential development process protects communities and wildlife at every step. Thank you, Donna Bonetti	action in Section 6.1 (Effective and Meaningful Engagement with Affected Communities), recommending the creation of a community engagement fund that could be allocated to community groups and local organizations to support community engagement activities and needs. Regarding the additional concerns expressed around earthquake and tsunami risk, effects of electromagnetic frequencies on wildlife, and the need for a full evaluation of environmental and community effects, DLCD agrees that these are potential effects of interest that should be fully evaluated if an offshore wind energy project is reviewed by the state in the future. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.
Deanna Schafer City Manager Reedsport	Hello, I am curious as to what the outreach on these meetings consisted of. I believe that I received a notice like this because I am the governing body or because I signed up for notifications. Was there any other community outreach?	Ahead of the meeting in Reedsport, DLCD sent a press release to the agency's media contacts and shared a notice about the meeting over our listserv on February 17th. The original notice went to 9,749 recipients, and there were four additional listserv announcements with meeting information. DLCD also posted on LinkedIn about the meeting and the opportunity to comment on the draft. DLCD staff also gave an interview that was broadcast on Jefferson Public Radio and OPB and included on their websites. Information for the meetings was posted on the DLCD Offshore Wind Energy Roadmap website, and the video from the first virtual public meeting is available on YouTube.
Melissa Reardon National Wildlife Foundation (NWF) Action Fund Advocate	<i>The NWF Action Fund Advocate submitted a standard form letter with personalized comments.</i> PERSONAL NOTE: As much as I support offshore wind as a clean energy alternative, there is an obvious need to find other energy options during this oil crisis. Please also consider: 1) Wave energy options that are less visually and environmentally intrusive, 2) Incentives for more development in energy efficiency: appliances, electronics, data centers,	Because the Roadmap is focused on future pathways associated with offshore wind energy specifically, it does not make recommendations about whether the state should instead pursue other forms of energy or coastal development to meet its energy, climate, or economic goals. The Oregon Energy Strategy, prepared by the Oregon Department of Energy in 2025, considers multiple energy generation options and makes recommendations for continued evaluation and investment in

Name	Comments	DLCD Response
	heating/cooling (such as ac that does not require compressors but uses fluids to manage temperature), and building applications that lower high fluctuations in temperature, and, 3) Small affordable systems for plug in solar energy panels, as used in Europe, sold/leased by power companies to the consumer, that provide on the ground local power sources where extra electricity can be transferred back to the grid as needed to avoid rolling blackouts and lowering the land requirement and economic necessity to build long distance transmission infrastructure, which could be especially efficient in large metro areas like Portland. Thank you. To: Oregon Department of Land Conservation and Development Thank you for the opportunity to provide input on the Public Review Draft of the Offshore Wind Energy Roadmap. In order to ensure that offshore wind energy development for Oregon only proceeds when it meets high standards for responsible development and wildlife protection, and to make the document more actionable and accessible for decision makers, I recommend: * Highlighting the opportunities to use state level authority to ensure environmental protections at every stage of the process. * Prioritizing science-informed decision-making, research opportunities, and regional coordination regardless of whether or not Oregon chooses to pursue offshore wind energy. * Strengthening requirements for effective community engagement and ensuring that environmental justice concerns are addressed by clarifying the expectations. While offshore wind energy is one option under consideration for meeting Oregon's future energy needs, robust early planning is essential to ensure that any potential development process protects communities and wildlife at every step. Thank you, Melissa Reardon	emerging technology options and energy efficiency measures to support Oregon meeting its energy and climate goals.

Name	Comments	DLCD Response
Ken Bonetti (1) National Wildlife Foundation (NWF) Action Fund Advocate	<i>The NWF Action Fund Advocate submitted a standard form letter with personalized comments.</i> To: Oregon Department of Land Conservation and Development I recently attended a OSW Roadmap discussion and was impressed by the care that the Oregon DLCD. I have also read the first third of the Roadmap. Thank you for the opportunity to provide input on the Public Review Draft of the Offshore Wind Energy Roadmap. In order to ensure that offshore wind energy development for Oregon only proceeds when it meets high standards for responsible development and wildlife protection, and to make the document more actionable and accessible for decision makers, I recommend: * Highlighting the opportunities to use state level authority to ensure environmental protections at every stage of the process. * Prioritizing science-informed decision-making, research opportunities, and regional coordination regardless of whether or not Oregon chooses to pursue offshore wind energy. * Strengthening requirements for effective community engagement and ensuring that environmental justice concerns are addressed by clarifying the expectations. While offshore wind energy is one option under consideration for meeting Oregon’s future energy needs, robust early planning is essential to ensure that any potential development process protects communities and wildlife at every step. Thank you, Ken Bonetti	
Christopher Hall (2) Water League	<i>Please refer to the 3-page PDF document for comments.</i> I am resubmitting the transcript of Water League's oral comments delivered in Brookings on March 11, 2026, because I realize that I should have included the special email address for formally submitting comments, which I have done here. Please confirm receipt of this email and the file attachment. Please note that Water League will be submitting more extensive formal written comments before the April 3, 2026, deadline.	Thank you for your comment. A response to the written and oral comments by the Water League is provided separately.

Name	Comments	DLCD Response
Ken Bonetti (2)	Dear DLCD, My name is Ken Bonetti from North Bend, Oregon. I attended your presentation here on March 9. I was impressed with the organization of your presentation and its excellent delivery. Even more so, I am impressed by your commitment to informing the public and taking input from ordinary citizens. You seem sincere and truly willing to listen, which seems to be a rare commodity these days. I have taken some time to read through a good portion of your document and have been equally impressed with your careful dedication to providing clear and comprehensive information and a strong commitment to applying the best science and data analysis available in analyzing floating offshore wind and its various potential community and environmental impacts. Your stated commitment to energy justice is likewise appreciated. I also am impressed by your willingness to consider the do-nothing option along with a range of other options through full engagement in a large-scale floating offshore wind project. The public needs to understand the full range of possibilities and each of their ramifications. The DLCD seems truly dedicated to doing a quality service to Oregon citizens and other residents by carefully considering all aspects of this potentially monumental undertaking. Let's hope the politicians allow you to do your job and provide adequate resources for you to do the best job you possibly can. My principal concerns are social and environmental impacts, particularly on communities, vulnerable and under-represented populations, and on marine and shore wildlife including the circulation of nutrients along the prevailing ocean currents within which a future project might be situated. I can fully accept floating offshore only when all the data is in and we have had a chance to	Thank you for your comments. The topic of a larger renewable energy strategy was discussed at the May 2026 Offshore Wind Energy Roadmap Roundtable meeting, which is available to view online. The general consensus of the advisory group was in agreement with the idea that additional analysis is warranted to understand the relative benefits and tradeoffs between offshore wind energy and other forms of renewable energy, across a variety of factors, to inform whether and how the state invests in energy options. Additional language has been added to the recommended action in Section 6.2 to emphasize the need for a coherent energy strategy through refinements to the Oregon Department of Energy's Oregon Energy Strategy, including additional cost/benefit analysis. Regarding the concept of public ownership of an offshore wind energy project, the Roadmap does not constrain or recommend who may act as the developer of a project. Under current laws, a public organization such as a community energy group or Public Utility District could theoretically pursue offshore wind energy or purchase a constructed project from the original developer, though the high capital costs and scale of projects may present barriers to full ownership. Public groups may also elect to purchase power produced from a project through a Power Purchase Agreement. While DLCD recognizes the comments made in support of public ownership options, no specific recommended standards or actions have been identified for inclusion in the Roadmap to constrain or promote certain types of project owners over others.

Name	Comments	DLCD Response
	evaluate it thoroughly, and that the positive benefits both to the community and to offshore and onshore natural environments with respect to the potential impacts of anthropomorphic climate disruption and with respect to potential expenditures on alternative modes of renewable energy production result in a net positive outcome. I am glad that you are quite aware of the potential tradeoffs, that many questions remain and many answers need to be discovered with respect to all the variables implicit in this endeavor. As I indicated in my question/comment at the North Bend meeting, a significant concern of mine is how offshore wind will fit into a larger renewable energy strategy that utilizes a variety of technologies on a broader scale. Quite often development seems to occur in silos such that a comprehensive strategy is not pursued and resulting solutions are inefficient or work at cross purposes. It is my belief that the state, indeed the nation, should do the appropriate comprehensive modeling of current and expected future energy demand at the local, regional and national levels such that an optimal mix of technologies, including energy demand reduction, is developed to cost-effectively meet our complex energy needs. For example, with respect to residential and commercial building electrification, if the unit costs of centralized offshore wind production and distributed technologies are roughly equivalent or if floating offshore wind is costlier, and if the distributed technologies have less costly negative environmental impacts, it may make sense to defer to the distributed technologies. A consideration that ties into a just and equitable energy transition is that renewable energy production should fall more under public ownership and control and less under that of large profit-seeking private corporations. Public ownership and control can involve democratically accountable government at any level as well as ownership of decentralized supply technologies by individual consumers such as rooftop solar, community solar gardens, distributed residential/commercial wind generators, community wind farms, and other decentralized technological arrangements. I know that it may be too much to ask for fully socialized energy production, so in lieu of that I would like to see as much public ownership and control as is possible within the ideological confines of our society supplemented by strong	

Name	Comments	DLCD Response
	regulatory structures to hold private profit-seeking corporate ownership and control strictly accountable to the public and primarily oriented toward the benefit of energy consumers and their communities, and to the protection of environmental values. With that, I will continue to read the Roadmap and add comments as I feel are appropriate. Your efforts are much appreciated. Sincerely, Ken Bonetti	

Name	Comments	DLCD Response
Shawn Bergen	My name is [Shawn Bergen], and I am writing to respectfully submit my testimony in strong opposition to the placement of offshore wind turbines along the Oregon Coast. While I understand the intent to expand renewable energy, I have serious concerns that the true costs and consequences of offshore wind development are being underestimated—particularly when it comes to long-term maintenance, ecosystem disruption, and harm to wildlife. From what I have seen and researched, the cost to maintain offshore wind turbines can outweigh their productivity over time. These massive structures must operate in one of the harshest environments on earth—open ocean conditions—requiring constant monitoring, specialized vessels, and difficult, weather-dependent repairs. This reality raises legitimate concerns about whether these projects will deliver consistent, reliable energy at a reasonable long-term cost. Beyond economics, the environmental impacts are deeply troubling. Offshore wind development introduces persistent underwater noise, electromagnetic fields, and physical disruption of the seabed. These changes can interfere with migration, feeding, and communication patterns of marine species. The Oregon Coast is home to whales, fish populations, seabirds, and countless other species that depend on a stable and balanced ecosystem. The installation and operation of these turbines risk: - Disrupting marine mammal behavior, including whales and dolphins - Displacing fish populations and affecting commercial and recreational fisheries - Increasing collision risks and habitat loss for seabirds - Altering sensitive ocean habitats through anchoring, cabling, and construction These are not abstract risks—they represent real and potentially	Thank you for your comment. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future. Additionally, the Roadmap recommends a state-led siting process that may address the interests reflected in your comment. Several of the points in this comment relate to the overall economic lifecycle efficiency and cost of a project, which in turn may affect project profitability and energy costs to ratepayers. Points also raise concerns about project support infrastructure costs such as port upgrades and transmission, which may be borne by taxpayers as indirect costs. These concerns relate to other comments and suggestions for the Roadmap to recommend a requirement for detailed cost-benefit analysis and lifecycle financial disclosure prior to project approval and power procurement decisions. The topic of a larger renewable energy strategy was discussed at the May 2026 Offshore Wind Energy Roadmap Roundtable meeting, which is available to view online. The general consensus of the advisory group was in agreement with the idea that additional analysis is warranted to understand the relative benefits and tradeoffs between offshore wind energy and other forms of renewable energy, across a variety of factors, to inform whether and how the state invests in energy options. Additional language has been added to the recommended action in Section 6.2 (Achieve State Energy and Climate Policy Objectives) to emphasize the need for a coherent energy strategy through refinements to the Oregon Department of Energy's Oregon Energy Strategy, including

Name	Comments	DLCD Response
Shirley Williamson	irreversible harm to an ecosystem that coastal communities depend on for both livelihood and heritage. Additionally, there remain significant unanswered questions and documented challenges, including: High infrastructure and transmission costs Conflicts with fishing industries and coastal economies Limited long-term data on environmental impacts Project delays and uncertainty due to feasibility concerns Given these realities, it is difficult to justify moving forward with large-scale offshore wind development without far more comprehensive, long-term evaluation. The Oregon Coast is not an industrial zone—it is a vital natural resource that must be protected with caution and foresight. Once these structures are in place, the consequences may not be easily undone. For these reasons, I respectfully urge you and the Department to: Pause or reconsider offshore wind development plans Require extensive, transparent environmental impact studies Fully account for lifecycle costs, including maintenance and decommissioning Prioritize the protection of marine ecosystems, wildlife, and coastal communities We all want a responsible energy future—but it must not come at the expense of the very environments we are trying to protect. Thank you for your time and consideration.	additional cost/benefit analysis. Section 6.6.2 (Strategy: Identify Investment and Planning Needs) has also been significantly revised to underscore the conditions that are necessary for the state to justify investment in port upgrades and other support infrastructure for developing an offshore wind energy economic opportunity. Larger questions of project economic viability would be within the of a project developer to consider when deciding whether to move forward with a project proposal, but they are well-taken considerations for the state as well when deciding whether and how to invest resources in preparing for the potential of offshore wind energy development. The Roadmap recommends near-term actions for every potential pathway that DLCD believes could benefit state coastal management and prepare the state for multiple potential energy and coastal development futures. The environmental effects of concern described in this comment are represented in Table A-4 of Appendix A (Enforceable Policy Assessment) and were considered as part of the Enforceable Policy Assessment embedded within the Roadmap. Section 6.3 (Protect the Environment and Species (Marine, Terrestrial, Estuarine, Freshwater)) also discusses recommended measures the state can take to protect the environment and species as part of any future offshore wind energy decision-making process, and it is intended to address the types of environmental impact concerns included in this comment. Scientific understanding of offshore wind energy project effects on the environment is still developing and is being informed by existing fixed and floating installations around the world. The Roadmap recommends the development of an Oregon offshore wind energy science collaborative to be a venue where this growing scientific knowledge may be reviewed within an Oregon context and identify Oregon-specific information needs before the state should proceed with approval of a project permit. The Roadmap also recommends participation in a regional west coast science collaborative to work with neighboring west coast states on growing our knowledge of the potential effects to the California Current Large Marine Ecosystem and consider the potential cumulative effects of development. Together, these efforts are aimed at basing future state decisions on credible

Name	Comments	DLCD Response
		information and considering the potential effects of a project holistically, within a regional context. The Roadmap further recommends that if the state concurs with a project, that concurrence should be conditioned on clear enforceable adaptive management standards, with prescribed mitigation options should unexpected effects occur. Without this combination of information and management strategies, the state would have the option to reconsider or not approve a project under its federal consistency review authority.
John Duke	against the idea of ruining our coastline with these one mills.	Thank you for your comment.
Rene A.	My comment is to say absolutely NO to offshore wind projects. There are many more long-term drawbacks than benefits.	Thank you for your comment. One of the recommendations in the Roadmap includes a compressive cost-benefit evaluation of any proposed offshore wind energy project. This recommendation appears in Section 6.2 (Achieve State Energy and Climate Policy Objectives). The Roadmap also recommends cumulative impact assessment and substantial evaluation of the environmental and socioeconomic effects of a project as part of permit review, with an opportunity for the state to object to the project based on policies that protect the environment and communities (Section 6.3.2, Responsibly Manage Uncertainty and Risk strategy, and Section 6.5.2, Policies to Protect and Enforce Community Protection and Well-Being strategy). Together, the intent is to support decisions on offshore wind energy development that prioritize benefits and minimize drawback effects.
Marcia Isenberg	I oppose the development of an offshore wind energy industry. I believe Oregon should participate in the offshore wind industry through conducting research and possibly the manufacturing of parts and components needed by the industry. I do not think Oregon should host projects, whether short- or long-term.	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap. The Roadmap does not recommend whether offshore wind energy should be built off Oregon's coast. Instead, it outlines the conditions, processes, and standards from which it could proceed responsibly while protecting the interests of coastal communities, nine federally recognized Tribes in Oregon (Tribes), fisheries, and ecosystems while advancing Oregon's clean energy and climate goals.

Name	Comments	DLCD Response
Jan Halvorson	Hello Oregon Gov, I want to place my vote for the middle way with respect to developing offshore wind projects that will generate electricity, that is: please fund a pilot program complete with fabrication and implementation in the ocean. Evaluate its strengths and weaknesses and then scale appropriately. Thank you, Jan Halvorson - long time Oregon resident	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Gay Kramer-Dodd	Due to human impact on our environment leading to the climate catastrophe we are experiencing, I fully believe we need alternative forms of energy to move us off reliance on fossil fuels. My husband and I have supported wind energy through our local utility, Eugene Water and Electric Board, when we signed up to pay extra in support of wind power. My only real concerns about wind power are its effects on birds who may be killed by wind turbines, and other effects on the other creatures that could be effected. Siting off the Oregon coast should, in my opinion, be done in a way that will not impact migration paths of the Gray Whales, and minimize impact on other marine life. This all applies to construction of the sites as well. Since California has been moving ahead with such a project I would hope that Oregon will learn from them how best to do so in an environmentally sensitive way. Thank you for the opportunity to comment. Gay Kramer-Dodd	Thank you for your comment. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future. Additionally, the Roadmap recommends a state-led siting process that may address the interests reflected in your comment.
Trask Imholt	Hello, I am writing to impress my wishes to keep wind farms out of the ocean in the Oregon coast. There are so many downfalls for safety of the workers to cost of maintenance and environment impact for the foreseeable future. Not to mention the loss of one of the last truly wild places. Someday in the future people will come to Oregon to see the unblemished ocean if we can keep it presteen. I really hope the exuberant cost for the high maintenance operation will be enough to offset the feel good green movement pushing these bad ideas. Salt is hard on everything and these things will be a constant nightmare to keep running smoothly. Please help to keep our Oceans natural. Thank you, Trask Imholt	Thank you for your comment. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.

Name	Comments	DLCD Response
Janet Jolley	Dear Sirs, I'm sure you are aware that the voice of one equates to the voice of thousands ! Many do not take the time to write, believing that it doesn't matter. I believe it should. So, 'Listen Up' ! With deep concern over the proposed Offshore Wind Energy Development, I attended one of the DLCD community meetings. It was like being patted on the head and hearing, "Hush now...just go along with this energy development !" One short comment by the narrator said it all, ..."Offshore proposals may pass even if they're not wanted." Clearly this is another disastrous scheme being led by a greedy; self-serving; power hungry; totally ignorant group! Others, like this group, have thoughtlessly ruined much of the land, already, ...leaving devastation in their path. Now, these schemers want to conquer and devastate the oceans! Haven't we learned anything from ocean sonar blasting or underwater drilling? Is it ignorance or plain stupidity? It is our responsibility, our duty and obligation, as humans, to Protect and Preserve All the resources, we've been given, on this planet. This is not just serious...It is imperative. Oregon's coastline is a very important migration pathway. No scheming group of experimentalists should have any right to it. No one, No law, should allow it. The consequences would be devastating and lasting. There is land, previously harmed by human experiments and schemes, that can be used for these turbines. There are other ways, alternative solutions, to this quest for more energy. I can think of a couple and experts in the field of energy would be able to come up with many more solutions. Devastation to virgin waters isn't a solution. I cannot speak for you, but, I am sick and tired of the lies; of being patronized; of trying to be sold a bill-of-goods by self-serving schemers. When did our species begin to condone these things as being acceptable behavior? Clearly, there is a big difference between doing the 'right' thing and doing the 'wrong' thing that will lead to devastating consequences. THIS INTENDED PROJECT NEEDS TO STOP, NOW. Most Sincerely, Janet Jolley	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap. The Roadmap is not a vehicle by which the state will decide whether to pursue offshore wind energy or whether to approve or oppose any specific project. It is a planning and recommendation effort to identify standards, processes, and actions that can make the state better prepared for a range of futures that may or may not include hosting offshore wind energy turbines off the Oregon coast. The comment quoted from one of the public informational meetings is intended to mean that while the Roadmap presents multiple futures, and the state may take actions down a particular path, the offshore wind energy leasing and permitting process is initiated and led at the federal level. While the state cannot prevent the federal government or an interested developer from proposing to lease the Outer Continental Shelf for offshore wind energy exploration, we do have the opportunity to strengthen our policies and processes to give the state the best opportunity to influence the outcome. The comment also references values and concerns around protection of migratory species and preservation of the wild character of the ocean and its resources. These concerns were also reflected in the months of conversations that informed the Roadmap. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.

Name	Comments	DLCD Response
Yahoo Win	Save the whales and sea birds, and keep Oregon beaches free from toxic debris produced by broken and aging wind turbans. Not that toxic elements belong in the Columbia, however there are lots of better places to put bird killing wind turbans. We do not even know the effect on climate from harnessing energy from the wind. Has to do something, just like the claim of zero some economics. So no Wind power on or off the Oregon Coast. Born here citizen Redmond, Oregon	Thank you for your comment. Table A-4 in Appendix A describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.
Clayton Gillette	Since we have the technology to begin eliminating the stranglehold of the fossil fuel economy, please consider any alternative sources of energy production. I'm in favor of Oregon pursuing development of full-scale offshore wind energy production with public ownership. Clayton Gillette, Medford	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Kathy Hanavan	Hello, I am writing in support of at least a pilot project, if not a total buy in. We have to find ways to get more energy availability at a decent cost. Thank you! Kathy Hanavan, 97707	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Bart and Lynn King	Hello, This message will be as brief as my Subject line: We support Oregon in working to develop a full-scale offshore wind energy industry Sincerely, Lynn and Bart King, Silverton OR	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Dominique Alepin Johnson	Good morning, I am writing to express my strong SUPPORT for the development of offshore wind energy in Oregon. As the state considers the four paths outlined in the current roadmap, I urge officials to move forward with a plan that includes hosting and developing a full-scale offshore wind industry. Offshore wind is vital to Oregon's future. To meet our climate goals and ensure long-term energy security, we need to harness as much clean energy as we can possibly muster. The potential to power over one million homes from the sites off Coos Bay and Brookings is an opportunity we cannot afford to waste. While I recognize the complexities involved with coastal stakeholders and federal policy shifts, we should not be foreclosing these	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
	possibilities. Choosing a path of "no offshore wind" would be a step backward for our state's economy and our environmental leadership. We should be following the example of our neighbors in California and finding a proactive path forward that allows Oregon to remain an energy leader rather than an observer. Thank you for extending the comment period and for considering the importance of this resource to Oregon's future energy grid. Dominique Johnson	
Mollie	No wind farms off the Oregon coast. PERIOD. NONE. NO WIND FARMS. AND JUST TO REITERATE - NO WIND FARMS OFF OREGONS COAST. Thanks, Lifelong Oregonian.	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Richard Alleger	Please, do not let fear of current federal administration slow Oregon down. Of the four points noted, I favor: • Oregon hosts a pilot offshore wind energy project to gain more experience before decisions to expand into a full-scale industry. A review of this nearly 25 year old document shows just how far ahead of even the world....and Texas....Oregon was, at one time: https://www.commerce.senate.gov/wp-content/uploads/media/doc/McArthurTestimony.doc The state of Oregon needs to GET BACK IN SADDLE and get started again. Wind energy is the future....do not refrain from realizing this. Oregon leads the way in many areas....we can do this too. Will new methods to extract more oils and fossil fuels become available? Of course. Will any slow or stop the damage caused? No. Let's GO! Richard Alleger, Bend, OR.	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
Evan Raskin National Campaign Manager EARTHDAY.ORG	To whom it may concern, On behalf of EARTHDAY.ORG, I submit this public comment regarding the Offshore Wind Energy Roadmap currently under review. The extension of the public comment period underscores the significance of this decision. Oregon is not only determining whether offshore wind development will move forward, but whether it will exercise leadership in shaping a clean, resilient energy future grounded in public input and scientific integrity to meet a moment defined by the urgent need to transition to affordable, non-polluting energy systems. The theme of Earth Day 2026, “Our Power, Our Planet,” reflects a fundamental truth: the systems that shape our lives are built through collective action and can be reshaped to serve the public good. Offshore wind represents one such opportunity. It is a scalable source of clean energy that can reduce emissions, stabilize long-term energy costs, and contribute to regional economic development. It is a fiscally responsible choice, with greater affordability and greater job opportunities than fossil fuels. A viable path forward is not defined by whether offshore wind is pursued, but by how it is pursued. Oregon has the opportunity to set a national standard by demonstrating that clean energy deployment can coexist with environmental stewardship, cultural respect, and economic fairness. This requires: • A commitment to implementing energy choices that best serve the economic needs of community members, who will pay lower energy bills and have more jobs available when wind energy is prioritized. • Transparent permitting and engagement processes accessible to the public • Early and ongoing consultation with Tribal Nations and coastal communities • Clear mitigation strategies for impacts on marine ecosystems and fisheries • Workforce development pathways that deliver local economic benefits The absence of development would not eliminate the pressures facing Oregon’s energy system, or the climate risks confronting its communities. It would defer them. The question is whether Oregon will	Thank you for your comment. DLCD agrees that how a path is pursued is a critical question to resolve, and the Roadmap attempts to describe multiple potential future paths that adhere to core objectives and guiding principles. The Roadmap recommends measures such as -- additional economic cost-benefit analysis of offshore wind energy versus other alternatives; -- accessible permitting processes incorporating meaningful engagement and science collaboration; -- early and ongoing consultation with Tribes and coastal communities, including exploring a more formal role in the process through community agreements and Tribal mitigation agreements; -- recommending policy amendments to clarify and further detail adaptive management and mitigation expectations, as well as recommendations for how these policies should be implemented through the state's federal consistency review authority to provide an ongoing enforceable mechanism for involvement; -- recommendations for early workforce development planning and economic opportunity coordination on a regional level. It is DLCD's hope that these and other measures recommended in the Roadmap will achieve the vision of responsible offshore wind energy development described in the comment, if it should materialize in the future.

Name	Comments	DLCD Response
	lead in shaping solutions or remain vulnerable to worsening conditions. Our Power lies in collective participation. Our Planet depends on decisions that reflect long-term responsibility over short-term hesitation. We urge the Department to finalize a roadmap that enables responsible offshore wind development while embedding strong safeguards for communities, ecosystems, and cultural resources. Sincerely, Evan Raskin National Campaign Manager EARTHDAY.ORG	
Bruce Sullivan (1)	Hello, Off shore wind energy is a key element of a broader sustainable energy industry. The high intensity and consistency of offshore winds make it an excellent compliment to other clean renewable energy sources. This resource is an essential part of a well-rounded, affordable energy resource for Oregon. Offshore wind can be an important source of high-paying jobs in Coos and Curry counties. Beyond direct employment, wind operations will bring much needed economic activity to the area. Tax and lease revenues will support much needed local services. Offshore wind is far more affordable than fossil and nuclear energy. It can be one way to supply affordable energy for the future. While construction can be disruptive to the marine ecosystem, measures can be taken to minimize construction impact. Once completed, structures below the water's surface can be beneficial to marine species as they form an artificial reef. Bird strikes are inevitable, but the harm to birds from wind turbines is far lower than other risks including climate change and pet cats. The fishing industry will be affected. These impacts can be minimized through robust public involvement and cooperation with local fishing groups. Careful site selection and operation can address the vast majority of issues. Since the proposed sites are 30 miles offshore, they will not be visible from the Oregon coast and will not affect tourism. Modern life requires electricity in ever growing amounts. No energy source is completely benign, including renewables. However, the total economic and environmental impact of renewable energy including	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
	offshore wind is by far lower than traditional sources. Oregon should push ahead with plans for a robust offshore wind industry. Thank you for your consideration. Bruce Sullivan, Oregonian since 1982	
Sue Mandeville	I think coastal wind energy is a great thing. If a project gets the go ahead, do not let Bonneville Power run the project or have anything to do with to do with it. Make it a new public non-profit utility. This is very important. I think many more people would go for it with this type of setup. Don't forget about Wave Energy Generation. And Oregon is perfect for geothermal. Thanks, Sue Mandeville, Springfield, OR	Thank you for your comment Regarding the concept of public ownership of an offshore wind energy project, the Roadmap does not constrain or recommend who may act as the developer of a project. Under current laws, a public organization such as a community energy group or an existing Public Utility District could theoretically pursue offshore wind energy or purchase a constructed project from the original developer, though the high capital costs and scale of projects may present barriers to full ownership. Public groups may also elect to purchase power produced from a project through a Power Purchase Agreement. While DLCD recognizes the comments made in support of public ownership options, no specific recommended standards or actions have been identified for inclusion in the Roadmap to constrain or promote certain types of project owners over others. It remains true that the Bonneville Power Administration is the owner of most of the large capacity transmission infrastructure connecting the Oregon Coast to the regional electricity grid. An offshore wind energy project located off the coast of Oregon would likely still need to work within the policies and technical capabilities of the BPA system. The creation of a state-owned or private competitor to the BPA transmission system would be a substantial undertaking and is beyond the scope of the offshore wind energy roadmap.
Chris and Deb Hiatt	Greetings, I hope this message finds you well. I am writing to express my earnest support for the advancement of wind energy along the Oregon coast. This region possesses remarkable potential for harnessing clean, renewable energy, and I firmly believe that the expansion of wind energy initiatives will yield enduring benefits for both the environment and our local communities. Wind energy not only diminishes our dependence on fossil fuels, but it also fosters sustainable economic growth through job creation and technological innovation. The unique wind patterns present along the	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
	Oregon coast further underscore its suitability as a leader in renewable energy production. I urge all stakeholders involved in these endeavors to persist in advocating for and investing in wind energy projects. Such efforts will contribute significantly to securing a brighter, greener future for generations to come. Thank you for your attention to this matter.	
Holly M	Hello, I grew up for a big part of my life in Palm Springs. On the way there, if you've ever been, you would have seen a field of windmills, I always thought it was cool that we could generate energy that way. And in that section of desert, it didn't seem like it was disturbing anything. With the amount of destruction, we are causing to the sea with our drilling and our ships, and trash, I disagree with the notion that installing windmills in there is a good idea. Predominantly, I'm concerned about the environment and the sea life. They seem like obstacles for whales and can't possibly be good for the seabed. The installation would be destructive. Alternative energy is the future, but it should be thought through and strategically laid out considering all the important factors. The top priority should be a solution that causes the least environmental impact. We already have many rooftops where things like this can be installed, and solar. Please utilize the infrastructure already in place and these terrific replenishable resources intelligently. Holly	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.

Name	Comments	DLCD Response
Brian Moore	Dear Mr. Burright: As a resident of North Bend, OR, I support exploring offshore wind as part of our long-term energy strategy. However, I encourage the state to adopt a measured, evidence-based approach to development. We do not need to invent a new model from scratch. The United Kingdom and Scotland have already demonstrated a thoughtful path forward beginning with small-scale pilot projects, closely studying real-world impacts, and then scaling responsibly based on what is learned. This approach has allowed them to better understand effects on marine ecosystems, bird populations, fisheries, visual impacts, and the durability and safety of offshore operations before committing to large-scale deployment. Oregon faces many of the same uncertainties: impacts on coastal communities, tourism, fisheries, navigation, environmental systems, and worker safety in harsh ocean conditions. A pilot-first strategy would allow us to answer these questions with real data rather than assumptions. Just as importantly, this approach builds public trust. By demonstrating results transparently and adjusting course as needed, the state can develop offshore wind in a way that earns broad, lasting support rather than resistance. Our coastal communities need economic development that can provide family-wage jobs. We need time to demonstrate that wind energy won't destroy livelihoods but offer a new generation of workers good jobs that can integrate with those in existing industries on the coast. I encourage Oregon to move forward, not by rushing to full-scale development, but by taking a disciplined, phased approach: start small, learn, and scale wisely. This is how we can pursue innovation while protecting the values and resources that make our coast unique. Sincerely, Brian Moore	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
B. Kim	Let California go it's own way. Oregon should quit looking to California as a reliable leader. Trump is right to re-evaluate wind energy. I wonder if the article had framed it as his "war on wind" to tap into the anti-Trump sentiment of the anti-Trump Oregonians, hoping they'd vote in favor of it only	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were

Name	Comments	DLCD Response
	because Trump seems to be against it? In any case, the negative impacts outweigh any hoped-for energy gains. There are negative impacts to marine life, birds and other flyers. It seems like wind energy supporters 'hope' there's no bad impact to the environment; the costs to repair or mitigate any resultant harm could wipe out much of the energy savings that were 'hoped for.' Infrastructure costs and maintenance are always underestimated. Any coastline in sight of the wind turbines will suffer in tourist and property value declines. I for one would no longer find relaxation or reconnection to nature in visiting the beach if confronted with "technology" fouling up the view of the ocean. Some people can hear the thrumming of the equipment. What is the potential health impact on people? NO to offshore wind energy. <i>[image here removed, refer to original email]</i> --B.Kim, Gresham	evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.
Sue Craig	Offshore wind projects should not go forward. We have a two thousand foot dropoff along our Oregon coast. This means that the turbines would have to be huge, would be "anchored" to really impossible depths, that would interfere with whales, fish runs, etc. Not good. It would also mean we would have to have ships and conduits that don't even exist at the moment. they should be very expensive as would ALL aspects of this idea. None of this would be feasible for cheap power. We need to push for solar and for wind in other places. Thank you. Sue Craig, Eugene	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
Mequela Moreno ECONCRETE	<i>Please refer to the two documents (5 pg. PDF and image of table) included with this comment.</i> Dear Oregon Offshore Wind Planning Team, Thank you for the opportunity to comment on Oregon’s offshore wind development. To support the state’s energy and environmental objectives, we recommend incorporating bio-enhanced concrete into foundational elements like scour and cable protection. Recognized in federal projects like Sunrise Wind [<i>hyperlink included</i>], this technology improves biodiversity and marine habitat formation without altering standard construction methods. Integrating these materials into pilot-scale deployments would allow Oregon to test innovative solutions that reduce long-term environmental impacts and establish sustainable best practices. We would welcome the opportunity to share lessons learned from existing deployments and discuss how this technology can support Oregon’s framework. Sincerely, Mequela Moreno	Thank you for your comment. The Roadmap does not recommend specific technologies or materials for use in offshore wind energy projects, focusing instead on standards, actions, and processes the state should use in future offshore wind energy decision-making. If a project were to be proposed and reviewed by the state in the future, the project's environmental effects would be evaluated against enforceable policies. Aspects of project design and material selection may be considered at that time, including mitigation options to minimize effects or improve ecological outcomes, which may include alternative materials.
Linda Kelley	I would like to go on the record as strongly supporting offshore wind development. We must move away from fossil fuels as a source of energy. Local renewable energy is not only good for our environment and a necessary choice to mitigate our changing climate; it is also one of the strongest tools we have to prevent wars on the Middle East largely revolving around oil.... Decentralized renewable energy is an important democratic choice and one that will protect our world into the future. Linda Kelley, Eugene, OR	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
Albert Geiser (2) via postal mail	<i>Please refer to the 1-page letter dated April 2, 2026, received April 7, 2026, and stated here.</i> Potential Gap, Emergency Planning, Kulluk, a name to remember! This is a cautionary tale of a giant drilling platform with a superstructure standing 253 feet above the waterline, presenting a huge sail area. This unpowered “buoy” was designed to be anchored with twelve anchors in depths of up to 400 meters. While under tow from Unalaska to Seattle by the 360 ft anchor handling tug Aivig (Aiviq, which is now US Coast Guard Cutter Storis) with a bollard pull of 208 tons. Approximately ten days into the voyage, the tow connection failed roughly 50 miles from Kodiak Island. The Kulluk eventually drifted ashore on Sitkalidak Island on December 31, 2012. This occurred after three other tugboats and the Coast Guard Cutter Alex Haley attempted to tow the Kulluk to a safe anchorage. The winds and sea state at the time were equivalent to those not uncommonly found in the Pacific Northwest along the continental shelf. The proposed wind generator turbine blades will reach 750 ft and, depending on the final design, weigh between 2 and 8 thousand tons (one thousand tons equals 2 million pounds) and will require several towing and anchor handling vessels to place the projected 1,600 turbines in California waters and hundreds more offshore in Oregon waters. This proposal has not been tested in the depths of the eastern Pacific shelf, and, if implemented, could lead to two likely disaster scenarios. First, one of the towers drags its anchor into another, breaking all anchor points. Second, a disabled cargo ship drifts through the picket line of towers and collides with one, setting it adrift. This tale of a single “buoy” breaking loose, with five capable tow vessels on scene and unable to prevent the grounding, offers great insight and raises many more questions. Respectfully, Albert Geiser, Port Orford References: NTSB Accident # DCA13NMO12, The New York Times Magazine “The Wreck of the Kullu, Wikipedia	

Name	Comments	DLCD Response
Judith and Joe Huck	Hello, As long time Oregon residents, we encourage you to move forward with the offshore wind energy project. We need additional options for clean energy. We would like to see a full-scale offshore wind energy field of wind turbines. California can lead the way. Oregon can learn from California's experience. Keep moving forward. Let's do this! Sincerely, Judith and Joe Huck, Astoria, OR	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
James Hunt	Hello, After reading the material available, I am voicing my opposition to this project. James Hunt, Florence	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Richard Wisner	Dear Mr. Jeff Burright and others at Oregon Department of Land Conservation and Development involved with this offshore wind idea: Here is my two-cents worth regarding the Oregon Offshore Wind Energy Roadmap. I've decided to write after reading another recent article on the project on Lincoln Chronicle.* I've simply copy & pasted a quote from the article then added my thoughts following. The quotes are in italics with my comment next in plain text. I hope this helps in your decision making processes. I write from my experience as a 75+ year Oregon coast resident with 57 years of going to sea under my belt aboard a wide variety of vessels working all over the world's oceans. <i>"The roadmap is part of a multi-year effort by state and federal officials and private companies to harness the power of ocean winds off the Oregon Coast to generate clean electricity."</i> Please remember those so-called "ocean winds" become "land winds" as soon as they reach the coast where they are just as accessible but without the additional and very significant costs of maintaining a floating platform at sea, particularly for any length of time. Think "maintenance". Please recall the time proven definition of a "boat" - a hole in the water you throw money into. (A floating platform is by	Thank you for your comment. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including winter storm survivability and potential effects to state coastal areas resulting from turbine or mooring equipment failures and associated parts landing on beaches or sinking to result in species or habitat consequences . These are serious and significant concerns. During any offshore wind energy project permit review, the state would consider potential risks and hazards related to wind and sea states and require credible information to support a decision whether an offshore project is of sufficient design to be consistent with state policies that protect seafloor habitats and Oregon shores. The Roadmap also recommends that emergency management plans and clear emergency procedures be included with any decision to move forward with a project.

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	definition a 'vessel', otherwise known as a boat.) <i>"The Coos Bay site is 30 miles from the coast, and the Brookings area is 20 miles away."</i> Anyone familiar with Oregon coast weather at sea is also familiar with the area around Cape Blanco which lies between the two chosen most likely sites. When many local area fishermen hear Cape Blanco the first word that pops into their brain is most likely wind – and its accompanying weather. During the Columbus Day storm, winds at Cape Blanco exceeded 145 mph. True, an outlier, but it does from time to time get plenty rough out there. <i>"People generally, I think, all feel a connection to it. No matter where they live, people will visit the ocean, have some sense of connection and ownership over what it means to them."</i> I agree. That's fine. But it has been my experience that land-lubbers have some very romantic ideas about what it means to go to sea. <i>"While Oregon decides on its ocean wind future, California is moving forward with its offshore projects,..."</i> Well yes, they do seem to jump in before testing the water depth often enough. For quite some time now, decades it seems, we have been following dutifully behind our neighbors to the south on many, many bright ideas. So long in fact that we could rightly say that the former "Oregon Way" is merely the "California Way" in disguise. It's far past time we stop using them as an example and especially as a model to emulate. Even though they like to refer to Point Conception as the Cape Horn of the West Coast, there is no comparison between weather found in the Santa Barbara Channel and what you'd find off Cape Blanco. Any way, I don't want to turn this into a long diatribe. But please consider shelving the idea until we are in a better position to try things like offshore wind generation. I suggest Oregon Department of Land Conservation and Development go for the 1st. option of the four mentioned in the article, "No offshore wind energy." There is no rush. The way I see the overall energy production picture is that small modular reactors do have a place in supplying our energy needs and are much more practical – on paper, where offshore wind energy production also resides. Thank you, Richard Wisner, Lincoln County	

Name	Comments	DLCD Response
	* https://lincolntonchronicle.org/public-comment-extended-on-future-of-offshore-wind-projects-in-oregon-including-none-at-all/	
Gary Rhinehart	I am in favor of the offshore energy project. At 20 miles off shore, 99% of Oregonians will never see them. My only concern would be any Problems for migrating whales? I have lived in Oregon since 1962, and think we need to look to the future at energy sources? Gary Rhinehart, WHITE CITY, OR	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.
Laura Russell	Yes! Great idea! Oregon develops a full-scale offshore wind energy industry. Laura M. Russell	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
James Russell	Yes. Oregon develops a full-scale offshore wind energy industry.	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Eugene Robbins	Anyone who's against offshore wind energy is not serious about slowing climate change. People who have studied this say that only by utilizing offshore wind, solar, geothermal, hydro and even nuclear can we make any progress in slowing climate change. I support offshore wind turbines for Oregon...their negatives are far outweighed by their positives! Eugene Robbins, Ashland, OR 97520	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Suzanne Lavine	I would like to see Oregon participate in pilot programs for Offshore Wind projects. To fully understand the costs, benefits, and negative impacts. If pilot not feasible, I would like to see Oregon participate in small scale projects and build on those with what is learned. Suzanne <i>My friends, love is better than anger. Hope is better than fear. Optimism is better than despair. So let us be loving, hopeful and optimistic. And we'll change the world. - Jack Layton</i>	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
Becky Snow	I favor a pilot project to try it out and learn more about what would be entailed and what gained, while also paying attention to California's experience and learnings. Becky Snow, Ashland, OR	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
John Chaplin Metric Motorworks Inc.	I'm not even going to start on the environmental aspects of this boondoggle. A person would have to be a damned fool to not understand the simple math of this nonsense. No matter how much we pollute the ocean with this green pipedream not enough energy will ever be generated to make two pinches of salt difference or begin to pay back all the monetary costs not including to the ocean environment. This is pure fantasy and to invest in it is a fool's errand of the Nth degree. Probably the only winner will be China building and selling us the components. I would urge you to stop this foolishness immediately forever. These wind turbines are a loser from the word go and always have been. It's really disheartening that otherly intelligent humans would entertain this at all after even a cursory glance at it. The math never lies. Thank you, John Chaplin Metric Motorworks Inc. Coos Bay, OR	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Rae Brown-Sluter	There is one reason only for the State of Oregon to back building offshore wind projects: Climate change. If we do not encourage green energy in every form, especially along our coasts, we are losing the race to save our planet. This chosen war by our current federal administration is the best example of why we should not be relying on oil and instead should be using every available green source to supply our energy needs. Sincerely, Rae Brown-Sluter	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
Donna Bleiler	I am against any plan to construct turbine ocean farms off the coast of Oregon. Offshore wind farms can disrupt echolocation and acoustic systems for marine life, particularly during construction, due to intense underwater noise from pile driving and survey sonar. Whales and other marine mammals that rely on sound for navigation and hunting may experience temporary hearing loss, behavioral changes, or avoidance of the area. Studies suggest operational noise disrupts behaviors over distances of several hundred meters to kilometers for species like herring and cod. Sound propagation in water is efficient and travels five times faster than in air, meaning underwater noise can affect a wide area. The impact on fishing, crabbing and shrimping industries is reason enough to not move forward. The damage to birds and seagulls should also negate any plan for turbine wind farms. Oregon has no need for ocean turbines when other more cost effective methods are readily available, but for the policies based on the lies of climate change. That doesn't justify ruining Oregon industries and wild birds. Donna Bleiler	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.
Thena Larteri Lyons (5)	New Policies should address: 1) Other Climate Scientists that offer opposing views. 2) The amount of "immediate" financial energy savings for all Oregonians. -Thena Larteri Lyons	Thank you for your comment. The recommended action in Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) related to the creation of an Oregon offshore wind energy science collaborative has been revised to recommend inclusion of a range of scientific perspectives, including opposing views. A new action has also been added to Section 6.2.3.4 (Action: Require Financial Transparency and Lifecycle Cost Disclosure prior to project procurement approval) to recommend requiring financial transparency and lifecycle cost disclosure prior to power procurement approval, which includes anticipated impacts on electricity rates.
Sandra Ecke	Subject: I WOULD LIKE TO Comment on the Wind Energy Roadmap Sandra Ecke	

Name	Comments	DLCD Response
Janet Johnson	I totally oppose any offshore wind schemes. Turbine blades and noise are harmful to birds. Turbines are harmful to marine wildlife habitat. Turbines cost more to manufacture than their supposed energy output. Energy is wasted via cables transporting long distances. Wind power is unreliable because it can only work when wind conditions are optimal. Aesthetic views of the scenic Oregon coast promote tourism, and wind farms promote the opposite. I am an environmentalist who used to believe the lies of climate change and the need for green energy. Green energy is a gift. Do not destroy marine habitat and aesthetic views with wind farms. Janet E. Johnson, Newport, Oregon	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.
Dean and Annie Prosser (1)	We are absolutely in favor of wind energy off the OR coast. We need sustainable energy. The wind always blows here. Surely, a compromise can be found with the fisherman and crabbers. Some wind turbines float (check out Europe) and the seabed anchors for others attract fish and other aquatic life colonies. Please help OR get closer to sustainable energy. Annie & Dean Prosser p.s. We lived for many years with our own windmill for electricity - it works !	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Dean Apostol Roundtable member Oregon Chapter, American Society of Landscape Architects	<i>Please see the 3-page letter dated March 9, 2026 by Greg Matto, President of Oregon Chapter of ASLA.</i> Hello Jeff. On behalf of myself and the Oregon Chapter of the American Society of Landscape Architects, please accept this letter with recommendations as we round the final bend of the Offshore Wind Roadmap process. Let us know if you have any questions. Dean Apostol, Roadmap Committee Member	Thank you for your comment. A response to the attached letter is included separately.
Ross Tyler (1) Offshore Renewable Energy International LLC	<i>Please see the 5-page letter dated April 17, 2026 by Ross Tyler of Offshore Renewable Energy International LLC</i>	Thank you for your comment. A response to the attached letter is included separately.

Name	Comments	DLCD Response
Lucy Lefkowitz National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, Surfrider Foundation, and American Bird Conservancy	<i>Please see the 30-page letter dated April 17, 2026 by Lucy Lefkowitz, on behalf of the National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, Surfrider Foundation, and American Bird Conservancy.</i> Good afternoon, Please accept the following comments on the draft Oregon Offshore Wind Energy Roadmap, submitted on behalf of the National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, Surfrider Foundation, and American Bird Conservancy. Thank you. Lucy	Thank you for your comment. A response to the attached letter is included separately.
Rick Eichstaedt CTCLUSI	<i>Please see the 4-page letter dated April 17, 2026 by Teresa Spangler, the Chair of The Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians.</i>	Thank you for your comment. A response to the attached letter is included separately.
Lucy Lefkowitz National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, and SOCAN	<i>Please see the 25-page letter dated April 17, 2026 by Lucy Lefkowitz, on behalf of the National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, and SOCAN.</i> Good evening, Please accept the following comments on the draft Oregon Offshore Wind Energy Roadmap, submitted on behalf of the National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, and SOCAN. Thank you. Lucy	Thank you for your comment. A response to the attached letter is included separately.
Fred Holzmer	Hello - I support the following alternative for offshore wind energy in Oregon: • Oregon hosts a pilot offshore wind energy project to gain more experience before decisions to expand into a full-scale industry. Thank you, Fred Holzmer, Newport, Oregon	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
Dean and Annie Prosser (2)	Hello, Offshore wind energy would be a huge benefit for Oregon. From recent events, it is clearer than ever that renewable, year round electricity generation is more important than ever. As energy demand is spiraling upward, so must generation. Oregon's hydro power is excellent but unlikely to increase to meet the demand. Installing new fossil fuel generation facilities should not even be considered. Floating off shore wind offers excellent potential benefits with very little downside. Undersea anchor assemblies do not deter fish and wildlife. On the contrary, other countries have noted an increase in sea life activity around these structures. Surely fisherman and native stakeholders could be shown results of other countries who have long track records producing substantial power without adverse environmental affects. This is a very important opportunity for Oregon. What a shame it would be to have this potential eliminated simply because some stakeholders have not yet learned the facts. Dean Prosser	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Judi Irving	To Whom it may concern: The best option for Oregon with respect to climate change, jobs and vision is for Oregon to develop a full-scale offshore wind energy industry. This state always seems to take the wait and see approach which has not served it well. Sincerely, Judi Irving, Seal Rock, OR	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Allison Ford McKenzie	Hi. I know the DLCD is getting all kinds of feedback about the Offshore Wind Energy Roadmap, but of all the options available involving wave energy it seems to make the most sense to EXPERIMENT before committing to any long-term project or limiting research capabilities and investments. I recognize the concerns from the fishing community, tribes and others worried about impacts on our marine ecosystem. I share those concerns, and I am surely one who does not want to see a bunch of windmills when I look at the ocean either, ever. But it would be most helpful if our decisions were made based on research FACTS rather than FEELINGS, and to determine the impacts of oceanic wave energy, both positive and negative, before any decisions w/ long-term	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
	consequences are considered. We already have the new research facility and competent people to run a pilot project. Assuming funding is available, why not invest in a trial/pilot project to see what is possible and keep stakeholders informed and involved in the process? There will no doubt be results we expect and others we don't, perhaps even some benefits that have not been anticipated, but how will we know unless we actually EXPERIMENT to see what this new energy resource might provide? With facts in hand, we can then make decisions about what would be best for Oregon and explore some of the other potential paths proposed based on FINDINGS. Emotions are already running high with the mayhem unleashed in the Middle East, but that also points once again with a big red arrow toward a need for energy sources that do not rely on fossil fuels. A carefully planned pilot project could be a first step toward getting new answers or crossing options off our list. Allison Ford McKenzie, Newport, OR	
Gillian Holbrook	To whom it may concern: Oregon's best direction is toward economic, environmental, and energy sustainability. Please make development of the full-scale offshore wind energy industry the roadmap for Oregon's future. Thank you, Gillian Holbrook, Rockaway Beach, OR	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Carly Baker	I am SO glad this has not happened yet because we are learning that windmills are NOT good in the long run. Windmills are ugly, they disrupt wildlife (especially marine animals), they take a tremendous amount of energy to manufacture and when they break down they do not decompose, filling up our landfills. Also they kill a tremendous amount of birds. I do not support wind mills whatsoever in Oregon especially not on or near water including the ocean. They are an ugly sight already all over the Columbia Gorge. Carly Baker, Keizer, OR	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Doug Heiken Oregon Wild	<i>Please see the 16-page letter dated April 21, 2026 by Doug Heiken on behalf of Oregon Wild</i> Please find attached comments from Oregon Wild on the draft Offshore Wind Roadmap	Thank you for your comment. A response to the attached letter is included separately.

Name	Comments	DLCD Response
Jena Carter (1) Roundtable member The Nature Conservancy	Hi Jeff – Thank you for your hard work, presentations, and outreach to the public this week. You have a lot on your plate and you’re carrying it with grace. As I was going through the Roadmap, I noticed some minor items in the report. None rise to the level of being included in our formal comment letter but I’m sharing in case its helpful to you. Cheers – Jena Minor Comments and Edits • Acknowledgements: The environmental NGOs and climate groups are singled out as “advocates,” but others are listed as entities or persons. Perhaps change the name to conservation organizations instead of advocates? • Table ES-1 has double spaces and an odd mark in the Workforce section. It is also unclear if this is a summary of all of the recommendations or just the ones that fill gaps? • The Exec Summary loses its page numbers after page 7. • Section 1.2. This sentence could be reworded for clarity: During the Roadmap development process, HB 3963 was enacted in the 2025 legislative session. This bill provided additional time to better engage coastal communities, and coordinate with the Oregon Energy Strategy developed by the Oregon Department of Energy (November 2025). • Section 2.1. The first three paragraphs bounce between different months and years and sometimes moves backward in time. For example, the order of this sentence could be rewritten to make the timeline sequential: “By September 2024, the federal government had approved more than 15 GW of projects for construction, with 4,097 MW under construction by October 2024.” • Section 2.2, on page 9, this sentence is out of place and could be deleted. “According to HB 4080, DLCD began development of the Offshore Wind Energy Roadmap in September 2024.” • Section 2.3.1. Appreciate that the reference to House Bill 3630 (2023) includes the year that the legislation was enacted. For consistency, you may want to add the year to other bills that are mentioned in the Roadmap. • Section 2.3.2. You may wish to reference that this study is a result of House Bill 3375 (2021). • Section 2.3.5. Spell out the NROC acronym	Thank you for your comment. The recommended edits and corrections have been applied in the revised Roadmap.

Name	Comments	DLCD Response
	- Appendix A on page 2, the last sentence of text is missing a period. Additionally, in section 3.1.2, the term “Clear Signals” should not have a capital S. - Appendix Table B.2 contains redundancy with some Tribes and agencies being listed more than once.	
Bruce Sullivan (2)	Hello, Off shore wind energy is a key element of a broader sustainable energy industry. The high intensity and consistency of offshore winds make it an excellent compliment to other clean renewable energy sources. This resource is an essential part of a well-rounded, affordable energy resource for Oregon. Offshore wind can be an important source of high-paying jobs in Coos and Curry counties. Beyond direct employment, wind operations will bring much needed economic activity to the area. Tax and lease revenues will support much needed local services. Offshore wind is far more affordable than fossil and nuclear energy. It can be one way to supply affordable energy for the future. While construction can be disruptive to the marine ecosystem, measures can be taken to minimize construction impact. Once completed, structures below the water’s surface can be beneficial to marine species as they form an artificial reef. Bird strikes are inevitable, but the harm to birds from wind turbines is far lower than other risks including climate change and pet cats. The fishing industry will be affected. These impacts can be minimized through robust public involvement and cooperation with local fishing groups. Careful site selection and operation can address the vast majority of issues. Since the proposed sites are 30 miles offshore, they will not be visible from the Oregon coast and will not affect tourism. Modern life requires electricity in ever growing amounts. No energy source is completely benign, including renewables. However, the total economic and environmental impact of renewable energy including offshore wind is by far lower than traditional sources. Oregon should push ahead with plans for a robust offshore wind industry. Thank you for your consideration. Bruce Sullivan, Oregonian since 1982	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap. The specific recommendations related to site selection and mitigation measures are well-taken and resemble recommended actions in the Roadmap. While the points about the relative harm of an offshore wind energy project compared to climate change or other stressors bring perspective to decision-making, if the state reviews a proposed project in the future, the review will be based on state protective standards that apply to the individual and cumulative impacts of the project itself, rather than its relative effect. Renewable energy sources may help the state address its share of responsibility to reduce the contributing factors of climate change; those projects themselves do not reduce or eliminate the effects of global climate change on the uses and resources of Oregon's coastal zone. Rather, an offshore energy project would introduce new effects that themselves would need to be found consistent with Oregon policies.

Name	Comments	DLCD Response
Ross Tyler (2) Offshore Renewable Energy International LLC	<i>Please see the 5-page letter dated April 17, 2026 by Ross Tyler on behalf of Oregon Renewable Energy International LLC. This may be a duplicate to the one submitted previously.</i>	Thank you for your comment. A response to the attached letter is included separately.
Randy Harrison	Dear Oregon Department of Land Conservation and Development (DLCD), Please highlight the impacts of climate change and the importance of Oregon meeting its clean energy and decarbonization goals. The roadmap should consider in its recommendation for all potential pathways that the state promote a community-centric approach to responsible energy development such as ensuring Tribal consultation, resources for local governments and scientific research, promoting supply-chain opportunities, and ensuring community benefits that includes union jobs, apprenticeship opportunities, and career pathways for Oregonians. Sincerely, Randy Harrison	Thank you for your comment. Additional language has been included in the Roadmap to emphasize the importance of Oregon meeting its clean energy and climate goals. The recommended policies and actions in the Roadmap include community-centric aspects similar to those described in this comment, such as Tribal consultation, increasing capacity for local governments and scientific collaboration/research, promoting supply-chain coordination and opportunities, and establishing policies and processes to support the creation of community agreements as part of the decision process.
Christopher Hall (3) Water League	<i>Please refer to the 123-page letter dated April 22, 2026 by Christopher Hall on behalf of Water League.</i> (link to comment: https://www.oregon.gov/lcd/OCMP/Documents/Water-League-Public-Comment_OSWRoadmap_042226.pdf) Dear Jeff and Sadie, Please see attached to this email Water League's written public comments regarding the Offshore Wind Energy Roadmap. We appreciate the opportunity to participate in the public process by providing these comments. You can also find our comments at this link here. Please confirm receipt of this email and the file attachment. Thank you, Christopher Hall, Executive Director, Water League, Cave Junction, OR	Thank you for your comment. A response to the attached letter is included separately.
Ashley Ryan	Nobody wants your “clean” energy off the Oregon coast we have been very vocal throughout the years that we do not want missing you guys keep pushing it. Please stop we love our scenery. We love our ocean, our animals & mammals in the ocean, and we love our fisherman. Quit ruining everything with the clean energy nonsense. It	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were

Name	Comments	DLCD Response
	ruins the Earth, you funnel money, and we're tired of being taxed for dumb stuff. You can make this public comment. I don't care. Stop with the nonsense and leave our nature alone!!!! Ashley Ryan	evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.
Heidi Hartman	Dear Oregon Department of Land Conservation and Development (DLCD), Please highlight the impacts of climate change and the importance of Oregon meeting its clean energy and decarbonization goals. The roadmap should consider in its recommendation for all potential pathways that the state promote a community-centric approach to responsible energy development such as ensuring Tribal consultation, resources for local governments and scientific research, promoting supply-chain opportunities, and ensuring community benefits that includes union jobs, apprenticeship opportunities, and career pathways for Oregonians. Sincerely, Heidi Hartman	Thank you for your comment. Additional language has been included in the Roadmap Section 2 (Overview of Offshore Wind Energy Development) to emphasize the importance of Oregon meeting its clean energy and climate goals. The recommended policies and actions in the Roadmap include community-centric aspects similar to those described in this comment, such as Tribal consultation, increasing capacity for local governments and scientific collaboration/research, promoting supply-chain coordination and opportunities, and establishing policies and processes to support the creation of community agreements as part of the decision process.
Marlene Acker	RE: Public Comment on the Oregon Offshore Wind Energy Roadmap — North Oregon Coast Dear Mr. Burright and the DLCD Offshore Wind Energy Roadmap Team, My name is Marlene Acker. I am a native born north coast resident of Nehalem, Oregon. I am writing to provide formal public comment on the draft Oregon Offshore Wind Energy Roadmap. I ask that my comments be included in full in the public record submitted to the Oregon Legislature. The Roadmap identifies four guiding principles: meaningful engagement, credible information, regional coordination, and clear checkpoints. I ask DLCD and the Oregon Legislature to hold them to a higher standard than has been applied to date on the Oregon coast. Specifically: • "Credible information" must mean north coast-specific data. The science compiled to date focused on proposed development areas off	Thank you for your comment. DLCD agrees that credible information should include information from outside a lease area to adequately understand potential cumulative effects from a proposed project. Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) of the Roadmap includes a recommendation that the state amend the Territorial Sea Plan to require a cumulative impact assessment prior to offshore wind leasing, inclusive of considerations such as migratory corridors. It is true that the BOEM siting effort from 2019-2024 focused primarily on areas off the southern Oregon coast due to the stronger wind speeds in the south, but it is also true that wind speeds in the north are strong enough to make offshore wind energy feasible. It is possible that future interest in offshore wind energy could focus also off the north coast, and DLCD agrees that adequate credible information would be needed to support any siting or permitting actions. Section 6.3.2 of the Roadmap recommends a state-led marine spatial planning inventory process, inclusive of federal waters, state waters, and

Name	Comments	DLCD Response
	Coos Bay and Brookings — in southern Oregon. The Dungeness crab nursery habitat of Tillamook Bay and Nehalem Bay, the Buoy 10 salmon fishery at the Columbia River mouth, the razor clam beaches from the South Jetty to Gearhart, and the migratory corridors used by marine mammals along the north coast have not been studied for offshore wind impacts. No credible decision can be made without this data. • "Meaningful engagement" must mean more than comment periods that coastal working families — who fish six days a week — cannot realistically attend. DLCD held no in-person meetings north of Astoria during this process. The communities of Garibaldi, Rockaway Beach, Manzanita, Nehalem, Cannon Beach, and Seaside received no dedicated outreach. • "Clear checkpoints" must include a statutory halt — not just a recommendation — if science is incomplete or tribal consultation is unresolved. Checkpoints without enforcement are not checkpoints. I support Pathway 1: No Offshore Wind Energy. Oregon should not participate in offshore wind energy development in any form at this time, and should reserve its coastal ocean for its existing beneficial uses — commercial fishing, recreation, tribal cultural practices, and marine conservation. The north Oregon coast from Cape Meares to Astoria has not been studied for offshore wind impacts. The federal leasing process collapsed in 2024 due to insufficient scientific review and community opposition. Until independent, publicly available science specifically addresses the impacts on north coast fisheries, marine mammals, and tribal resources, there is no basis for any pathway other than this one. I ask DLCD to include the following in its legislative report as unresolved issues specific to the north Oregon coast: • Dungeness crab habitat: Tillamook Bay, Nehalem Bay, and Netarts Bay support some of the most productive Dungeness crab fisheries in Oregon. The commercial fleet operating out of Garibaldi has achieved national recognition for low dead-loss rates and live crab quality. No study has examined how subsea cables, anchor systems, or electromagnetic fields from offshore wind infrastructure would affect crab behavior, migration, or nursery habitat in these bays. • Columbia River salmon fishery: The Buoy 10 fishery at the mouth of	onshore, to provide a comprehensive understanding of areas that are highly valued or that would likely be found inconsistent with state protective policies if a project were proposed there. Additional details have also been added to Section 6.6.3 (Strategy: Protect and Maintain Optimum Management and Uses of Oregon's Fisheries), describing the types of areas where impacts from offshore wind energy should be avoided. All meetings of the Roadmap Roundtable were available virtually and posted on YouTube, with opportunity for public comment at each meeting. DLCD also hosted public meetings in Seaside and Astoria at various points in the Roadmap process, as well as three virtual public meetings during the comment period for the draft Roadmap. DLCD held a virtual public meeting in July 2025 focused specifically toward the concerns and interest of fishing communities, and we met individually with four seafood commodity commissions during Roadmap development. The point is well-taken however that future engagement efforts need to consider the schedules of working families - particularly fishing communities - during times of high fishing effort. Section 6.6.3.8 (Action: Sustain ongoing engagement with fishing communities by supporting fishing community groups focused on marine energy) includes recommendations for sustaining ongoing engagement with fishing communities by supporting fishing community groups focused on marine energy, including fishing groups in the north, central, and south coast. Additional discussion has been added to the "checkpoints" call-out in Section 4.1.2 (Checkpoints: Where Oregon Can Influence Whether and How to Move Forward), describing how the state may have formal mechanisms to exit one pathway and follow another.

Name	Comments	DLCD Response
	the Columbia River is one of Oregon’s most significant recreational and commercial salmon fisheries. The Port of Astoria and Warrenton support a commercial fleet targeting Chinook, coho, tuna, halibut, groundfish, shrimp, and crab. Any offshore infrastructure that alters the current system or migration patterns along the north coast would affect this fishery directly. • Razor clam beaches: The beaches stretching south from the Columbia River’s South Jetty through Gearhart and Seaside represent some of the best razor clamming habitat south of Alaska. This is both a commercial and recreational resource. The impact of increased vessel traffic, subsea noise, and altered sediment transport on clam habitat has not been studied for the north coast. • Viewshed and tourism economy: Communities from Cannon Beach to Astoria depend heavily on coastal tourism. Industrial offshore turbines visible from the shoreline would affect property values, tourism revenue, and the character of communities whose economies are built on coastal access and scenery. • Marine mammal corridors: The north coast supports seasonal populations of gray whales, Steller sea lions, harbor seals, and Dungeness crab-dependent sea otters. No acoustic or behavioral impact study has been conducted for these populations relative to the north coast. I ask that the final Roadmap submitted to the Legislature include the following recommendations: • Fund a north coast-specific offshore wind impact research program, distinct from studies focused on southern Oregon, before any pathway beyond Pathway 1 or 2 is pursued. • Require statutory — not merely advisory — checkpoints before any leasing or permitting activity may proceed. Recommendations without enforcement authority are insufficient protection for fishing communities. • Establish a North Coast Fisheries Advisory Panel, including representatives from the Garibaldi commercial fleet, Astoria and Warrenton port communities, Nehalem Bay and Tillamook Bay operators, and the Columbia River commercial fishing industry, to provide binding input into any future siting process.	

Name	Comments	DLCD Response
	Prohibit offshore wind leasing in any area designated as Dungeness crab critical habitat, salmon migration corridor, or tribal cultural resource area until independent science has determined impacts are acceptable to affected communities. The ocean is the commons. It belongs to the fishing families of Garibaldi and Astoria, to the crabbers working Nehalem Bay, to the charter operators launching from Tillamook Bay, and to the tribal nations whose cultural connection to these waters predates the state of Oregon itself. It does not belong to energy developers or to state energy mandates written without adequate consultation with the people who depend on it. I ask that DLCD transmit to the Oregon Legislature a clear record of the depth and specificity of north coast opposition, the unresolved science gaps for this region, and the community's expectation that no pathway beyond economic participation will be pursued until those gaps are filled. Thank you for the opportunity to comment. Respectfully submitted, Marlene Acker, Nehalem, OR	

Name	Comments	DLCD Response
Brandon Chestnut	Dear who it may concern, I really don't think wind/wave energy getting put in our fishing grounds is the right move. They have some on the east coast and it cost mor money to maintain them and fix them then we get in energy. You'd be taking away so much fishing grounds in a already controlled environment. Please do not put this in and take more away from us fishermen. Thank you	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.
Mike Szumski	<i>Please refer to the 6-page letter dated April 25, 2026 from Mike Szumski, PhD</i> Attached are my comments regarding the State's Offshore Wind Roadmap. I focus on BOEM's improper use of seabird data to select its Wind Energy Areas and the need for a second, independent assessment.	Thank you for your comment. A response to the attached letter is included separately.
Heike M. Eubanks	I would like to comment on the new road map for wind energy off the Oregon South Coast. I believe we need to find ways to develop alternative sources of energy, and wind energy is one of them. As with all such projects we should consider the impact on the environment and don't do more harm than good. It would be wise to look at all other possible ways to generate electricity. Wave action is one of them, so is solar, but I want to put in a good word for geothermal. Earth energy can be used even in unusual places like Washington, D.C. No, not what you might think. There is an example right across from the Capitol-- The Friends House, built in 1917 and owned by the Quaker peace lobby "Friends Committee on National Legislation" that was remodeled in 2021 into a LEED certified green building with geothermal heat derived from wells under the house and other features. Oregon being a place with lots of geothermal activity should definitely consider tapping into these resources. Geothermal is not a new technology and is used in many places. There is a pilot project at Newberry Crater already... close to Bend already! Creating new sources of electricity also will require infrastructure for transmission and proximity to places of end use the better. This said, I am glad that Oregon will have more say when it comes down to be considered. Thanks for listening! Heike M. Eubanks, Myrtle Point, OR	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Name	Comments	DLCD Response
Larissa Karen Lima Silva	Dear Valued Customer, We are pleased to introduce an exclusive opportunity designed to support entrepreneurs and business owners worldwide. As part of our commitment to expanding our global presence and empowering businesses, we invite you to open a local or offshore domiciliary business account with our bank. Upon successful account opening, you will automatically become eligible to apply for business loans ranging from a minimum of USD 5,000 up to USD 2,000,000. Once approved, the loan amount will be credited directly into your account, enabling you to start, grow, or invest in your business with ease. Key Benefits of This Offer: 1. Loan amounts granted to applicant 2. Competitive annual repayment rate of just 2% 3. Maximum loan tenure of up to 15 years First year repayment-free (interest begins from the second year) This initiative is part of our mission to reach and support business-minded individuals across the globe, providing accessible capital to help turn ideas into successful ventures. We encourage you to take advantage of this opportunity and partner with us in building a stronger financial future. For more information or to begin your application, please contact our team or visit your nearest branch. Warm regards, Steadex Bank Account Team Email: acct-activation@steadexinternational.com Website: https://steadexinternational.com	
Christopher Hall (4) Water League	<i>Please refer to the 123-page letter dated April 22, 2026 by Christopher Hall on behalf of Water League. (Link to comment: https://www.oregon.gov/lcd/OCMP/Documents/Water-League-Public-Comment_OSWRoadmap_042226.pdf)</i> Thank you, Jeff. Over the weekend I caught a few edits and have reattached the updated file -- please use the version attached to this email. Chris	

Name	Comments	DLCD Response
Ann Vileisis Roundtable member Kalmiopsis Audubon Society	<i>Please refer to the 4-page letter dated April 27, 2026 by Ann Vileisis on behalf of the Kalmiopsis Audubon Society.</i> Hi Jeff, Here are comment for the DLCD's roadmap from a coalition of Oregon-based wildlife groups. All best! Ann Vileisis, President Kalmiopsis Audubon Society, Port Orford, OR	Thank you for your comment. A response to the attached letter is included separately.
Jena Carter (2) Roundtable member The Nature Conservancy	<i>Please refer to the 8-page letter dated April 27, 2026 by Jena Carter on behalf of The Nature Conservancy in Oregon.</i> On behalf of The Nature Conservancy in Oregon, I am writing to submit our comments on the draft Offshore Wind Energy Roadmap. We appreciate the extensive listening and analysis reflected in this version of the document as well as your continued commitment to integrate feedback throughout the process. Please don't hesitate to contact me or Lauren if you have any questions regarding our comments. – Jena	Thank you for your comment. A response to the attached letter is included separately.
Yelena Nowak Oregon Trawl Commission	<i>Please refer to the 4-page letter by Yelena Nowak on behalf of the Oregon Trawl Commission</i> Hello Jeff, Please see attached comments from the Oregon Trawl Commission regarding the Oregon Offshore Wind Energy Roadmap. Please let me know if you have any questions or may need more information. Sincerely, Yelena Nowak, Director Oregon Trawl Commission	Thank you for your comment. A response to the attached letter is included separately.
Anthony Levenda Climate Jobs Oregon	<i>Please refer to the 6-page letter dated April 24, 2026 by Anthony Levenda on behalf of Climate Jobs Oregon</i> Hello - Please see the attached written comments from Climate Jobs Oregon regarding the Oregon Offshore Wind Energy Roadmap. Please let me know if you have any questions. Thank you for considering these comments. Best, Anthony	Thank you for your comment. A response to the attached letter is included separately.
Nancy Kirshner- Rodriguez Oceantic Network	<i>Please refer to the 5-page letter dated April 27, 2026 by Nancy Kirshner-Rodriguez on behalf of Oceantic Network.</i> Thank you for the opportunity to comment. We look forward to continuing to work with you. Please let me know if you have any questions. Nancy Kirshner- Rodriguez, Senior Director for Policy & Outreach, Oceantic Network	Thank you for your comment. A response to the attached letter is included separately.

Name	Comments	DLCD Response
Casey MacLean Renewable Northwest	<i>Please refer to the 3-page letter dated April 27, 2026 by Casey MacLean on behalf of Renewable Northwest.</i> Good evening, Please see the attached comments from Renewable Northwest. Thank you, Casey MacLean, Washington Policy Manager, Renewable Northwest	Thank you for your comment. A response to the attached letter is included separately.
Bill Bold	Overall I like what I am reading here. This is a well organized attempt to identify key elements of a complex situation. However I do have 2 comments: 1. There are too many permanent-sounding committees and planning groups listed in your key recommendations. The Oregon Wind Energy Science Collaborative for instance. Since the sites are already known it seems to me we are gathering information to decide if they are worth building e.g. what are the trade-offs. Any committees needed here seem short-term in nature and should show up that way in the recommendations. 2. I would like you to add a 5th pathway to the ones listed on page ES-3 of your report. I believe that it would be prudent to set up an organization similar to BPA to build and operate any offshore wind farms off the Oregon coast. Since we are spending money, via your recommendations, to do what is historically part of the developer's job and financial responsibility, why not place the turbines in the optimal locations we set? It seems to me that we will be better off with large scale energy projects like dams and offshore windfarms to have them built and operated by a public entity that has more responsibility to society than a profit motive. Thank for considering my comments. I look forward to reading the final report. -- Bill Bold	Thank you for your comment. In 2025, the sites selected by the Bureau of Ocean Energy Management were formally rescinded. This means that future offshore wind siting could potentially occur anywhere off the coast of Oregon. The Roadmap recognizes an opportunity for the state to lead its own Maine spatial planning inventory process to reconsider the resources and uses in federal waters that are valued by the state. The point made in the comment that the various collaboratives and committees may have limited duration is well taken; however, it may be many years before a project reaches a permitting decision, so groups such as the recommended science collaborative may have a multi-year role. Regarding the concept of public ownership of an offshore wind energy project, the Roadmap does not constrain or recommend who may act as the developer of a project. Under current laws, a public organization such as a community energy group or an existing Public Utility District could theoretically pursue offshore wind energy or purchase a constructed project from the original developer, though the high capital costs and scale of projects may present barriers to full ownership. Public groups may also elect to purchase power produced from a project through a Power Purchase Agreement. While DLCD recognizes the comments made in support of public ownership options, no specific recommended standards or actions have been identified for inclusion in the Roadmap to constrain or promote certain types of project owners over others. The recommendations in the Roadmap are aimed toward strengthening the state's ongoing authority to establish standards and enforce accountability such that any company constructing, operating, or decommissioning an offshore wind energy project must remain consistent with state policies.

Name	Comments	DLCD Response
Max Wilbert Fertile Ground Conservancy	<i>Please refer to the 10-page letter dated April 27, 2026 by Max Wilbert on behalf of Fertile Ground Conservancy</i> Mr. Burright and DLCD staff, Please find attached the public comment of Fertile Ground Conservancy on the February 2026 Public Review Draft of the Oregon Offshore Wind Energy Roadmap. Our comment endorses the "No Offshore Wind Energy" pathway and provides direct responses to all six guiding questions in the Reviewer's Guide. Thank you for the extension of the comment period and for the opportunity to weigh in. Respectfully, Max Wilbert, President, Board of Directors, Fertile Ground Conservancy, Eugene, OR	Thank you for your comment. A response to the attached letter is included separately.
Ranfis Giannettino Villatoro Roundtable member BlueGreen Alliance	<i>Please refer to the 9-page letter dated April 23, 2026 submitted by Ranfis Giannettino Villatoro on behalf of BlueGreen Alliance</i> Hi Jeff, Please accept our BGA comment. Expect an updated letter with labor sign-ons. Ranfis Giannettino Villatoro, BlueGreen Alliance, Oregon St. Policy Manager	Thank you for your comment. A response to the attached letter is included separately.
Julia DeGraw (1) Roundtable member National Wildlife Federation	<i>Please refer to the 25-page letter dated April 27, 2026 submitted by Julia DeGraw on behalf of National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now, BlueGreen Alliance, Electrify Now, Surfrider Foundation, and Oregon Shores Conservation Coalition.</i> Good evening, Please accept the following comments on the draft Oregon Offshore Wind Energy Roadmap, submitted on behalf of the National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Surfrider Foundation, and Oregon Shores Conservation Coalition. Thank you. Julia DeGraw	Thank you for your comment. A response to the attached letter is included separately.

Name	Comments	DLCD Response
Julia DeGraw (2) Roundtable member National Wildlife Federation	<i>Please refer to the 29-page letter dated April 27, 2026 submitted by Julia DeGraw on behalf of the National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, and Oceana.</i> Good evening, Please accept the following comments on the draft Oregon Offshore Wind Energy Roadmap, submitted on behalf of the National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, and Oceana. Thank you. Julia DeGraw	Thank you for your comment. A response to the attached letter is included separately.
Mike Lynes Audubon California	<i>Please refer to the 8-page letter dated April 27, 2026 submitted by Mike Lynes on behalf of Audubon California.</i> Hello, Attached please find comments from Audubon California, the state office of the National Audubon Society, regarding Oregon's Offshore Wind Roadmap. Please let me know if you have any problem opening or reading this file. Thank you for this opportunity to submit comments. Please do not hesitate to contact us if you would like to discuss them. Mike Lynes, Director of Public Policy, Audubon California	Thank you for your comment. A response to the attached letter is included separately.
Julia DeGraw (3) Roundtable member National Wildlife Federation	<i>Please refer to the <u>corrected</u> 25-page letter dated April 27, 2026 submitted by Julia DeGraw on behalf of the behalf of National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now, BlueGreen Alliance, Electrify Now, Surfrider Foundation, and Oregon Shores Conservation Coalition.</i> Please accept this corrected version of the Community of Practice group comments on behalf of National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, and Oregon Shores Conservation Coalition. Thank you, Julia	Thank you for your comment. A response to the attached letter is included separately.

Name	Comments	DLCD Response
Julia DeGraw (4) Roundtable member National Wildlife Federation	<i>Please refer to the <u>corrected</u> 29-page letter dated April 27, 2026 submitted by Julia DeGraw on behalf of the National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, and Oceana.</i> Please accept this corrected version of the comment letter on behalf of, National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, and Oceana. Thank you, Julia	Thank you for your comment. A response to the attached letter is included separately.
Leslie Green	This message may be too late but I was traveling out of the country so I still want to express my full support for all types of alternative energy, including wind and wave energy.	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap.

Table 2. Written Public Comments, Expanded Letter Points and DLCD Responses

Name	Comments	DLCD Response
OAC Wildlife	Update Oregon’s Territorial Sea Plan (TSP) as the top priority We recommend that DLCD prioritizes updating the Territorial Sea Plan as a first concrete step to prepare Oregon for potential future ocean energy development. This recommendation should be included as a key recommendation for policy makers. Updates to TSP Chapters 4 (uses of the sea floor) and 5 (marine renewable energy) should be the highest priority, though Chapter 3 (Rocky habitat) will also likely need to be updated. We are aware that during the April 21, 2026 OPAC meeting, the Council supported DLCD Director Bateman’s request to initiate rulemaking of Chapters 1 and 2 of the TSP. These foundational chapters of the TSP have not been updated for over 25 years. Several agency directives and policies have changed since that time so these chapters are in dire need of an update. Also, OPAC approved a motion recommending DLCD to initiate studies on marine spatial planning, cable routing and visual resources management standards. The completion of these studies are an important first step to inform the eventual TSP parts 4 and 5 updates. We support these OPAC recommendations. The state should use the Roadmap’s enforceable policies gap analysis to identify specific enforceable policies that need to be strengthened to protect submerged habitats and marine wildlife species.	Thank you for your comment. In the Summary for Policymakers, the Roadmap recommends as a near-term priority addressing the policy gaps identified in Section 5 (Enforceable Policy Assessment: Addressing Objectives and Seizing Opportunities) of the document. Many of the gaps may be addressed through updates to the Territorial Sea Plan, and the Ocean Policy Advisory Council is beginning this process in 2026. DLCD will provide staff support throughout any TSP update processes and will represent the gaps identified in the Roadmap as inputs to inform potential amendments.
OAC Wildlife	Participate in West Coast Science Collaborative We recommend that Oregon participate in the West Coast Science Collaborative (WCSC) group currently being established by the California Ocean Protection Council. Although it is premature for Oregon to invest in developing its own wind technical science group at this time, participating in the California group will provide an opportunity to learn, to share information across the CCLME, and to find possible opportunities for collaboration. A member of OPAC’s Science and Technical Committee (STAC) should be considered as the Oregon representative on the West Coast Science Collaborative. Participation in the WCSC group will provide Oregon with greater knowledge and the latest science about impacts and how to avoid them as well as about emerging developments along the southern	Thank you for your comment. This recommendation is reflected in the Roadmap in Section 6.3.2.4 (Action: Participate in a regional offshore wind energy science collaborative). While DLCD is aware that the West Coast Science Collaborative initiated by California is currently on hold, representatives from Oregon may participate in this collaborative or a similar effort once it is active.

Name	Comments	DLCD Response
	border of our outer continental shelf. As federal support for marine science has been substantially reduced, this is particularly important.	
OAC Wildlife	Support for cumulative impacts analysis requirement We appreciate that the Roadmap has identified the need to require an evaluation of cumulative impacts across the CCLME as part of the strategy to protect natural resources as cultural resources (p. 132). We'd like to see the requirement for a CCLME-wide cumulative impacts assessment elevated as a key part of the overall strategy to protect species and the environment. The Roadmap identifies the benefit of an earlier conceptual cumulative impacts analysis before leasing but then also the requirement for a more complete cumulative impacts analysis before the State would issue a consistency determination. We'd like to see greater clarity on the timing of these analysis and also specificity that the cumulative impacts analysis should include climate change projections including shifting species distributions, oceanographic conditions, and habitat dynamics. Elucidating the requirements for a cumulative impacts analysis is especially important since the current administration has recently eliminated this very important, longstanding requirement from the National Environmental Protect Act review process. It's unclear what will happen to NEPA in the future, but it's clear that the state of Oregon will need to step-up to ensure that this fundamental aspect of analysis and planning be part of any potential marine energy development process.	The recommendation in Section 6.3.2.3 (Action: Clarify the timing of a cumulative impact assessment and other information needs before leasing and permitting) concerning the timing and content of cumulative impact assessment at the leasing and permitting phases has been revised to clarify the two different types of analysis recommended for each phase. Further clarification has also been added regarding expectations that the analysis includes climate change projections as indicated in the comment.
OAC Wildlife	Support for holistic whole project approach We appreciate that the Roadmap identifies the need for a whole project approach –including consideration of the location of onshoring facilities and transmission requirements. State reviews of offshore wind energy authorizations should consider the costs, benefits, and cumulative effects of dependent or interrelated shoreside and in-estuary development.	Thank you for your comment. The recommendation is reflected in Section 6.3.3.1 (Action: State reviews of offshore wind energy authorizations should consider the cumulative effects of dependent or interrelated shoreside and in-estuary development).

Name	Comments	DLCD Response
OAC Wildlife	Include robust analysis of estuaries Before the state advances port development in the Coos Bay Estuary—the state’s largest estuary complex – in support of developing a wind energy industry, there needs to be a more robust and thoughtful estuary planning process. This estuary provides valuable nursery grounds for crabs and coho as well as important eelgrass beds that provide habitat for migratory shore birds and wildlife. Coos Bay is a critical high-density Important Bird Area (IBA) on the coast. The estuary supports ecosystem services and also seafood industries. Dredging a deep channel needed for enormous ships would have unknown and irrevocable impact on hydrology and ecology of the estuary. A more thoughtful costs and benefits is needed.	A new recommended action has been added to Section 6.3.3.2 (Action: Support capacity funding to update estuary management plans in local government comprehensive plans) related to providing capacity funding to local governments for estuary planning, with a specific mention of the Coos Bay Estuary Management Plan update process. This need is also highlighted in Table A-4 in Appendix A (Enforceable Policy Assessment).
OAC Wildlife	Support for using Oregon’s Federal Consistency review to assure meaningful adaptive management We appreciate and support the Roadmap’s recommendation to establish a framework for monitoring up front to provide for meaningful adaptive management, including use of the forward looking “consistent with conditions” mechanism of the Federal Consistency Review to specify monitoring requirements and prescribed responses should unacceptable conditions arise after construction, during project operations.	Thank you for your comment.
OAC Wildlife	Include “Net Positive Impact” in addition to mitigation hierarchy We urge DLCD to include a provision in the Roadmap for a "Net Positive Impact" on the environment. If FOSW comes to Oregon, we want to ensure that harm to species and ecosystems is offset not only by mitigation of harm but also by a positive contribution that.(sic) This might include artificial reef construction or the requirement to enhance habitat for seabirds elsewhere. In the BOEM process, we found there was no consideration of compensatory mitigation for the environment. Identifying an expectation for net positive impact would ensure that wind energy developers start thinking early about how to make their projects provide ecosystem benefits.	A recommendation to consider a Net Positive Impact standard has been added to the enforceable policy assessment table in Section 5.1 (Policy Assessment Overview), for consideration during updates to the Territorial Sea Plan. This has also been highlighted in Table A-4 in Appendix A (Enforceable Policy Assessment).

Name	Comments	DLCD Response
OAC Wildlife	Support visual resources management assessment We support the Roadmap’s inclusion of a visual resources management assessment, as has been recommended by Tribal nations and by natural resource professionals with visual assessment experience. The State of Oregon has a strong heritage of conservation of State Parks with scenic views while Tribal nations have identified views as part of their much longer cultural heritage. These values should be upheld in the Roadmap.	Thank you for your comment.
OAC Wildlife	Support for maintaining Roadmap’s four possible futures framework While some have argued for the Roadmap to more directly advance the aim of placing turbines into the water, we support the draft Roadmap’s consideration of four possible frameworks as a rubric to help decision makers understand the wide range of opportunities with a range of costs and benefits.	Thank you for your comment. The multiple futures, including those with turbines and without, will be retained in the final Roadmap in consideration of the fact that multiple potential futures for Oregon are possible, and each benefits from advance consideration and planning.
OAC Wildlife	Support for comparative analysis for different future energy pathways including lifecycle analysis and substantive cost benefit analysis Given the Oregon Department of Energy’s recent Energy Strategy did not include a recommendation to pursue the uncertain technology of floating offshore wind energy at this time, we recommend that the State do a more robust consideration of which renewable energy source can most quickly, cost-effectively and efficiently help to reduce greenhouse gas emissions. A robust consideration means not only the levelized cost of energy-based on theoretical models but credible and complete cost projections that account for construction in remote locations proposed for development –including costs of transmission upgrades. To advance floating offshore wind energy without a credible understanding of the true costs and benefits undermines support for this uncertain technology that will have impacts on other important values, including wildlife and fisheries.	Additional language has been added to the recommended action in Section 6.2.3.1 (Action: Continue to refine the <i>Oregon Energy Strategy</i> to reflect changing conditions in offshore wind energy technology and the regional energy market) to provide further guidance on the nature of a cost-benefit analysis that is recommended for inclusion in future revisions to the Oregon Energy Strategy.
OAC Wildlife	Support for clear strong decommissioning requirements We support the Roadmap’s recommendation to clarify requirements for project decommissioning and for sufficient financial assurances to support decommissioning.	Thank you for your comment. These recommendations are reflected in the Roadmap Section 6.3.2.9 (Action: Establish clear decommissioning expectations and require adequate financial assurance at the permitting phase).

Name	Comments	DLCD Response
OAC Wildlife	Support for Roadmap guiding principles We support the guiding principles in Section 3 of the Roadmap—meaningful engagement, credible information, regional coordination, and a holistic and accountable approach. In particular, we support inclusion of perspectives of Oregon Tribes and local communities.	Thank you for your comment.
Climate Jobs Oregon	In addition to providing independent modeling, our report¹ can also inform the following actions recommended in the Roadmap: • Explore potential economic incentives, energy planning policies, procurement frameworks and authorities, or other amendments to Oregon energy policy that might attract and facilitate long lead-time resources such as offshore wind energy; • Strengthen and enforce labor and safety standards; • Conduct supply chain and workforce assessment and planning; and • Develop a workforce development and training plan.	Thank you for your comment. These recommendations are reflected in the Roadmap in Section 6.2 and 6.7 (Achieve State Energy and Climate Policy Objectives and Create an Offshore Wind Energy Workforce that Is Local, Housed, Trained, and Equitable Objectives, respectively), further described in responses to more detailed comments below.
Climate Jobs Oregon	Pilot central offshore energy procurement to attract and facilitate offshore wind energy In section 6.2.2., the Roadmap calls for the state to explore procurement frameworks that facilitate long lead-time resources like offshore wind. The state should do that by piloting a centralized electricity procurement process that grants a state agency the authority to procure competitive, long-term contracts from offshore wind projects on behalf of ratepayers. Central procurement has the potential to send clear market signals to offshore wind developers and utilities¹ to spark the development of offshore wind in Oregon as a new viable market. Under this pilot central procurement policy, the Oregon Public Utilities Commission (OPUC) would determine a maximum procurement cap based on a combination of factors. After the OPUC determines the cap, the procuring agency will be able to accept bids for contracts that meet legislative and regulatory standards, including labor standards from HB 4080. The process of establishing procurement standards, evaluating contracts, and approving projects	Thank you for your comment. Section 6.2.2 (Strategy: Explore Policies and Investments to Create a Future Energy System that Can Meet Oregon’s Energy and Climate Goals, Prepare for Offshore Wind Energy Potential) includes an action to explore potential economic incentives, energy policies, procurement frameworks, or other amendments to Oregon energy policy to attract and facilitate long lead-time resources such as offshore wind energy. The concept of a pilot centralized procurement process has been added as one of the examples for consideration in the recommendation.

¹ Climate Jobs Oregon, in collaboration with Cornell University's Climate Jobs Institute and the state's building trades unions, identified policy pathways to address climate change and inequality. Their joint efforts produced the report, *A Bold Vision for Climate Jobs in Oregon*, focusing on building clean infrastructure, reducing emissions, and enhancing access to high-quality union jobs. <https://www.ilr.cornell.edu/climate-jobs-institute/report-summary/bold-vision-climate-jobs-oregon>

Name	Comments	DLCD Response
	between the OPUC and the procuring agency adds multiple rounds of public oversight to the process. State-procured energy would then be purchased at cost by the state’s investor-owned utilities (IOUs) and by public-and consumer-owned utilities who are interested in purchasing offshore wind energy. The OPUC can require IOUs to purchase offshore wind energy through existing policies, such as renewable portfolio standard, the integrated resources planning process, and clean energy plans. A centralized procurement policy should also include a process for public- and consumer-owned utilities to opt in to procurement of this energy. Aggregating utility and ratepayer demand for offshore wind energy creates attractive contract solicitation opportunities, spreads costs among ratepayers of multiple utilities, and allows smaller, publicly-owned utilities to access offshore wind energy that could otherwise be unattainable.	
Climate Jobs Oregon	Best value procurement can further promote labor and safety standards in offshore wind projects Climate Jobs Oregon strongly endorses the Roadmap’s recommendation to strengthen and enforce labor and safety standards. Energy procurement laws can be vehicles to enforcing labor and safety standards. Alongside centralized procurement, Oregon should utilize a “best value” method of procurement that would require the procuring agency to weigh factors beyond energy price and the current definition of “responsibility” in public contracts, with enforcement and accountability for contractors who do not adhere to these terms. The U.S. Employment Plan (USEP) by Jobs to Move America is an exemplary model that states and localities have adopted across the country to put their public dollars to work creating high-quality, local jobs without significantly impacting price or competition. Under the USEP, the procuring agency would evaluate bids from offshore wind projects based on multiple factors, not solely price, to ensure maximum public benefit. In addition to weighing past performance and reliability, the bid review process would also weigh employment plans, including local job creation, support for workforce development, and environmental and social impacts of the offshore wind project. This will incentivize bidders to create career paths	Thank you for this additional detail regarding state procurement benefits. The description of a potential state-led procurement option in Section 6.2.2.2 (Action: Consider a policy that would require offshore wind energy in Oregon to connect to Oregon’s coastal grid) has been revised to include concepts described in this comment.

Name	Comments	DLCD Response
	through registered apprenticeships for underrepresented groups that pay family-sustaining wages, provide good benefits, and invest locally, while ensuring fair competition impact without raising overall project costs. California’s bidding credit model offers an example including workforce development, Lease Area Use Community Benefit Agreement (CBA), and General CBA commitments.	
Climate Jobs Oregon	Support co-enforcement model to strengthen and enforce labor and safety standards The state can also enforce labor and safety standards by replicating and expanding the scope of its strategic co-enforcement model and reforming administrative authority and reporting standards. Particularly, the Oregon Bureau of Labor and Industries (BOLI) could form a strategic co-enforcement unit for private projects with mandated workforce and contractor labor standards and extend BOLI’s scope beyond wage violations to violations of all required labor standards on such projects. BOLI’s existing Proactive Investigations and Enforcement Unit (PIE) is an applicable model that could be expanded, for example. Oregon must also require public reporting for all relevant employment and payroll records, with requisite ease of accessibility to such records, for this strategic unit to enforce all required labor standards on projects. As such, Oregon should recentralize certified payroll reporting at BOLI rather than continue to be disaggregated across public agencies. Additionally, the state should require certified payroll reporting for any projects that must comply with prevailing wage rate standards, not just public works or public improvement contracts. This targeted strategic co-enforcement model could prevent fewer labor violations from not being investigated by ensuring staff assigned to the unit can specialize in this work in particular geographic areas, freeing up BOLI staff capacity in other areas.	Thank you for your comment and recommendation. DLCD consulted with BOLI on this comment. It was noted that centralizing certified payrolls at BOLI would apply to a much larger body of work than offshore wind energy-related projects alone (e.g., all of BOLI’s prevailing wage work), and the changes recommended would require both a legislative change and increased funding for the agency to accomplish the additional work scope.

Name	Comments	DLCD Response
Climate Jobs Oregon	Conducting a supply chain and workforce assessment and planning to meet Buy American requirement In section 6.6.2., the Roadmap calls for the state to coordinate and participate in a supply chain assessment and planning in addition to a workforce assessment and planning. A supply chain assessment and planning is critical in the Roadmap along with meeting legislative mandates. Manufacturing is apparent in all but one of the four alternative futures. Additionally, HB 4080 requires offshore wind developers to adhere to a Buy American requirement. A supply chain assessment should evaluate the impact of the Buy American requirement including ways in which infrastructure and other capital investment may support the on-shoring of the supply chain. Moreover, the supply chain assessment should also analyze the impact of the expansion of the parameters of the Buy American requirement. The Buy American requirement in HB 4080 mandates developers or contractors purchase or use steel, iron, coatings for steel and iron, and manufactured components be produced in the United States on contracts \$250,000 or more.⁹ The state should consider adopting language to encompass a wider range of products, such as transmission cables, and apply to other types of contracts.¹⁰ Unlike other labor standards, the Buy American requirement is triggered by a dollar threshold. The threshold should be lowered to \$50,000 to expand the breadth of impact which helps improve the domestic supply chain and reduce cost of transportation.	Thank you for this recommendation. The discussion of the supply chain assessment in Section 6.6.2.4 (Action: Conduct supply chain and workforce assessment and planning) has been expanded to include a recommendation to evaluate the impacts of the standard in HB 4080 to buy necessary materials manufactured in the United States, when available, and inform potential future proposals to amend this policy. This is also a highlighted need in Table A-4 in Appendix A (Enforceable Policy Assessment).
Climate Jobs Oregon	Expanding proven workforce development programs with wraparound services as an equity component to a workforce development and training plan The Roadmap’s recommended action to develop a workforce development and training plan should focus on expanding supports within state-registered apprenticeships. Supportive services have included childcare payments, tools or protective equipment, travel support, hardship assistance, and several non-financial services. To meet projected labor demand while creating a more diverse and equitable union clean energy workforce, Oregon should expand models for state-registered apprenticeship retention and workforce diversity.	Thank you for these suggested additions. The description of the workforce development and training plan in Section 6.7.1.2 (Action: Create a workforce development and training plan) has been revised to reflect the suggestions.

Name	Comments	DLCD Response
Renewable Northwest	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.	Thank you for your comment. Through the Roadmap development process, the Roundtable advisory group received informational presentations from the Oregon Department of Energy, Bonneville Power Administration, the Public Utilities Commission, and the Pacific Northwest National Laboratories about Oregon's projected energy needs and challenges. The Roadmap process also occurred alongside the development of the ODOE Energy Strategy, which evaluated pathways for Oregon to meet its clean energy goals by 2050 through a variety of policies, investments, and generation options. We agree with the statement that regional electricity demand is expected to rise significantly, and meeting this demand with non-greenhouse gas emitting sources will be challenging. The Roadmap recognizes that offshore wind energy may be an attractive option to help Oregon achieve its clean energy goals and meet future demand, while also recognizing that this development must occur responsibly, balance many interests, and be consistent with the state's land use planning goals and other enforceable policies that protect resources, uses, and communities of the coastal zone. While the recommended policies and actions identified in the Roadmap may appear daunting to some, including potential offshore wind developers, those who participated in the Roadmap development process recommended them as important safeguards to meet the objectives established in House Bill 4080 and reduce the likelihood of adverse effects, lost value, and opposition from communities or Tribes. Many of the action recommendations would necessitate investment by the state, federal government, interested third-parties, or the developers themselves. The costs of these actions would similarly be dispersed at multiple scales as part of the risk of bringing a relatively novel new energy source to high-value marine areas and coastal communities. However, many of the actions are process recommendations representing guiding principles related to meaningful engagement, regional coordination, and risk-aware decision-making. The Roadmap also recommends actions to reduce risks for developers, such as exploration of new procurement mechanisms, investment in transmission infrastructure that would need to be developed before offshore wind projects could be connected to the grid, and science

Name	Comments	DLCD Response
		collaboration activities that may better prepare the state and affected communities to understand the true science-based risks and uncertainties and ultimately improve the efficiency of permit reviews. Taken together, DLCD believes that the Roadmap provides a balanced path that can guide successful development while protecting Oregon's interests and the objectives of HB 4080.
Renewable Northwest	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.	The policy gap table in Section 5.1 (Policy Assessment Overview) is not intended to evaluate the effects of not developing offshore wind energy in Oregon. Its purpose is to identify aspects of Oregon's policy landscape that may not adequately satisfy the objectives in House Bill 4080 due to unreviewed or uncontrolled effects resulting from offshore wind energy development. The gaps include policy recommendations to address effects that are not already covered by Oregon policies for an offshore wind project specifically - such as invasive species, oil releases, waste management, or visual resource effects - as well as recommended clarifications to existing policies that will improve the state's position to negotiate protections for state coastal uses and resources in federal waters where these projects are likely to be sited (e.g., protection of fisheries and important habitats). It should be noted that the gap table does also include policy recommendations that address risks to successful development. The Roadmap's Enforceable Policy Analysis found that most of these gaps may be addressed through revisions to Oregon's Territorial Sea Plan. The state of Oregon has a precautionary approach to ocean development embedded within its statewide land use planning goals, with a priority of preserving the renewable living resources of the coastal zone over non-living resources. DLCD maintains that for any new use of the ocean development effort to proceed responsibly, it must do so consistently with this goal.
Renewable Northwest	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	Thank you for these detailed comments. The language in the green introductory callout box in Section 6.2 (Achieve State Energy and Climate Policy Objectives) has been revised to remove the referenced phrase and replace it with, "under any future path" to better meet the intent of the sentence. DLCD agrees with the comment that energy produced off the coast

Name	Comments	DLCD Response
	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.	of Oregon and purchased by ratepayers in another state would still result in energy resiliency and reliability benefits to Oregon energy users, but without first landing that power near Oregon load centers and instead landed in California or Washington, those sources would be vulnerable to interstate grid disruptions and load congestion between the point of generation and Oregon users. Additionally, if energy produced off the coast of Oregon is consumed by ratepayers in other states, then those states would be achieving their own renewable energy goals at the risk of Oregon state coastal uses and resources, while also obligating Oregon to develop energy in other areas of the state to meet its own energy goals. When the Roadmap describes transboundary equity issues, it is referring to outcomes such as these. However, it may be true that these potential issues could be balanced through improved regional transmission infrastructure or access to lower cost energy options originating in other states. The Roadmap merely recommends that these costs and benefits warrant evaluation and discussion as part of interstate energy planning and policy. Consistent with this comment, the state-led procurement concept or procurement mandate will remain an opportunity to explore, without a specific recommendation in the Roadmap whether it should be pursued.

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Renewable Northwest	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.	Thank you for your comment.
CTCLUSI	Tribal Consultation and Coordination: The Roadmap should incorporate consultation with Tribes at each major decision point along the offshore wind approval process. Early and consistent consultation are essential ways to ensure that Tribal concerns are considered and addressed – preferably early in the process. The goal of consultation should be to reach consensus with Tribes. To that end, the Roadmap should call for the early development of a Tribal/State process once a wind energy proposal is made that incorporates impacted Tribes and state regulatory agencies to provide an early table for state/tribal discussions. This process was previously convened by the State for the Jordan Cove Energy proposal. The State should also identify resources and funds for Tribal participation in the wind energy process – Tribes will experience the impacts of energy develop and receive little benefits. This environmental justice impact should be acknowledged and funding identified to ensure meaningful participation to minimize	DLCD agrees that the Roadmap should incorporate Tribal consultation at each major state decision point along an offshore wind energy process. This is consistent with the agency’s government-to-government consultation policy, Executive Order 96-30 (State/Tribal Government Relations), and the federal consistency notification and consultation procedures that were formally established within the Oregon Coastal Management Program in 2022. Within the Roadmap, Section 6.4.8.4 (Action: Require ongoing communication between the State, Tribes, and developers) includes a recommendation that the state enact an ongoing coordination discussion between the state, energy developers, and Tribes, beginning after the leasing stage and continuing through the period before submission of a Construction and Operations Plan for BOEM review, as well as during the state’s Federal Consistency review of the COP. This recommendation references the previous Jordan Cove LNG

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	those impacts. Lastly, the State should ensure that its authority is exercised in a way to ensure that any wind energy proponent is required to coordinate with Tribes throughout the approval, design, and operation process for wind energy and Tribal staff is included, at the developers' expense, in any monitoring related to cultural resources. The Tribe also recommends that the final Roadmap incorporate the finds and recommendations of the April 2025 GAO report (GAO-25-106998) that found that the Department of the Interior has gaps in its approach to tribal consultation regarding offshore wind development. Tribal officials reported insufficient capacity to review projects, prompting a GAO recommendation for Congress to strengthen support for tribal engagement, which the Interior Department generally agreed with. Key findings regarding Tribes and the GAO report include: - o Inadequate Consultation: The Bureau of Ocean Energy Management (BOEM) has gaps in its approach to tribal consultation and the incorporation of Indigenous knowledge. - o Capacity Limitations: Almost all interviewed tribal officials reported lacking the capacity for meaningful consultation and review of project documents. - o Call for Reform: The GAO recommended that BOEM improve its documentation of tribal input and address limitations in its authority to provide funding to Tribes for capacity building. - o Concerns: Key tribal concerns include impacts on sacred sites, viewsheds, and restricted access to fishing grounds.	export terminal project coordination as an example to follow. Section 6.4.11 (Strategy: Tribal Capacity Needs to Support Offshore Wind Energy Engagement) addresses Tribal capacity needs to support offshore wind energy engagement and recommends potential options for the legislature and state leadership to consider responding to this need. Options include capacity grants from federal, state, or third-party sources; cost recovery support; and direct support from the Legislature for full-time equivalent staff positions. Regarding Tribal participation in monitoring for effects to cultural resources, Section 6.4.3 (Strategy: Protection of Archaeological Resources, including Underwater Villages) includes five recommended actions: --Place Tribal coordination and oversight conditions on future offshore wind energy activities - including a requirement for Inadvertent Discovery Plans and geotechnical survey coordination with Tribes and SHPO --Require Qualified Marine Archaeologists for certain offshore exploration activities near landforms that are familiar to Tribes as potentially culturally important --Include the opportunity for Tribal observers during offshore activities that may disturb ecology aboard vessels or by alternate means --Include conditions on state decisions requiring Tribal oversight of ground disturbing activities, with compensation for this service. --Ease federal credentialing requirements for Tribal participation in archaeological activities The Roadmap currently describes the 2025 GAO report in Appendix C alongside other relevant offshore wind energy-related research. A reference to the GAO report will be added to the main body of the document within Section 3.2.1 (Meaningful Engagement) and 6.4 (Protect Tribal Cultural and Archaeological Resources, Culturally Significant Viewsheds, Subsistence Activities, and other Interests of Tribes).

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CTCLUSI	Housing Impacts: The Oregon Coast is facing a severe housing shortage driven by a tourism-dominated economy, high volumes of short-term rentals, and investor-driven home flipping, which outpaces local wages. Many residents, particularly in coastal towns, struggle to find affordable housing, with the crisis impacting workforce stability and long-term community identity. Any project that results in a short- or long-term increase in housing needs, such as an energy project, will make the problem worse. The Roadmap must include measures that require a study of housing sufficiency and measures to address housing affordability and availability should impacts occur as a result of new projects.	Thank you for the recommendation and for highlighting the housing challenges on the coast that may result from large-scale offshore wind energy development. Effects to coastal communities are addressed in Section 6.5.3 (Strategy: Community Agreements as a Formal Part of the Process), which discusses enforceable community agreements to support coastal communities. This section envisions the potential for new state policies to require mitigation of reasonably foreseeable effects to coastal communities, supported in part by community needs assessment studies (Section 6.5.1.5, Conduct community needs assessments to support future community agreement negotiations action and Section 6.7.1.4, Assess policy and investment needs to support a future offshore wind energy workforce, including housing, infrastructure, and social support services action) so communities can arrive at the negotiating table with the information and resources needed to effectively participate. This action includes the recommendation: "The state should proactively assess these community needs and the associated costs—such as housing, infrastructure, social services—under different development scales to better understand the challenges and investment required." Language has been added to Roadmap Section 6.5.2.2 (Action: Develop new Enforceable Policies requiring net benefit to coastal communities for large-scale coastal development) to include an expectation for the state to coordinate with communities named in community agreements to understand and verify the sufficiency of benefit proposals relative to anticipate effects. Language was also added to Section 6.5.1.5 (Action: Conduct community needs assessments to support future community agreement negotiations) to specifically include a housing impact analysis as part of the recommended community needs assessment.

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CTCLUSI	MMIW: Energy projects and resource extraction are linked to the Missing and Murdered Indigenous Women (“MMIW”) crisis through “man camps”—temporary housing for workers that increase sexual violence, crime, and drug trafficking in nearby communities. The Roadmap should acknowledge this issue and propose measures to mitigate the risk. These could include requiring developers to develop safety protocols and worker code of conduct to prevent violence and trafficking, requiring all project workers to undergo training on local Indigenous culture, the MMIW crisis, and the consequences of harassment or violence, implementing strict, secured, and drug-free housing for transient workers, including on-site security and monitored access points to prevent outside human trafficking, establishing text- or call-based alert systems to immediately inform community members of missing persons, as traditional AMBER alerts may not apply, and providing dedicated funding for tribal police to increase patrols near project sites and to support victim service centers.	Thank you for providing these specific recommendations. They will be added to the description of the recommended action in Section 6.4.12.1 (Action: Require Tribal-informed Safety and Missing and Murdered Indigenous People (MMIP) Protection Plans).
CTCLUSI	Early Assessment of Impacts: The Tribe has consistently stated that early assessment of impacts is essential to determine necessary mitigation and whether a proposed project is even appropriate for a specific location. Accordingly, the Roadmap should contain measures that “frontload” environmental and cultural resource impact analysis before the leasing stage, including a cumulative impacts analysis.	The recommended action in Section 6.3.2.3 (Action: Clarify the timing of a cumulative impact assessment and other information needs before leasing and permitting) states: “Roadmap participants recommend that no additional leases be issued offshore of Oregon until a cumulative impact assessment is completed, and that the state should consider requiring this assessment through an amendment to the Territorial Sea Plan. At the leasing phase, a cumulative assessment can be a conceptual assessment of how a project might affect state coastal resources and uses. It does not need to answer all questions or uncertainties about specific project configurations or technologies in the lease area, since final project designs and subsea cable routing cannot be determined before a project applicant exists, and some site-specific effects cannot be known until detailed site characterization, and a full project plan are developed. A sensitivity analysis should be included to test the relative effects of different likely project proposals and to identify uncertainties that may remain until either a project proposal is available, or a project is installed and its actual effects can be monitored directly. Sensitivity analyses could also explore scenarios involving potential changes to ocean species and habitats.

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		A cumulative assessment could help evaluate each new project proposal's potential effects in the context of the region's overall environmental, economic, and social "capacity budget." It could also evaluate project scenarios involving less development than the maximum "capacity budget" scenario. The state should work with affected communities and other interested parties to determine early research priorities for a cumulative impact assessment and to specify the information expected in project permit proposals." Upon further consultation related to this comment, a new action has been added to the Roadmap (Section 6.4.3.6) recommending that the state work with the federal government and Tribes to explore ways to conduct or support cultural resource inventories for submerged landscapes as an early action. The information gained from these surveys would inform siting and leasing activities for offshore wind energy or other offshore development in the future.
CTCLUSI	National Academies Report: The final Roadmap should incorporate information and finds from the National Academy of Sciences report, "Offshore Renewable Energy Development on the West Coast: Understanding Effects on Shipping, Fisheries, and Maritime Activities."	Information from the referenced National Academies of Sciences report will be added to the relevant offshore wind energy research in Appendix C (Research Framework).
CTCLUSI	Tribal Mitigation/Benefits Agreements: The Roadmap should recognize that, as sovereign nations, Tribes require a complete understanding of the impacts and benefits of a proposal prior to entering into any agreement that would limit their legal rights. Many developers attempt to "muzzle" Tribes and tribal concerns early in the approval process prior to analysis of impacts. The Roadmap should recognize that assessment of impacts and benefits and the identification of mitigation is a necessary pre-requisite to the development of Tribal Agreements.	Thank you for this additional detail. It has been added to Section 6.4.10 (Strategy: Tribal Mitigation Agreements).

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CTCLUSI	Specific Comments: • Page ES-2: Recommendation 6 should specifically include “funding” in addition to capacity and expertise. • Page 6: Do recent actions of the federal government impact the amount of offshore wind approved as described in paragraph 3? This should be revised if necessary. • Page 9: Paragraph 2 should specifically state that CTCLUSI filed suit to stop the lease sale. • Page 21: The Chart should indicate that cable landing and routing may require approval from the SHPO and could require federal approvals depending on the landing location and routing, (i.e. cross BLM lands will require federal approval). • Page 32: Section 3.2.2 should provide that studies and information should be gathered early in the process to better understand impacts as early as possible. • Page 33: Section 3.2.3 should identify the need for regional cumulative effects analysis. • Page 63-64: A goal of siting as described in Section 4.4.3.1 should be to seek consensus from stakeholder on project placement and/or identification of stakeholder concerns and ways to identify those concerns. • Page 77: Tribal monitoring during construction should be identified as a key action. • Page 112: The Tribe strongly supports Action 6.2.2.3. Offshore wind energy generated in Oregon should benefit Oregon’s coastal communities. • Page 123: If Oregon participates in the WCSC, the process should be open to include Oregon Tribe and other appropriate stakeholders. • Page 130: Section 6.4 should address environmental justice and measures to avoid disproportionate impacts of offshore wind development on Tribal communities. This could include disclosure of the identification of impacts to Tribal resources and identification of benefits to Tribal communities. • Page 158: Section 6.7 should include a priority for the recruitment of local workforce, including partnership with local Tribes for workforce development.	These specific recommendations have been implemented in the final Roadmap.

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Oregon Wild	General comment: We think the State of Oregon should proceed with great caution in development of offshore wind, because a clear-eyed review of available evidence, shows that offshore Oregon does not appear to be a good place for rapid development of wind energy. <i>[continues with specific example reasons, abbreviated to save space - refer to original comment]</i>	Thank you for your comment. The purpose of the Roadmap is not to determine whether or not the state should proceed with offshore wind energy development but rather defines standards to be considered in processes related to offshore wind energy development and approval. The Roadmap outlines both the potential opportunities and challenges of offshore wind energy and provides a framework for Oregon to consider its options. This framework includes policy and research recommendations, possible investments or actions the state can take, and process steps towards both responsible offshore wind energy development and alternative future scenarios. These include economic participation only or opting out entirely.
Oregon Wild	Floating Wind is an Immature Technology We are concerned that floating wind is an immature technology with high uncertainty and may not meet the Roadmap’s Guiding Principles and Objectives such as “achieving energy and climate objectives.” Most offshore wind deployed to date around the world is in shallow water and fixed to the ocean floor, not floating. Floating wind on the other hand is an immature and unproven technology. There are only a handful of large floating turbines deployed worldwide, so the technology has not been tested over the extreme range of conditions that are present off the Oregon Coast.	Section 6.2.3.1 (Action: State-led spatial planning inventory of marine and coastal zones to inform federal siting and Territorial Sea Plan updates) of the Roadmap recommends additional analysis of the costs and benefits of offshore wind energy relative to other renewable energy options, consistent with and expanding on the Oregon Energy Strategy (2025) developed by the Oregon Department of Energy. The purpose of the "achieving energy and climate goals" objective within the Roadmap derives from HB 4080 (2024), which DLCD has interpreted in the Roadmap to refer to standards and actions the state should pursue related to offshore wind energy development specifically. The Roadmap focuses on how offshore wind energy development should occur in a way to further these goals, rather than whether development should occur. At the same time, the Roadmap presents multiple alternative future paths - some with offshore wind energy development and some without - and recommends the additional analysis described above to inform future decision-making.

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Oregon Wild	Lack of Coherent Energy Policy We question whether investing scarce resources in floating wind will meet the Roadmap’s Guiding Principles and Objectives such as “achieving energy and climate objectives.” Decades of inaction on climate change has created a situation where we need to act quickly at scale. Floating wind will be expensive and time consuming, and divert scarce resources that could be better deployed to generate more power more quickly. Cost estimates for offshore floating wind indicate that this is a very expensive form of energy, relative to other renewable alternatives such as solar PV and on-shore wind. Keep in mind that monetary costs are roughly correlated with GHG emissions, which reinforces the point that floating offshore wind may not be the most effective way to address global climate change. In addition, meeting climate objectives via renewables is highly unlikely unless renewable energy development is firmly coupled to permanent reductions in fossil fuel use, which is not the case with #energydominance a focal part of the current administration’s energy policy. Renewable energy is great in many ways, but it does have ecological and economic trade-offs. It’s difficult to accept, but the combined effects of fossil fuels AND renewables maybe worse for the climate than fossil fuels alone. Oregon Wild supports taking aggressive action to address the climate crisis. We must rapidly decarbonize our energy systems which will involve large-scale development of renewable energies. However, among the wide range of renewable energy technologies available, offshore floating wind may not be the best solution. At the very least, it is premature to take significant steps to auction Oregon offshore areas for floating wind. Efforts to address climate change and decarbonize our energy sector would greatly benefit from adoption of a national energy policy that weighed options for renewables and set sensible priorities based on factors such as technology maturity/readiness, cost effectiveness, environmental footprint/trade-offs, deployment time, compatibility/conflict with other economic sectors, etc. A careful review of all these factors indicates that offshore floating wind may not	This comment was discussed at the May 2026 Offshore Wind Energy Roadmap Roundtable meeting. Participants agreed generally with the assessment that the state would benefit from a comprehensive energy strategy that evaluates a range of potential costs and benefits across multiple renewable energy options. While an attractive quality of offshore wind energy relative to other renewable energy options is the ability to deploy it at large scale, the comment's points are well-taken that the relative cost and time to deploy present challenges compared to land sources of renewable energy. However, it is also true that Oregon and the region are projected to need a significantly increased amount of electricity generation in the coming decades, and onshore sources may not be adequate or efficient alone. Options such as onshore wind, hydroelectric power, and solar face their own challenges related to land use, transmission access, water availability, and capacity factor, which may make offshore wind energy a valuable supplement in an "all of the above" approach to decarbonizing the regional energy system. Additionally, the potential economic opportunities associated with a new coastal industry on the west coast may bring co-benefits to the state beyond the cost of power. The Oregon Energy Strategy recognizes offshore wind energy as an emerging technology that may play a role in Oregon's energy future as it matures and if its development in the state may be accomplished responsibly. The Roadmap is intended to identify responsible paths to development for Oregon that are consistent with the policies and interests of the state and its communities, aligned with the objectives stated in House Bill 4080. The state can benefit from policy amendments, processes, and actions that would prepare Oregon for a potential future that includes offshore wind energy. Section 6.2.3 (Strategy: Improve Understanding of Offshore Wind’s Potential Benefits and Costs for Oregon to Clarify Investment Decisions) focuses on how the state can improve its understanding of offshore wind's potential benefits and costs for Oregon to clarify investment decisions. The recommended action in Section 6.2.3.1 (Action: Continue to refine the <i>Oregon Energy Strategy</i> to reflect changing conditions in offshore wind energy technology and the regional energy market) advises the state to continue to refine the

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	be a wise priority for addressing global climate change. Decisions on significant energy projects must be preceded by the development of a sound national energy policy. Oregon Wild recognizes the paramount need to avoid and mitigate global warming. We support the transition from fossil energy to renewable energy, but we insist that it be done in a thoughtful way. Lacking a coherent energy policy, the nation's current approach appears to simultaneously promote growth in fossil fuels and renewables. This will not address global warming and will increase the cumulative ecological impacts from renewable energy development, plus the already significant adverse impacts of fossil fuel use, including global warming. The goal must be to couple the development of renewable energy with absolute reductions in fossil energy use, so that GHG emissions are reduced in absolute terms, and so that the cumulative ecological footprint of the energy sector does not continue to increase. There are reasons to doubt our ability to transition away from fossil fuels, which raises questions whether renewable energy development is really a solution. See Jean-Baptiste Fressoz 2024. <i>More and More and More: An All-Consuming History of Energy</i>. Penguin Books. https://www.penguin.co.uk/books/464145/more-and-more-and-more-by-fressoz-jeanbaptiste/9780241718896. Current renewable energy investment approaches often assume that increased deployment of renewable energy naturally leads to less fossil fuel production. Findings by Thombs (2025) indicate that additional policies are needed to help reduce the use of fossil fuels. This study found no association between the production of renewable energy and fossil fuels, which suggests that creating renewable energy did not lower or replace the production of fossil fuels. The study found that more than 96% of the variation in fossil fuel production across the states was explained by fixed factors in each state, such as fossil fuel endowments — the amount of fossil fuel deposits available in each state. Thombs, R.P. Does renewable energy production displace fossil fuel production in the U.S.? A panel data study of fossil fuel-producing U.S. states, 1997–2020. <i>J Environ Stud Sci</i> (2025). https://doi.org/10.1007/s13412-025-01013-8. The advent of social media, blockchain technology, and large language models for	Oregon Energy Strategy, and the potential role of offshore wind energy specifically, to complete comparative cost-benefit analyses that support a coherent energy strategy.

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	artificial intelligence all add significantly to the demand for electricity, and make it that much more challenging to decarbonize our energy systems. New research now shows that alternative energy development is NOT displacing fossil fuels use, which raises a very serious question whether we should accept new impacts from alternative energy while policy-makers refuse to address the urgent need to curtail fossil energy use. The most effective strategy for curbing carbon emissions is likely to be one that aims to not only develop non-fossil energy sources, but also to find ways to alter political and economic contexts so that fossil-fuel energy is more easily displaced and to curtail the growth in energy consumption as much as possible.”)	
Oregon Wild	Ports and Estuaries The proposed call areas for offshore wind are located near Oregon ports that lack the facilities required to deploy and maintain a large array of offshore floating wind turbines. Developing large-scale offshore floating wind will therefore require building and significantly upgrading port facilities near the proposed call areas. This will have significant impacts on ecologically important Oregon bays and estuaries and the fish & wildlife that live there. The heavy use of existing ports by the offshore wind industry will also conflict with existing local industries, such as navigation, and the local sport and commercial fishing industry that could be displaced from traditional fishing areas. The ability of other port users to make timely bar crossings may be impeded by the movement of large, slow moving floating wind components. This is a potential public safety concern. The local benefits of offshore energy development may not manifest because Oregon lacks the required port infrastructure and developers may find that building offshore ports is cheaper and faster than investing in improvements onshore. Mathisen, G. 2026. Betting on floating ports - Building a port on land takes time. On water, the job can be done quickly. All these concerns bring into question the ability of offshore wind to meet the Roadmap’s Guiding Principles and Objectives including: “support communities” and “Support economic opportunity” and	The call areas identified by BOEM in 2024 were formally rescinded in 2025. The Roadmap did not assume a specific area or location where offshore wind energy might be sited in the future off the Oregon coast. Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) recommends a state-led marine and coastal spatial planning inventory process, which would identify areas in federal waters with resources or uses of high value that may conflict with future federal siting proposals. This would give the state the opportunity to influence and guide where offshore wind energy might be located in the future. The stated concerns around marine safety and port access are well-taken. One of the potential policy gaps identified in the Enforceable Policy Assessment in Section 5 (Enforceable Policy Assessment: Addressing Objectives and Seizing Opportunities) relates to marine safety effects and standards. The Roadmap did not consider offshore ports based on a lack of credible information about the feasibility and suitability of this alternative at this time, but any proposal to develop an offshore port would be subject to the enforceable policies of the state and relevant state authorizations.

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	“project the environment” (we assume this is a typographic error meant to say “protect the environment.”	
Oregon Wild	Transmission Lines and At-risk Species Generating more than de minimus amounts of offshore wind power will require construction of onshore transmission lines in the Oregon Coast Range to distribute the power to customers. Due to high rates of industrial clearcutting and the slow recovery of habitat on federal lands, the Coast Range is already beyond capacity with respect to forest clearing. This sill require clearing of habitat for numerous at-risk species, such as spotted owls, marbled murrelets, and pacific salmon. The impacts extend beyond the footprint of the vegetation clearing, because many forest species are sensitive to “edge effects” that expose them to predators and competitors, adverse modification of the microclimate provided by mature interior forests, and salmon are harmed by warming of streams, erosion from roads and clearing of right-of-ways, and reduced recruitment of instream wood. When wind turbines and/or powerlines are considered within the range of the marbled murrelet, please consider the recommendations of the Pacific Seabird Group Marbled Murrelet Technical Committee (PSG) which cite several examples of murrelets being killed by powerlines and note that murrelet habitat can be removed or degraded by powerline construction and maintenance. The PSG recommends burying powerlines in proximity to murrelet habitat, in order would provide the dual benefits of reducing collisions and reducing fire risk. PSG also recommends “terrestrial wind power projects not be located within or near murrelet terrestrial habitat or within or near flight corridors by which murrelets access their inland nest sites. If impacts cannot be avoided, they should be minimized and mitigated (e.g., protection of additional unimpacted terrestrial habitat through purchase or conservation easements).” Pacific Seabird Group Marbled Murrelet Technical Committee 2024. PSG Technical Publication Number 7: Terrestrial Habitat Management Recommendations for Marbled Murrelets. https://pacificseabirdgroup.org/wp-content/uploads/2024/02/Terrestrial-Habitat-Management-Recommendations-for-MAMU-2024.pdf. We are concerned that	Section 6.2.1.3 (Action: Support investments and planning for grid infrastructure upgrades to increase resilience and facilitate new energy options) echoes recommended actions from the 2025 Oregon Energy Strategy, including gathering and synthesizing technical information to inform state action on transmission and identifying potential priorities for development in new and existing transmission corridors. Additional language has been included to recognize the potential effects of transmission siting on species and habitats through land clearing and development in and across the Oregon Coast Range. Large transmission projects would be subject to federal consistency review if occurring within the state coastal zone (designated from 3 nautical miles offshore to the crest of the Coast Range), as well as other state and local policies related to habitat and wildlife protection. Large-scale transmission projects would also be under the review authority of the Energy Facility Siting Council.

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	transmission line construction may not meeting the Roadmap's Guiding Principles and Objectives to "protect the environment." Putting new transmission lines underground should be considered as an alternative.	
Oregon Wild	Anchor Cables and Marine Mammals The Roadmap's Guiding Principles and Objectives to "protect the environment" can't be met if whales, other marine mammals, turtles, and other wildlife collide with or become entangled in cables used to anchor floating wind platforms or cables used to move energy. From an energy standpoint, some of the best offshore wind energy potential off the coast of Oregon unfortunately overlaps with important whale migration routes and feeding areas and there is a serious risk that whales will become tangled in dense networks of anchor cables. Whales don't have reverse gear so when they get tangled in anchor cables they often twist which can exacerbate the situation, leading to drowning. ...As we learned with onshore wind energy, avoiding unacceptable wildlife conflicts depends a lot on choosing the right locations. Offshore Oregon is probably not one of the good places for wave energy. These conflicts need to be much more carefully investigated by scientists and discussed with the public before we embrace wave energy in this critical migration corridor. More than 10 years ago NOAA noted several concerns about marine mammal conflicts with wave energy [QUOTE]...	Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future. Additionally, the Roadmap recommends a state-led siting process that may address the interests reflected in your comment. Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) recommends a state-led marine and coastal spatial planning inventory process, which would identify areas in federal waters with resources or uses of high value that may conflict with future federal siting proposals. This would give the state the opportunity to influence and guide where offshore wind energy might be located in the future. Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) of the Roadmap includes a recommendation that the state amend the Territorial Sea Plan to require a cumulative impact assessment prior to offshore wind leasing, inclusive of considerations such as migratory corridors.

Name	Comments	DLCD Response
Oregon Wild	Turbines and Seabirds As with onshore wind, the spinning turbines pose a risk to birds and bring into question ability to achieve the Roadmap’s Guiding Principles and Objectives to “protect the environment.” Unfortunately, there is not enough information to fully evaluate the impacts. Birds and wildlife from all around the Pacific come to forage in Oregon’s rich upwelling waters. Birds deserve full consideration, including threatened and endangered species, and other vulnerable and sensitive birds. We are concerned about proposals to shift the call areas further west into deeper water because certain wildlife will likely face greater impacts, and deep water, farther offshore will increase costs of construction and operation/maintenance. Many seabirds live and forage mostly nearshore, so developing floating wind in deeper waters may seem appealing but there are at least 19 species of seabirds that have higher predicted densities in areas deeper than 1,300m in at least one season. Five of these species are considered “Birds of Conservation Concern” by the U.S. Fish & Wildlife Service. In addition, nearly 100 species birds migrate across the Pacific to forage in Oregon waters. These birds are likely to fly through floating offshore wind areas. ...Significant wind energy projects should also be informed by solid information on the environmental impacts, but scientists are just starting to engage is research on key questions relating to the impact of wind development on birds, bats, and other wildlife. [QUOTE]	Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future. Additionally, the Roadmap recommends a state-led siting process that may address the interests reflected in your comment. Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) recommends a state-led marine and coastal spatial planning inventory process, which would identify areas in federal waters with resources or uses of high value that may conflict with future federal siting proposals. This would give the state the opportunity to influence and guide where offshore wind energy might be located in the future. Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) of the Roadmap includes a recommendation that the state amend the Territorial Sea Plan to require a cumulative impact assessment prior to offshore wind leasing, inclusive of considerations such as effects to seabirds.
Oregon Wild	Other Wildlife Impacts The state should give attention to avoiding and minimizing impacts to other wildlife and their habitats, such as deep sea corals and sponges, reefs, rare and sensitive seafloor habitats, sea turtles, foraging hotspots for marine birds, marine mammals, and fish, including Essential Fish Habitat Conservation Areas (EFHCAs) and Habitat Areas of Particular Concern (HAPCs), rocky islands (many of which are wildlife refuges or federal wilderness areas), etc. Acoustic impacts on wildlife are an important consideration in development of offshore wind and onshore facilities.	Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) recommends a state-led marine and coastal spatial planning inventory process, which would identify areas in federal waters with resources or uses of high value that may conflict with future federal siting proposals. This would give the state the opportunity to influence and guide where offshore wind energy might be located in the future. Section 6.6.3.3 (Action: Amend state fishery use protection standards to apply more broadly to environment types rather than specific geographic areas) provides further recommendations to amend state fishery use protection standards to apply more broadly to environment types and has been revised to include examples of types of environments to consider for explicit protection, such as spawning

Name	Comments	DLCD Response
		and breeding habitat and benthic substrate critical to crab, shrimp, and groundfish species.
Oregon Wild	Land Use Consistency Offshore wind development activities (and associated onshore development activities) must be consistent with 1) Oregon’s Statewide Planning Goals; 2) Applicable acknowledged city or county comprehensive plan; and 3) Selected state authorities (e.g., water quality, archaeological resources, and fish & wildlife protections). Previous Coastal Zone consistency concurrences from DLCD are limited in scope, addressing only leasing activities and survey and site characterization activities. Actual development of offshore wind will require significantly more intensive scrutiny.	DLCD agrees with this comment. The 2024 BOEM leasing action review was limited to only the leasing activity itself and the subsequent characterization activities that would be conducted in support of a Construction and Operations Plan application. At that future time, a second state review would have evaluated the entirety of the project and would have had the ability to condition or object to the project based on its consistency with state enforceable policies and the attainment of all necessary local or state permits and authorizations. In 2024, the Oregon Coastal Management Program recognized that a conditional concurrence to leasing did not bind the future review decision or the state's ability to later object if the project proposed in the lease area could not be found consistent with enforceable policies.
Oregon Wild	Tribal Involvement/Cultural Resources We encourage agencies to work toward a meaningful harmonization of tribal interests and the interests of the public. Oregon Wild strongly supports tribal involvement in public land management, and the protection and restoration of fisheries, wildlife, native plants, wetlands, and clean water needed to sustain tribal treaty rights and interests. We also want to ensure continued public notice and public involvement, and fulfillment of conservation goals reflected in existing plans and policies. We hope the agency can identify the significant overlap among these diverse interests and manage accordingly. We hope that this Roadmap can enhance the cultural and environmental interests of native people, especially related to, cultural use of native fish & wildlife and cultural practices, especially in ancestral territories and usual and accustomed places. We hope there are opportunities for sharing and using traditional ecological knowledge (TEK) and we hope native people be involved in both planning and implementation of this Roadmap, where appropriate. We strongly support greater coordination and engagement between the state agencies and tribal governments and tribal members. We also feel the agencies need to ensure the general public is informed and understands the importance of this coordination, and that it is	Thank you for your comment. The Roadmap in Section 6.4 (Protect Tribal Cultural and Archaeological Resources, Culturally Significant Viewsheds, Subsistence Activities, and other Interests of Tribes) contains an extensive set of recommended actions and policies to support Tribal involvement in offshore wind energy decision-making, including the use of traditional knowledge, protection of data sovereignty, Tribal involvement in ground disturbing activities, Tribal policy coordination with similar state policies, and Tribal engagement with the state, federal agencies, and developers.

Name	Comments	DLCD Response
	happening. The general public is not always well informed about treaty rights or the importance of agencies engaging with tribes on resource planning and management, and failure to adequately inform the public can lead to unnecessary conflict. We urge that tribal consultation and application of TEK be done within a transparent framework, so that the general public can also be informed and involved in management of public resources.	
Oregon Wild	Alternatives The scope of analysis for the offshore wind roadmap needs to be carefully designed to explore alternative ways of producing renewable energy, alternative locations for offshore wind that might involve lower costs and fewer environmental trade-offs, and must describe the full environmental costs of offshore wind development, including required port developments and transmission lines. We appreciate that BOEM has excluded some important ecological areas from the offshore Oregon call area, however, the state should encourage BOEM to further adjust the boundaries of the proposed call areas to reduce expected impacts on fish, wildlife, navigation, and fishing activities. The 13.8-mile exclusion buffer from shore should be enlarged to protect known near-shore resources, and to account for uncertainties and reduce risks to under-studied near-shore resources. Sections on the eastern side of the call areas as currently drawn are hot spots for marine mammals, bird species, and turtles; shaving about 15 kilometers off the east side of the call areas would alleviate the worst impacts. Likewise, the northern portion of the Coos Bay call area overlaps with the Heceta Bank, one of the most productive areas for wildlife on the entire West Coast. These sections should be eliminated from the call areas.	The call areas identified by BOEM in 2024 were formally rescinded in 2025. The Roadmap did not assume a specific area or location where offshore wind energy might be sited in the future off the Oregon coast. Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) recommends a state-led marine and coastal spatial planning inventory process, which would identify areas in federal waters with resources or uses of high value that may conflict with future federal siting proposals. This would give the state the opportunity to influence and guide where offshore wind energy might be located in the future.
Oregon Wild	Mitigation We urge the state to develop a meaningful compensatory mitigation program to fully compensate for environmental harm to wildlife caused by the construction and ongoing maintenance of offshore wind facilities, including cable landing and port/terminal sites. A solid plan for decommissioning obsolete offshore wind infrastructure, and a bond to support that activity, must be part of the Roadmap.	Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) describes a framework for mitigation and adaptive management, which would be applicable to both offshore portions and onshore portions of an offshore wind energy project and associated development infrastructure.

Name	Comments	DLCD Response
ECONcrete	One proven approach is the use of bio-enhanced concrete, which has already been incorporated into federally permitted offshore wind projects such as the Sunrise Wind Project (Sunrise Wind – Appendix H-114: Mitigation and Monitoring). In that context, bio-enhancing admixtures and surface complexity have been recognized as compatible with federal standard construction practices while also supporting marine habitat formation and biodiversity. Unlike traditional materials, bio-enhanced concrete is specifically designed to promote biological recruitment, increase habitat complexity, and improve water quality at the material level. Importantly, it does so without altering project footprint, function, or permitting pathways. This makes it particularly well-suited for pilot projects, where innovation can be evaluated alongside performance, cost, and scalability. As Oregon moves forward, I encourage decision-makers to explicitly consider materials and design approaches that deliver ecological benefits alongside structural integrity. Pilot projects are not only about testing energy systems, but they are also an opportunity to define the standards that will shape the future of offshore infrastructure. By incorporating bio-enhanced concrete and similar innovations now, Oregon can ensure that its offshore wind industry is built on a foundation that is both resilient and ecologically responsible.	Thank you for your comment. The Roadmap does not recommend specific technologies or materials for use in offshore wind energy projects, focusing instead on standards, actions, and processes the state should use in future offshore wind energy decision-making. If a project were to be proposed and reviewed by the state in the future, the project's environmental effects would be evaluated against enforceable policies. Aspects of project design and material selection may be considered at that time, including mitigation options to minimize effects or improve ecological outcomes, which may include alternative materials.
The Nature Conservancy	Elevates specific points made in the joint letter from environmental NGOs	
The Nature Conservancy	Summary for Policymakers We appreciate the inclusion of the “Summary for Policy Makers.” It is essential for outlining clear, concise, and actionable steps for decision makers. The Summary for Policymakers seems to be used in lieu of a traditional Executive Summary. We suggest making the Summary for Policymakers an independent, complementary document and then develop a traditional Executive Summary that is inclusive of all audiences or let Section 1 serve as main entry for a reader to acclimate to the Roadmap. Additionally, due to the length of the Roadmap and its Appendices, we suggest the DLCD prepares supplemental documents, such as a factsheet and Frequently Asked Questions document, to accompany the Roadmap to increase accessibility.	A separate Executive Summary and Summary for Policymakers has been generated. The action recommendations in the summary for policymakers has been revised to add clarity on how the different lists relate to the Pathways, and a reference has been added to the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) where additional information about legislative action and funding needs can be found. The recommended addition to ES-8 (Participate in a regional offshore wind energy science collaborative) has been applied. Reference to Oregon's energy goals and Governor Kotek's 2025 Executive Orders have been added to the Summary for Policymakers.

Name	Comments	DLCD Response
	Additional points for consideration: • As written, the Summary for Policymakers contains three sets of recommendations. There is no information given about the distinction between the three sets of recommendations or how these lists are related to Section 6. It is unclear whether these are the top ranked priorities, whether they are subsets of Section 6, or simply illustrative examples. It would also be helpful to reference the Assessment of Recommended Roadmap Actions chart (6.8) to help policymakers identify what actions can utilize existing funding and staff and which actions may require additional funding. • On page ES-8 under the “No Offshore Wind Energy” pathway, the second bullet could mention that research will also help Oregon understand how OSW development in California, particularly near Humboldt, may be impacting Oregon’s resources. • We recommend highlighting for policy makers how the Roadmap aligns to other state initiatives including Governor Kotek’s Executive Orders 25-26 and 25-29 and the Governor’s Prosperity Roadmap. Currently, the synergy between these initiatives is not explained until Section 6.2 (page 109).	
The Nature Conservancy	Section 1 Roadmap Purpose and Introduction Section 1 of the Roadmap reads well and we appreciate the inclusion of Section 1.3 to help readers navigate the report. One small comment pertains to Figure 1.1. The report explains that there are four pathways, but Figure 1.1 depicts five. Providing an explanation about the cause for this discrepancy in the paragraph above or below Figure 1.1 would be helpful to the reader.	The Roadmap has been revised to clarify that there is a total of five pathways.

Name	Comments	DLCD Response
The Nature Conservancy	Section 2 Overview of Offshore Wind Energy Development The following feedback is related to Section 2. • The changing nature of OSW and the nation’s legal frameworks, including but not limited to the Endangered Species Act and National Environmental Policy Act, will unfortunately make aspects of this report rapidly outdated. We recommend that DLCD invest in updating the Roadmap to reflect such changes and to do so in alignment with updates to the State Energy Strategy. • In discussing potential revenue sources in Section 2.3.6, we want to draw your attention to Senate Bill 737 (2013) as a key addition to the Roadmap. The Outer Continental Shelf Lands Act (OCSLA), as amended by the Energy Policy Act of 2005, authorizes the collection and sharing of renewable energy development revenues. In anticipation of future renewable energy development off Oregon, in 2013, TNC worked with former Oregon Senator Roblan and others to enact Senate Bill 737. This bill authorized the creation of the Oregon Ocean Science Trust and established the Ocean Science Trust Fund. Under Section 3 of the bill, the Fund is authorized to receive the state’s distributive share of the amounts collected under the OCSLA to support ocean science and allocates 30% of the revenues to coastal counties to assist with costs and impacts associated with offshore development. The language was inspired by and mirrors California law. • Section 2.3.3. It may be worth mentioning that the PNNL studies imply trade-offs are possible and environmental benefits may accrue; however, these studies do not take into account data centers and/or energy demand outstripping supply and thus any forecasted environmental benefits may not come to fruition.	The suggestions have been applied in the Roadmap.

Name	Comments	DLCD Response
The Nature Conservancy	Section 3 Principles and Objectives for Offshore Wind Energy in Oregon The principles seem to be written with an eye towards the actions of government officials, but it may be worth noting that anyone engaged in the OSW industry from supply chains to workforce to developers could benefit from practicing the four principles. Collectively, these principles hint at the “Oregon Way” and outline general expectations of Oregonians. Section 3.2.2 Regionally Considered and Coordinated is relatively short in comparison to the other principles and therefore appears not as important as the other principles. We suggest referencing specific regional opportunities in the report, such as supply chain considerations, west wide regional initiatives, and regional transmission studies, such as the 10 year WestTEC transmission study and ODOE’s ongoing identification of transmission corridors, to flesh out this section.	Language has been added to Section 3.2 (Four Principles Guiding Roadmap Pathways) to expand the applicability of the principles beyond state government.
The Nature Conservancy	Section 4 Alternative Futures for Offshore Wind Energy in Oregon The explanations and graphics in Section 4 illustrate the Pathways and phases of OSW development, along with the accompanying discussions under each phase, are clear and effective. They provide a concise and accessible presentation of complex information for people with different ways of processing information and differing learning styles. Specific comments related to this section include: • Recommend text be added to orient the reader to how the Strategies and Actions in Section 4 are different, aligned with, or incorporated into the Recommended Roadmap Actions in Table 6.4 (page 160). • We appreciate the inclusion of a pilot-scale offshore wind Pathway in the Roadmap. Given that there are no floating turbines operating anywhere in the world at the depth or size of what was being proposed off Oregon, this Pathway offers an opportunity to test and learn from emerging technologies and components of potential development. Research leases and the Oregon State University’s PacWave project are excellent examples of how pilot-scale projects can gather information to assess potential commercial-scale effects and feasibility. • Clarify the reference to a senior state economic coordination	In response to this comment, the following edits were made to the Roadmap: - Language added to Section 4.1.1 (Alternative Futures and the Four Pathways) to connect the actions in the pathways with Section 6. - language added to Section 4.3.3.1 (Principles: Strategies and Actions for Economic Participation Only) to further describe the role of the senior state economic coordination official for developing offshore wind energy economic opportunities. - In Section 4.3.2 (Markers of Success and Considerations), the table has been amended to include state and local permits and authorizations in addition to enforceable policies. The language already describes mitigation consistent with policies, which includes the mitigation hierarchy. A separate reference was included in the "Protect cultural resources" row to involve Tribes in decision-making related to significant port development projects and their potential effects on cultural resources. - In the Summary for Policymakers, recommended action #1 already addresses the need for policy updates at the state or local level to be ready and influence the future of offshore wind energy. language has also been added to #6 to say, "Increase capacity funding and expertise

Name	Comments	DLCD Response
	official (see in Figure 4.4 under Meaningful Engagement in the green circle) by including additional information about the senior official or their role in Section 4.3.3.1. • Add language in Section 4.3.2, Table 4.4 noting that in addition to Enforceable Policies, regulations and permits should also apply if supply chain only projects require new onshore construction or port development. Similarly, it is worth noting in Section 4.4.1.2 that major port development must comply with regulations and permits, follow the mitigation hierarchy, and involve Tribes in decision-making for proposed changes that may fundamentally and permanently alter the estuary. • The bulleted list of actions in Section 4.4.3.1 represent near-term, no-regret actions. We appreciate that these are highlighted to Policymakers as key recommendations and would like to see explicit language added to #6 of the Key Recommendations for Policy Makers (page ES-2) clarifying that creating and updating enforceable policies is also a component of being ready for offshore wind development. • Suggest adding information in Section 4 to address and offer recommendations in the event of infrastructure failure and/or a catastrophic event.	within state agencies, local governments, and Tribal governments to be ready for offshore wind energy development, including capacity for plan and policy updates." - reference added to Section 4.4.3.3.2 (Objective: Strategies and Actions for the Permitting Phase) to address catastrophic event planning as part of the permitting phase.
The Nature Conservancy	Section 5 Enforceable Policy Assessment: Addressing Objectives and Seizing Opportunities Overall, we appreciate that recommendations within the Enforceable Policy Assessment will strengthen policies to protect the environment, wildlife, and existing ocean users. This information will be useful across all Pathways, including scenarios such as potential future offshore wind energy proposals led by the Bureau of Ocean Energy Management (BOEM) or an unsolicited lease request by a developer. The enforceable policies and gaps identified in this Section and in Appendix A present significant opportunities for Oregon to strengthen its regulatory framework and influence federal actions. Together, they outline potential updates to enforceable policies that would apply not only to offshore wind but also to any future offshore activities. Dedicating time and resources to modernize these policies would signal a proactive approach to addressing and meeting Oregonians' interests and priorities.	Language has been added to Section 5.2 (Identified Policy Gaps and Opportunities) to note that addressing enforceable policies will likely require amendments to the TSP and other policies, and the time and engagement effort and resources required. As part of the Roadmap development process, DLCD invited the nine federally recognized Tribes in Oregon to provide capacity need information to fully engage with offshore wind energy development processes. The Roadmap includes the information that was voluntarily provided.

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	At the same time, the Roadmap places substantial weight on enforceable policies as the primary avenue for raising concerns and influencing federal decisions. Relying so heavily on enforceable policies risks overlooking other mechanisms available to the state. For instance, additional permits or regulatory pathways may be triggered if an offshore wind array is proposed within state waters or if associated infrastructure crosses state jurisdiction. The Roadmap could benefit from adding a future action item to explore how non-enforceable policies might also be updated or strengthened to broaden Oregon’s influence. The report should also note that establishing new enforceable policies may require amendments to the Territorial Sea Plan, modifications to regulations, statewide land use goals, county plans, or new legislation as well as review and acceptance by the National Oceanic and Atmospheric Administration. These processes require time and resources to ensure proper public engagement and consideration. Further complicating matters is uncertainty at the federal level, where recent actions have raised questions about whether federal consistency and enforceable policies under the Coastal Zone Management Act will be upheld. Lastly, we appreciate the inclusion of the Capacity Assessment. Developing, updating, and implementing enforceable policies is only possible when state, local, and Tribal governments have the capacity to do so. The information provided by state agencies offers valuable insight into both current approaches and future needs. If feasible, comparable data from local and Tribal governments would further clarify the full landscape of capacity needs across jurisdictions. Without the funding for adequate capacity, Oregon will be limited in its ability to proactively update enforceable policies and fully leverage them to influence federal projects.	

Name	Comments	DLCD Response
The Nature Conservancy	Section 6 Recommended Strategies and Actions for the Seven Objectives Regarding 6.1 Effective and Meaningful Engagement with Affected Communities, we are happy to see funding public engagement activities across agencies as a priority investment and encourage agencies to work collaboratively on hosting engagement opportunities to ensure affected communities aren't receiving duplicative and/or excessive engagement requests. Similarly, we suggest DLCD work with relevant federal, state, and local agencies to identify overlap in permitting timelines and to streamline and/or combine public engagement processes, when possible, to reduce project timelines and stakeholder engagement fatigue.	The recommended action around combining engagement processes has been included as a specific action in Section 6.1 (Effective and Meaningful Engagement with Affected Communities).
The Nature Conservancy	We would like to emphasize the importance of regional planning and collaboration in meeting our state's clean energy goals and forecasted energy needs. To that point, many of the strategies identified under the Section 6.2 Achieve State Energy and Climate Objectives are important considerations that are currently being identified, scoped, and addressed in other state agency strategies and processes (e.g. Oregon State Energy Strategy and directives from the Governor's Executive Orders). We encourage DLCD to continue to work closely with ODOE, the Public Utility Commission (PUC), and the Governor's Office to identify opportunities to integrate relevant and timely OSW research questions into ODOE's Biennial Energy Report and updates of the Oregon Energy Strategy as well as coordinate state representation on various regional energy planning efforts to ensure that Oregon is proactively engaging in these ongoing conversations.	Thank you for your comment. DLCD agrees that interagency coordination around regional energy planning and collaboration is vitally important. The DLCD Offshore Wind Energy Roadmap Coordinator is a permanent position that would be able to represent the Roadmap recommendations in other state energy coordination discussions.

Name	Comments	DLCD Response
The Nature Conservancy	In Section 6.3, we agree that strong and enforceable state policies to backstop and maintain environmental standards is critical, particularly in the light of changing federal standards. At a minimum, any development should be consistent with enforceable policies, and the state should explore policies to incentivize developers take actions that exceed these standards. Examples may include identifying specific project criteria or environmental standards and the inclusion of ecological actions within community benefit agreements in exchange for a prioritized permitting pathway. In addition, we recognize that ODFW has extensive expertise in identifying and implementing mitigation strategies for terrestrial species impacted by onshore wind development but the Roadmap should consider additional funding to support staff capacity to adequately evaluate and monitor the mitigation needs for marine species and habitats related to offshore wind development.	The federal consistency permitting process and timelines are established in federal regulation, and there is not a feasible path toward a "prioritized pathway" to permitting. One way in which the Roadmap aims for greater efficiency in reviews is to promote early collaboration on scientific needs for the permit review, which can significantly decrease the potential that consistency reviews must be extended until the necessary data and information is available (as was the case with the Jordan Cove LNG project federal consistency review, which underwent multiple stay agreements). DLCD agrees that ODFW fulfills a critical technical support role in state reviews of potential marine energy projects. ODFW capacity needs were solicited as part of the Government Capacity Assessment and are included in the Roadmap, and the Roadmap's recommended actions include funding the necessary agency capacity consistent with the assessment.
The Nature Conservancy	We support the need for the development of an OSW research agenda and the funding for an Oregon OSW Science Collaborative to better understand the current and future implications of these projects. We recommend prioritizing investments for the research agenda and Oregon's OSW Science Collaborative as well as Oregon's engagement in the West Coast Science Collaborative. The West Coast Collaborative will provide a regional context for science issues within the broader California Current Large Marine Ecoregion and Oregon will need to have agency capacity to fully participate and be effective. This is especially important as the cumulative capacity of the California Current for OSW development is assessed, and the cumulative impacts are recognized in this dynamic ecosystem. In addition, we encourage the DLCD to align with existing state or cross-agency/cross-sector efforts (e.g. Oregon State Energy Strategy) to build synergies and efficiencies in identifying and answering research questions, incorporating Traditional Ecological Knowledge, and to ensure existing frameworks incorporate the needs of OSW.	DLCD agrees with this comment and believes it is already reflected in the Roadmap.

Name	Comments	DLCD Response
The Nature Conservancy	We are hoping to clarify whether Table 6-4 in Section 6.8 is intended to capture all actions identified throughout the report or only those included in Section 6. If feasible, it would be helpful to incorporate every action from the Roadmap into this table. The chart is an effective way to consolidate information that is currently dispersed across the document and gives readers a more complete view of the recommended actions. We also have two specific suggestions related to Table 6-4: • There are concerns that numbering the actions may imply a ranking or prioritization. One possible solution would be to shift from numbers to letters (e.g., A, B, C) to avoid the perception of a hierarchy. • Either within this table or in a separate section, could DLCD provide some indication of prioritization or sequencing among the recommendations? For example, are there “no-regret” actions that could begin immediately, such as research tasks? Are there low- or no-cost actions that could move forward without additional resources? Which actions require legislative direction, and which can be initiated by the agency (e.g., TSP updates)? A section outlining the preferred order of operations - and identifying actions that are related or dependent on one another - would help readers understand how implementation might realistically unfold.	The action table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been restructured in response to this and other similar comments that came from the May and June 2026 Offshore Wind Energy Roadmap Roundtable meetings.
The Nature Conservancy	Lastly, we appreciate the detailed strategies identified in Section 6.4. Protect Tribal Cultural and Archaeological Resources, Culturally Significant Viewsheds, Subsistence Activities, and other Interests of Tribes. There is value in building competency across agencies for consultation, outreach, and engagement approaches with Tribal partners. We recommend integrating guiding principles and practices from the Oregon State Energy Strategy’s feedback and themes from the nine Federally Recognized Tribes into the Roadmap and encourage DLCD to build upon the work of the Governor’s Tribal Consultation Task Force to develop consultation procedures that reflect each Tribe’s unique needs, establishes clear timelines, and protects sensitive information.	The introduction to Section 6.4 (Protect Tribal Cultural and Archaeological Resources, Culturally Significant Viewsheds, Subsistence Activities, and other Interests of Tribes) references the key findings of the Oregon Energy Strategy related to Tribal interests in energy development. The identified themes coincide well with the strategies and actions in the Roadmap. DLCD agrees with the suggestion to work with the Governor’s Tribal Consultation Task Force as the Roadmap moves toward implementation.

Name	Comments	DLCD Response
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Our organizations caution against treating all pathways as functionally equivalent or implying that any pathway carries neutral outcomes for Oregon’s energy system and climate trajectory. The Roadmap does not adequately articulate the consequences of selecting pathways that exclude offshore wind energy development, particularly with respect to the state’s ability to meet its statutory climate targets, maintain grid reliability under increasing load growth, and address escalating climate driven threats. In addition, the Roadmap does not fully identify the high-value, “no regrets” investments the state should be making now to proactively build data, reduce uncertainty, and enable informed decision-making across all pathways, even those that do not include development. Given the scale of Oregon’s projected emissions reduction gap (See TIGHGER 2.0 Project Draft Gap Measures and Scenarios18), the inclusion or exclusion of major zero-emissions resources like responsible offshore wind energy has serious implications for the pace and feasibility of the state’s clean energy transition.	The Summary for Policymakers includes a list of priority action recommendations, including those actions that apply to all pathways. The list of actions has been restructured to make this distinction clearer. The Roadmap emphasizes in multiple places the importance of the state meeting its energy and climate goals, and it describes how offshore wind energy could be a significant benefit in this regard. However, DLCD does not agree that the Roadmap has the ability to clearly describe what the consequences to the state would be if offshore wind energy is not developed. Not enough is known about other potential pathways for the state to meet its energy and climate goals, and the Oregon Energy Strategy includes pathways that do not rely on offshore wind energy. DLCD attempted to more clearly articulate the reliability and resilience costs to coastal communities from not having a coastal energy generation source, but unfortunately the data and analysis was not available. One of the actions in the Roadmap (Section 6.2.3.3, Evaluate energy infrastructure needs more holistically to determine what role offshore wind energy and other renewables can play in improving energy resilience and reliability action) recommends further analysis should be performed to more clearly identify and quantify the potential benefits of improved grid resilience and reliability. The analysis should include the full value of these benefits for lives, property, and community well-being as additional factors to consider in future energy policy, regulation, and investment decision-making.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen	Section 2: Core Principles for All Pathways Several foundational elements are critical to advancing a responsible, comprehensive, and effective clean energy future in Oregon, regardless of which pathway the state ultimately pursues. These principles should function as a structural backbone of the Roadmap and should be treated as minimum conditions for any scenario, not optional enhancements. We organize our interests into seven cross-cutting core principles: (1) Governance and Political Leadership, (2) Science and Ecosystem-Based Decision-Making, (3) Labor Standards, Workforce Development, and Just Transition, (4) Grid Reliability, Affordability, and Resilience, (5)	Responses are provided individually in subsequent rows.

Name	Comments	DLCD Response
Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Climate Accountability and Comparative Energy Analysis, (6) Equity, Community Leadership and Engagement, and Economic Transition, and (7) Tribal Sovereignty, Self-Determination, and Co-Governance. Without these foundational elements, even the most well-designed pathway will be unable to achieve durable, equitable, or climate-aligned outcomes.	
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	We strongly recommend that political leadership in Oregon proactively align with and leverage California’s offshore wind planning, science, and infrastructure investments by formalizing regional coordination on transmission, supply chain development, and research. This includes actively engaging in California-led efforts such as the West Coast Offshore Wind Science Collaborative, while identifying opportunities to integrate Oregon’s priorities into emerging regional frameworks.	Interstate coordination with California is addressed through the following Roadmap recommended actions: - Regional supply chain coordination (Section 6.6, Create Economic Opportunities and Sustain Local and Regional Economies) - West Coast Science Collaborative participation (Section 6.3, Protect the Environment and Species (Marine, Terrestrial, Estuarine, Freshwater)) - Regional transmission planning (Section 6.2, Achieve State Energy and Climate Policy Objectives) - Interstate leadership-level coordination on transboundary equity issues (Section 6.2, Achieve State Energy and Climate Policy Objectives)
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	We recommend that the Roadmap incorporate additional examples of potential policy and legislative actions the state could pursue—particularly under Pathways 2–4—modeled after California’s innovative offshore wind efforts. For example, California recently enacted Assembly Bill 1417, a first-of-its-kind offshore wind capacity bill designed to support and enhance community engagement in offshore wind planning. This and similar legislative efforts should be included in Table 5-1 as illustrative examples of state leadership that can help address gaps identified in the Roadmap. Highlighting these approaches would provide Oregon policymakers with a clearer suite of actionable options that have been successfully deployed in other states to advance offshore wind energy development while strengthening stakeholder engagement, environmental protections, and implementation capacity.	AB 1417 is specifically referenced in a new action within Section 6.1 (Effective and Meaningful Engagement with Affected Communities) and is included in the Enforceable Policy Analysis in Table 5-1 and Appendix A (Enforceable Policy Assessment).

Name	Comments	DLCD Response
Conservation Coalition)		
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Oregon’s political leaders should draw on these lessons by adopting a proactive approach to offshore wind development across Pathways 2-4 that combines durable policy commitments with strategic infrastructure and workforce investments. The Roadmap should more clearly articulate the role of formal legislative and procurement mechanisms in providing long-term market certainty, including legislatively backed procurement targets, coordinated port and supply chain investments, and structured procurement programs designed to ensure continuity and reduce investment risk.	The Section in 6.2 (Achieve State Energy and Climate Policy Objectives) focused on legislative and procurement mechanisms has been expanded to discuss potential pilot procurement policies. More details have also been added to Section 6.6.2 (Strategy: Identify Investment and Planning Needs) to reflect factors that influence state investment in port and supply chain infrastructure.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	As we expand upon in the next section, Oregon’s experience in the 2024 offshore wind leasing process and consistency review under CZMA demonstrated that early and coordinated state engagement can result in meaningful environmental protections. The Roadmap should more clearly articulate these successes and position proactive state action as a central strategy, not a secondary consideration.	A new Section, 2.4.3 (Federal Consistency and the 2024 BOEM Leasing Review), has been added to highlight the federal consistency review of the 2024 BOEM leasing review and the state's opportunity to influence decisions under its CZMA review authority. Language has also been added to the introduction of Section 6.3 (Protect the Environment and Species (Marine, Terrestrial, Estuarine, Freshwater))to emphasize that the state's federal consistency review authority is its clearest and strongest opportunity to influence, condition, or object to OSW project leases and permits.

Name	Comments	DLCD Response
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Procurement The Roadmap does not fully explore the action items necessary to deploy state-led procurement, instead identifying this as “beyond the scope” of the document. This creates a significant gap that not only fragments the pathway to implementing utility-scale offshore wind development, but also limits Oregon’s ability to secure enforceable commitments related to environmental protection, labor standards, workforce development, community benefits, and economic development outcomes. State-led procurement is one of the most powerful tools available to shape project outcomes, enabling the state to embed binding requirements directly into contracts, including provisions related to high-road labor standards, local hiring, supply chain participation, wildlife protections, habitat avoidance, community benefit agreements, and funding for research, monitoring, and adaptive management. Other states have successfully used procurement processes to prioritize projects with stronger overall performance across environmental, labor, and community criteria, while also requiring ongoing monitoring, regional coordination, and increased data transparency. Notably, nearly all U.S. states that have successfully advanced offshore wind have relied on centralized, state-led procurement frameworks, with Virginia standing as the primary exception through a legislatively directed, utility-led model. By not evaluating or outlining the actions for a procurement pathway, Oregon risks positioning itself outside of the dominant model that has enabled successful deployment in other states. State-led procurement also provides a mechanism to secure substantial, dedicated funding from developers for regional research, long-term environmental monitoring, and other investments. Oregon risks limiting its ability to shape project outcomes and capture long-term value. The Final Draft of the Roadmap should outline necessary steps to establish a procurement mechanism.	Additional information has been added to Section 6.2.2.2 (Action: Consider a policy that would require offshore wind energy in Oregon to connect to Oregon’s coastal grid) regarding pathways to a pilot state-led procurement program as an option to consider, including points made in this comment.

Name	Comments	DLCD Response
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Transmission Planning for transmission and onshore infrastructure must also be integrated earlier in the process. Deferring these considerations creates avoidable conflicts, increases costs, and limits the state’s ability to align offshore development with community and environmental priorities. This is particularly important given that transmission planning under the federal offshore wind process typically occurs late in project development and is largely driven by individual project proposals rather than coordinated regional planning. As a result, states that do not proactively engage in transmission planning risk missing opportunities to influence onshore landing points, grid integration pathways, and cumulative land-use impacts.	Section 6.2.2.1 (Action: Explore potential economic incentives, energy planning policies, procurement frameworks and authorities, or other amendments to Oregon energy policy that might attract and facilitate long lead-time resources, such as offshore wind energy) includes a recommendation that the state engage in proactive transmission planning. Clarification has been added that this recommendation applies under any pathway, not only those featuring full scale offshore wind energy development, and additional information has been added to emphasize the value of proactive regional transmission planning.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Port Infrastructure Port infrastructure should be treated as a core component of Oregon’s offshore wind strategy, rather than a downstream consideration. Across East Coast states, early, state-supported port planning has been essential to capturing economic benefits and enabling project deployment, and the same will be true across all Oregon Pathways. Even limited participation, such as operations and maintenance, will require targeted upgrades to accommodate large-scale components and floating foundations. At the same time, port development must be planned in tandem with environmental and community priorities, particularly given the ecological sensitivity and multiple uses of Oregon’s estuarine systems. This requires proactive state leadership to support coastal communities in updating estuary management plans, including through dedicated funding and technical assistance. For example, in Coos County, efforts to update the Coos Bay Estuary Management Plan have stalled since 2015 due to local capacity and funding constraints, highlighting the need for state intervention to ensure that port development decisions are grounded in current, comprehensive planning frameworks that balance ecological protection with long-term economic opportunity.	A new recommended action has been added to Section 6.3.3.2 (Action: Support capacity funding to update estuary management plans in local government comprehensive plans) related to providing capacity funding to local governments for estuary planning, with a specific mention of the Coos Bay Estuary Management Plan update process.

Name	Comments	DLCD Response
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Principle 2: Science and Ecosystem and Health-Based Decision-Making A central gap in the current Roadmap is the uneven application of science-based planning and environmental safeguards across Pathways. Regardless of whether Oregon pursues offshore wind development, the state’s coastal and marine ecosystems will continue to face increasing pressure from climate change, ocean use conflicts, and regional energy development.	DLCD agrees that addressing policy gaps regardless of the future of offshore wind energy can serve the state. In response to more specific comments below, the prioritization framework in the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been removed, and the planning and research actions are now included as recommended actions for all pathways in the Summary for Policymakers.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Embed Science and Environmental Safeguards Across All Pathways Robust, coordinated science is needed to support informed decision-making across all four Pathways. Certain investments in research and data collection advance Oregon’s precautionary approach to offshore wind development regardless of the state’s pursuit of offshore wind energy. We strongly urge DLCD to revise the Roadmap’s Key Recommendations and Actions to ensure that core science-based measures are incorporated across all Pathways (1–4). These include, but are not limited to, marine spatial planning; updates to the Territorial Sea Plan (TSP) and relevant Enforceable Policies; revisions to the Habitat Mitigation Policy (HMP); development of an Oregon Research Agenda; participation in the West Coast Science Collaborative; Health Impact Assessments; and consideration of a Net Positive Impacts framework. These foundational science investments are critical for understanding ocean and coastal habitat use, assessing cumulative impacts, protecting places of high importance and high conflict, and preparing the state to respond to changing ocean conditions driven by climate change and increasing energy and resource demand. These recommended actions also support broader ocean and coastal	The prioritization scheme in the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been removed in this revision of the Roadmap. As a result, there is not a distinction between those actions that would be of relative lesser or greater priority under pathways 1 and 2 vs. pathways 3 and 4. Language has been added to the specific actions referenced in the comment to emphasize that they have value under any pathway.

Name	Comments	DLCD Response
	management objectives beyond offshore wind, ensuring that Oregon is equipped with the data and tools necessary to make informed, science-based decisions under any future scenario. Embedding these investments across all Pathways will strengthen the state’s ability to respond to uncertainty, reduce long-term ecological risk, and align decision-making with both climate commitments and biodiversity goals.	
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Marine Spatial Planning (MSP) MSP provides a science-based, ecosystem-level framework to identify suitable areas for ocean uses while avoiding sensitive habitats and high-conflict zones. It is particularly advantageous to pursue large-scale MSP given that BOEM has indicated that it will consider and incorporate state-led planning efforts into siting and leasing decisions.³¹ Establishing a robust MSP framework in advance, positions Oregon to proactively shape federal actions in the seaspace, rather than reacting to them, especially amid broader federal shifts that may prioritize expanded offshore development with fewer environmental safeguards.³² By clearly identifying suitable areas, and high-conflict zones through a science-based, community-informed process, Oregon can exert meaningful influence over future federal activity and ensure alignment with state priorities. MSP is equally valuable under no offshore wind scenarios. Even in the absence of offshore wind, Oregon’s marine environment faces increasing pressures. MSP provides a comprehensive framework to manage these cumulative stressors, protect sensitive habitats and reduce user conflicts across sectors. For these reasons, we recommend that the TSP Parts 4 and 5 be amended after the state has conducted large-scale MSP to inform those amendments, and that the implementation of MSP be ranked a “medium” to “high” priority across all four Pathways.	This comment was further discussed with the commenter to clarify the intent. The timing of an MSP process should be integrated with any updates to the Territorial Sea Plan to ensure that planning inventories are based on the most up to date policies. Work on an MSP process may begin independently from formal rulemaking, including activities to gather relevant information, convene interested parties, and establish objectives and methods for the process. This clarification has been added to Section 6.3.2.1 (Action: State-led spatial planning inventory of marine and coastal zones to inform federal siting and Territorial Sea Plan updates).

Name	Comments	DLCD Response
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Enforceable Policies and the Territorial Sea Plan We strongly urge DLCD to address the gaps and revisions identified in the Enforceable Policies Assessment, to strengthen this powerful regulatory policy tool proactively. Enforceable Policies are a safeguard for the state to protect its resources and ensure that federal activities are aligned with Oregon’s coastal management priorities. Even within Pathway 1, federal ocean uses and other coastal development pressures will continue, requiring strong state enforceable policies to protect resources and guide consistency review. Again we recommend that the Roadmap elaborate on what the state was able to secure for environmental and wildlife protections during the initial Federal Consistency review due to its existing enforceable policies. Oregon has already demonstrated how effectively it can use its authority under the federal consistency review during the initial offshore wind planning process in 2024, ensuring that proposed projects align with the state’s coastal management priorities. While the overall process ultimately did not move forward, Oregon’s consistency review under the CZMA secured significant protections for state interests (see Lease OCS-P 0566 and 0567 Section Addendum C Section 6), showing that state-led review can achieve meaningful safeguards even before development begins as a condition of the lease. These conditions included pre-survey coordination with DLCD, monitoring reporting to DLCD, regional coordination among lessees, a required 250 foot buffer from hard structures such as rocky reef, and a 1000 foot anchoring buffer from sensitive habitats, among others.³³ The Roadmap has the opportunity at the outset to, and should, explicitly highlight these successes to demonstrate why actions within each pathway, such as enhancing its Enforceable Policies, are necessary and impactful.	Thank you for the suggestion. A new section has been added to the Roadmap (Section 2.4.3, State-led spatial planning inventory of marine and coastal zones to inform federal siting and Territorial Sea Plan updates) to demonstrate how the state's authority under the CZMA was used in the BOEM leasing decision.

Name	Comments	DLCD Response
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Habitat Mitigation Policy (HMP) Updating and fully resourcing the Oregon Department of Fish and Wildlife’s HMP will strengthen Oregon’s ability to classify, map, and protect sensitive habitats using a consistent, science-based framework. Integrating HMP classifications into coastal planning could enable DLCD to establish a basis for protecting important habitats centered around ODFW’s habitat classifications such as “essential” and “irreplaceable”. To be effective, the HMP should be fully resourced well in advance of development so that the classifications can direct siting decisions in any future development scenarios. They should therefore be embedded as core action items across all four Pathways.	The enforceable policies of the coastal management program contain a version of the mitigation hierarchy within Territorial Sea Plan (TSP) Parts Four and Five, which would implement Goal 19: Ocean Resources for portions of an offshore wind energy project in the ocean. Effects to estuaries, rivers, or upland environments are addressed by the Habitat Mitigation Policy. In response to this comment, an entry has been added to the Enforceable Policy Assessment list of potential gaps, recommending that the TSP be amended to incorporate concepts, terms, or methods in the HMP that are applicable or appropriate to ocean environments. The TSP should also establish a consistent method for identifying important marine habitats for which different standards apply. The purpose of this review would be to maximize protection of sensitive habitats using the strengths of both policies. The gap assessment also recommends that guidance be created to assess and recommend potential tools available to mitigate marine habitat effects, which could assist in the implementation of mitigation through the TSP in future reviews.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	West Coast Science Collaborative (WCSC) Participation Even if Oregon pursues either of the Pathways without offshore wind energy development (1 or 2), its coastal neighbors have, and may continue to pursue this development. Given the ecological interconnectedness of the West Coast, particularly the California Current Marine Ecosystem (CCME), which spans the entire Oregon coastline, along with shared marine resources, ongoing uncertainties about impacts, and limitations in research funding and capacity, it is prudent for Oregon to participate fully in the West Coast Science Collaborative (WCSC) across all four Pathways. Participation will enable regional coordination, data sharing, and alignment of research methodologies, and early engagement ensures that Oregon can both contribute to and benefit from shared scientific knowledge. This engagement will improve the interoperability of data used in decision-making and will help ensure that Oregon plays a key role in research and monitoring related decisions that impact shared coastlines. The Collaborative has allocated an ex-officio Steering Committee seat to DLCD within its Draft Blueprint, recently published for public comment.	The prioritization scheme in the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been removed in this revision of the Roadmap. As a result, there is not a distinction between those actions that would be of relative lesser or greater priority under pathways 1 and 2 vs. pathways 3 and 4. Nevertheless, DLCD agrees with this comment that participation in the West Coast Science Collaborative, once it is active, should be a high priority under all alternative futures. In Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk), the Roadmap already recommends the establishment of a mechanism to provide funding for engagement in science collaboration and pursuit of an Oregon offshore wind energy research agenda. Further refinement has been added by splitting this action into two separate actions: participation in a regional science entity and creation of an Oregon-specific science collaborative. This is intended to emphasize the importance of each action individually as independent recommendations.

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	DLCD should take full advantage of this position, even in Pathway 1. DLCD should establish a mechanism to ensure its participation is representative of Oregonians and that the information gathered within this body is shared broadly to inform Oregon. Engagement in regional science coordination ensures access to shared data, alignment of methodologies, and a meaningful role in shaping research priorities. To support participation in the WCSC, the state should also ensure that agencies—and affiliated institutions such as the Oregon Ocean Science Trust—are authorized to receive and deploy funding from sources outside the state legislature for the purpose of engaging in the WCSC. Given the likelihood of limited state funding for this effort, enabling access to external funding sources will be critical to ensuring Oregon’s meaningful and sustained participation.	
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Health Impact Assessments (HIA) Renewable energy delivers important public health benefits, including cleaner air, reduced greenhouse gas emissions, and decreased reliance on fossil fuels. At the same time, it remains a form of industrial development that can introduce new sources of pollution and community stress. These impacts may compound existing social and environmental health risks, particularly for frontline communities. Applying a Health Impact Assessment (HIA) approach across all Pathways creates a meaningful opportunity for local residents to inform development, while providing decision-makers with the evidence needed to ensure offshore wind industry cluster projects are designed and implemented to protect and promote community health.	The action in Section 6.5.1.6 (Action: Obtain information about potential community effects to support community agreement negotiations) has been modified to include a reference to Health Impact Assessments as follows: "Offshore wind energy development carries distinct implications for impacts to existing industries such as fishing and tourism, changes in energy affordability and reliability, public health, and access to economic opportunities associated with new development. For communities to meaningfully participate in community agreement discussions, they must understand both the needs of their community and the potential ways in which offshore wind development would affect community values and interests. These two inputs together can allow communities, developers, and the state to better understand and measure whether or how community agreements would sufficiently mitigate effects to be found consistent with a recommended community well-being policy (discussed previously in the Roadmap). One potential approach to measuring community effects could be to use a modified Health Impact Assessments approach to include both health-based and other factors such as economic, cultural, infrastructure, or service effects."

Name	Comments	DLCD Response
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Net Positive Impacts (NPI) Adopting a Net Positive Impact (NPI) approach across all Pathways would shift decision-making beyond No Net Loss, the current framework used in the U.S., toward achieving measurable ecological improvements to baseline conditions. This framework better reflects the realities of the climate and biodiversity crises by ensuring that development contributes to long-term ecosystem resilience rather than maintaining a declining baseline. When applied to the No Offshore Wind Pathway, an NPI approach would still drive proactive restoration, habitat enhancement, and conservation investments to address ongoing ecosystem degradation and cumulative stressors, ensuring that inaction does not result in continued ecological decline. We strongly advise the Roadmap review and consider the work already being conducted to apply NPI to offshore wind energy development.³⁴	The NPI approach has been added to the Enforceable Policy Assessment in Appendix A (Table A-4) and the gap summary table in Section 5 (Table 5-1) as a policy recommendation for consideration in future rulemaking.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Comprehensive Comparative Analysis of Renewable Energy Alternatives We support Key Recommendation for Policymakers 10 and emphasize that a comparative analysis of renewable energy options should be conducted across all Pathways. This analysis should extend beyond cost and near-term performance to incorporate life cycle assessments, long term climate projections, biodiversity loss considerations, and cumulative environmental stressors. Without these factors, decision-making risks favoring options that appear beneficial in the short term, but result in greater long-term ecological harm.	Section 6.2.3.1 (Action: Continue to refine the <i>Oregon Energy Strategy</i> to reflect changing conditions in offshore wind energy technology and the regional energy market) of the Roadmap recommends additional analysis of the costs and benefits of offshore wind energy relative to other renewable energy options, consistent with and expanding on the Oregon Energy Strategy (2025) developed by the Oregon Department of Energy. Additional language has been added to the recommended action in Section 6.2.3.1 to provide further guidance on the nature of a cost-benefit analysis that is recommended for inclusion in future revisions to the Oregon Energy Strategy.

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Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Principle 3: Labor Standards, Workforce Development, and Just Transition A successful clean energy transition in Oregon depends on the creation of high-quality, family-sustaining jobs and the development of a skilled, durable workforce. Across all pathways, labor considerations must be treated as a foundational component of energy planning rather than a downstream benefit of project development. Offshore wind and broader clean energy investments have the potential to generate significant employment opportunities across construction, operations, and maintenance, manufacturing, port development, and supporting supply chain industries. However, realizing this potential requires early and intentional policy alignment to ensure that economic benefits are both accessible and equitable distributed.	Section 6.7 (Create an Offshore Wind Energy Workforce that Is Local, Housed, Trained, and Equitable) has been significantly expanded and revised based on additional feedback received from public comments.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	High-Road Labor Standards All pathways should prioritize strong labor standards, including: Project labor agreements (PLAs) consistent with HB 4080, prevailing wage requirements and labor protections, strong health and safety standards for offshore and port-based work, and mechanisms to prevent labor exploitation in supply chain development. These standards are essential to ensuring that clean energy development does not replicate inequities seen in other large-scale infrastructure sectors in Oregon.	Section 6.7 (Create an Offshore Wind Energy Workforce that Is Local, Housed, Trained, and Equitable) has been significantly expanded and revised based on additional feedback received from public comments.

Name	Comments	DLCD Response
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Workforce Development and Training Infrastructure A coordinated statewide workforce strategy is necessary to prepare Oregon workers for emerging offshore wind and clean energy roles. This includes: Expansion of apprenticeship and pre-apprenticeship programs, partnerships with unions, community colleges, and workforce boards, targeted investment in coastal and rural workforce development, and training pathways aligned with port development, maritime operations, and technical maintenance roles. Early workforce investment is particularly important given the specialized nature of offshore wind supply chains and the need for regionally competitive labor capacity.	Section 6.7 (Create an Offshore Wind Energy Workforce that Is Local, Housed, Trained, and Equitable) has been significantly expanded and revised based on additional feedback received from public comments.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Regional Equity and Access to Opportunity Labor benefits must be distributed across regions, with intentional focus on coastal and rural communities that are most directly affected by infrastructure development and energy system changes. Workforce development should prioritize equitable access to training, hiring, and long-term employment opportunities.	Section 6.7 (Create an Offshore Wind Energy Workforce that Is Local, Housed, Trained, and Equitable) has been significantly expanded and revised based on additional feedback received from public comments.

Name	Comments	DLCD Response
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Labor as a Core Component of Planning, Not Implementation Labor considerations should not be limited to project permitting or procurement stages. We appreciate that workforce planning, labor standards, and training investments are integrated into the Roadmap itself as foundational elements that shape how each Pathway is evaluated and implemented.	Section 6.7 (Create an Offshore Wind Energy Workforce that Is Local, Housed, Trained, and Equitable) has been significantly expanded and revised based on additional feedback received from public comments.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Principle 4: Grid Reliability, Affordability, and Resilience A reliable, affordable, and resilient electric grid is foundational to the success of Oregon’s energy future across all pathways. As electricity demand continues to grow—driven by electrification, population growth, and industrial load increases—grid planning must proactively ensure system adequacy under both routine and extreme conditions. Key priorities must include, (1) Modernization of aging infrastructure, (2) expansion and strategic siting of transmission capacity, (3) improved integration of diverse renewable resources, (4) protection of ratepayers through long-term cost planning, and (5) strengthening system resilience during wildfire, heat, and drought events. Grid investments must also prioritize equity and regional balance, ensuring that rural and coastal communities—particularly those historically underserved—are not disproportionately burdened or left behind in system upgrades. We recommend that the Roadmap evaluate all pathways, including no-development scenarios, using an integrated grid planning lens that assesses reliability, affordability, and resilience under projected demand growth.	Section 6.2.1.3 (Action: Support investments and planning for grid infrastructure upgrades to increase resilience and facilitate new energy options) has been expanded to include points made in this comment.

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Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Principle 5: Equity, Community Leadership and Engagement, and Economic Transition Meaningful, sustained, and inclusive engagement and opportunities for leadership are necessary to ensure that energy planning reflects the needs and priorities of Oregon’s communities. Statewide Planning Goal 1 establishes clear expectations for public involvement, including: widespread opportunities for participation, two-way communication, involvement across all phases of planning, accessible technical information, responsive feedback mechanisms, and adequate support for participation.³⁵ These principles should be treated throughout the Roadmap explicitly as minimum standards for offshore wind energy planning and implementation, and not procedural requirements alone.	Thank you for your comment. Meaningful Engagement is included as one of the four guiding principles of the Roadmap, with a reference to Statewide Planning Goal 1 and an emphasis on embodying this principle as a requirement at every phase of offshore wind energy development. Additional action is also recommended in Section 6.1 (Effective and Meaningful Engagement with Affected Communities) to further support capacity for community engagement throughout the process.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Trust-Based, Leadership Engagement and Community Partnerships A key step toward meaningful engagement is building durable relationships and partnerships with trusted community organizations, local leaders, and Tribes. These partners often understand local dynamics, communication barriers, and historical context in ways that can improve effectiveness and credibility of engagement processes and lead to more successful and sustainable projects. Along the Oregon Coast, many communities are rooted in generations of place-based knowledge and livelihoods tied to fisheries, tourism, and the natural environment. These dynamics underscore the need for engagement approaches that are locally grounded, adaptive, and attentive to diverse perspectives. Projects are unlikely to succeed without local community leadership and robust networks of support, as these ensure development reflects community priorities, builds trust, and can be sustained over time. To be effective, these relationships must be long-lasting and not extractive in nature. Engagement should not be treated as a “check-the-box” exercise, but instead should be intentional, iterative, and backed by visible follow-through. Community priorities and concerns must be meaningfully incorporated into decision-making processes, with clear feedback loops that show how	A new action has been added as Section 6.1.1 (Action: Create a Community Engagement Support Fund) in response to the recommendation in this comment.

Name	Comments	DLCD Response
	local needs and interests are incorporated into planning, implementation, and design. Past experiences with large-scale development proposals have contributed to understandable skepticism in some communities. Offshore wind planning will therefore require a deliberate and transparent approach that supports meaningful community engagement alongside existing planning and regulatory timelines, ensuring that communities have the time, information, and resources needed to participate effectively and inform decision-making. Early and ongoing coordination with local governments, along with meaningful, government-to-government consultation with Tribal Nations, is essential to ensure offshore wind projects are fully integrated into local land use and general plans. This approach strengthens alignment with existing and planned development, reduces conflict, and ensures projects advance in ways that respect community priorities, Tribal sovereignty and expertise, and long-term regional goals. Capacity building is a critical component of this approach. This may include funding and resources for community-based organizations and local departments and agencies, support for local leaders, educational tools, meeting facilitation resources, and basic logistical support such as transportation for public meetings. These investments strengthen long-term civic participation, improve the quality of engagement, and contribute to strong and aligned local and Tribal government partnerships.	

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Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Accessible, Transparent, and Responsive Engagement Practices Effective engagement should include: Hosting meetings at accessible locations and times that reflect community needs, creating space to hear lived experience and community stories, not only technical accessible educational materials, including workshops, visual tools, and plain-language summaries, and identifying knowledge gaps transparently and outlining pathways for further research or clarification. Educational programming should be ongoing to ensure accurate information is widely available and to help reduce the spread of misinformation in communities. Local steering committees should be established and supported to foster communication with state and federal agencies and representatives, and to ensure there are local entities continuing to prioritize the needs and interests of local communities in local, state and federal planning processes, construction, operations, adaptive management, and decommissioning.	These specific recommendations have been incorporated into Section 6.1 (Effective and Meaningful Engagement with Affected Communities).
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Integrate Equity and Community Impacts Across All Pathways Equity and community considerations are not confined to any single Pathway and should be treated as central evaluation criteria across the entire Roadmap. Each Pathway carries distinct implications for impacts to existing industries such as fishing and tourism, changes in energy affordability and reliability, public health, and access to economic opportunities associated with new development. The Roadmap should require a more explicit and consistent assessment of: (1) Community-level economic and social impacts, (2) distribution of benefits and burdens, (3) energy affordability and resilience outcomes, and (4) risks of displacing impacts to other regions. Community leadership and engagement must also be sustained, well-resourced, and integrated into decision-making processes, not treated as a one-time input. This includes building long-term partnerships with trusted local organizations, coordinating and collaborating with local government, supporting capacity for participation, and ensuring transparency in how input is incorporated into outcomes.	The factors described in this comment have been added to a new action in Section 6.5.1.6 (Action: Obtain information about potential community effects to support community agreement negotiations).

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Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Community Benefit Agreements Community Benefit Agreements (CBAs) can serve as effective tools to formalize commitments between developers and impacted communities. CBAs should be co-developed with community partners and designed to ensure outcomes that are enforceable, transparent, and measurable. Community-based organizations are often best positioned to support this process, particularly when provided with adequate resources and capacity support. CBAs are most effective when negotiated and implemented in concert with protections and benefits being woven into planning processes, project design, policy, project labor agreements, lease agreements, development agreements, funding requirements, and other legally binding and enforceable mechanisms. Oregon can play an important facilitating role by developing toolkits and guidance informed by national best practices and emerging research on equitable design and implementation through a suite of agreements and policies.³⁶ Finally, the Roadmap should more clearly articulate how each Pathway supports, or fails to support, a just economic transition. This includes alignment with high-road labor standards, local hiring, workforce development, public health protections, and the creation of durable, family-wage jobs. A just transition framework for offshore wind and broader energy development in Oregon should ensure that energy resilience and affordability are strengthened, not undermined, particularly for coastal communities facing high energy burdens and increasing exposure to climate-related disruptions such as wildfire, storms, and drought. Energy planning should explicitly prioritize ratepayer protections and long-term affordability while ensuring that infrastructure investments improve local reliability. The Roadmap should also recognize that regional coordination—such as potential access to clean energy resources developed in neighboring states—may influence outcomes for vulnerable communities and should be considered as part of a broader equity and system planning lens.	Emphasis on prioritizing ratepayer protections, long-term affordability, and local reliability have been added to the description of the action in Section 6.2.1.1 (Action: Pursue regional power market opportunities and transmission planning related to offshore wind energy). The actions recommended in the Roadmap are intended to meet the objectives of HB 4080, which conceptually support a just economic transition through the protection of local communities and the creation of an offshore wind energy workforce that is trained, housed, and equitable. While the pathway descriptions in Section 4 (Alternative Futures for Offshore Wind Energy in Oregon) include benefits and considerations, the section does not directly compare the pathways for their relative effectiveness at meeting Roadmap objectives.

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Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Environmental Justice Energy planning must not replicate the harms historically associated with fossil fuel infrastructure development. A just transition requires that local priorities guide outcomes, particularly for environmental justice and frontline communities. Energy planning must explicitly address environmental justice concerns and ensure that benefits and burdens are equitably distributed. Tools such as Oregon’s Environmental Justice Mapping Tool (HB 4077)³⁷ should be integrated into planning processes to identify and support historically underserved communities. HB 4077 defines environmental justice communities as including communities of color, low-income communities, Tribal communities, rural and remote communities, coastal communities, and other populations experiencing health inequities or limited infrastructure, including youth, seniors, and persons with disabilities.³⁸ Oregon has an increased responsibility to advance environmental justice considerations in light of the federal government’s effective rejection of environmental justice as a guiding policy framework and its rollback of associated protections and commitments. In addition, climate action must proceed without replicating the extractive and inequitable patterns of the fossil fuel system. Oregon is already experiencing significant climate impacts, including wildfires, flooding, extreme heat, and ocean acidification. While transitioning away from fossil fuels is essential, renewable energy development must be designed to avoid repeating past harms to communities. Oregon has an important opportunity to lead by requiring offshore wind related projects use the best available technology to achieve net-zero emissions and reduce health burdens of host community port, manufacturing, and transportation hubs. Further, impacts to local public health must be thoroughly assessed, avoided, mitigated, monitored, and adaptively managed over time. Offshore wind development should not be used to justify expansion of fossil fuel-based or inefficient energy pathways. Hydrogen production, in particular, is often fossil fuel-dependent and can involve significant energy losses even when paired with renewable generation. As such, electricity generated from offshore wind should prioritize	Environmental Justice and frontline communities have been included in the discussion of how communities are defined for purposes of community agreements in Section 6.5.3.1 (Action: Promote enforceability and accountability for community agreements). DLCD carefully considered the suggestion related to prioritizing the use of offshore wind energy for community electricity as opposed to other uses such as hydrogen fuel production, data centers, or other industrial purposes. DLCD determined that any policy recommendations to implement this suggestion would be unlikely to be approvable by NOAA as enforceable policies because they would be considered discriminatory against particular uses or users. Furthermore, no similar policies exist statewide to direct how other sources of renewable energy such as solar, hydroelectric power, or onshore wind may or may not be used by certain types of power purchasers. If such policies existed, they would functionally be controlling power demand rather than supply and would have significant effects on the types of industries available to the state in the future. While the value inherent in this suggestion and other similar suggestions is valid, it was determined to be beyond the scope of the Roadmap and was not included.

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	direct community benefit and grid decarbonization rather than diversion into inefficient or emissions-intensive hydrogen production pathways.	
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Equitable Economic Development An equitable energy transition in Oregon must specifically account for the significant supply chain and workforce implications associated with offshore wind development. The scale of opportunity is directly tied to the level of state commitment, and Oregon’s ability to coordinate and collaborate at the local level. A pathway that supports utility-scale deployment, on the order of 3 GW of floating offshore wind in federal waters, would create the conditions necessary to attract a wide range of supply chain investments, including manufacturing, staging, operations and maintenance, and supporting services. By contrast, if Oregon chooses not to pursue offshore wind development as a core component of its energy portfolio, the state will still need to make substantial and proactive investments to attract and retain participation in lower-tier supply chain segments (e.g., Tier 2-4 components), or risk ceding these economic opportunities to other regions. The Roadmap should more clearly reflect the level of coordinated state action required to realize these benefits. Experience from the East Coast states demonstrates that supply chain growth did not occur passively, but was driven by deliberate policy choices, including state-led procurement, targeted infrastructure investment, coordination and collaboration with local communities and governments, and clear market signals to the industry. These states embedded supply chain requirements into procurement processes and aligned them with federal leasing structures, resulting in tens of billions of dollars in investment, extensive contracting across multiple states, and the rapid development of a skilled domestic workforce. Oregon’s current framing risks underestimating the degree of state engagement necessary to achieve similar outcomes. Port infrastructure will be a particularly critical factor in determining Oregon’s role in the offshore wind economy. Even under a limited or “economic participation only” pathway, many supply chain and	This comment was discussed during the Offshore Wind Energy Roadmap Roundtable meeting in May 2026. As a result of the conversation, the description of Pathway 2 (Section 4.3, Economic Participation Only) was revised to include the potential for large-scale port development to support a wider array of offshore wind energy support services to other states.

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	operations functions, especially those related to floating turbine assembly and long-term maintenance, require access to ports capable of handling large-scale components and heavy-lift operations. This implies that significant upgrades to existing facilities, such as those in Coos Bay, may be necessary even to support out-of-state projects, including potential development off the coasts of neighboring states. As a result, decisions about port investment should be evaluated not only in the context of in-state generation, but also in terms of Oregon's potential role in a broader West Coast offshore wind network. Ultimately, Oregon's ability to capture supply chain and workforce benefits will depend on whether the state provides clear, durable signals about its long-term role in the offshore wind industry. A proactive approach—grounded in coordinated planning, infrastructure investment, workforce development, and equitable access to opportunity—can position Oregon to support high-quality jobs and regional economic growth. Conversely, a more limited or uncertain approach may constrain the state's ability to compete for investment and reduce the extent to which local communities benefit from the emerging offshore wind economy.	
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Principle 6: Climate Accountability and Comparative Energy Analysis The climate crisis should be better emphasized within the introduction and across all Pathways, as addressing this threat is a core purpose of the state considering offshore wind energy development. The document currently lacks a grounding in the scientific consensus that there is no solution to the climate crisis without offshore wind energy, and no legitimate international or national climate bodies exclude this technology. Further, the Roadmap should explicitly articulate as a consideration how the selection of each Pathway impacts state, national, and international climate goals. This analysis supports the core principle of the Roadmap, to be “holistic and accountable”. The Roadmap does not fully articulate the climate and energy system implications of each pathway. A “no development” or “economic participation only” approach should not be treated as neutral options; both carry significant consequences for Oregon's ability to meet its clean energy	The Roadmap is not intended to be an analysis of energy alternatives for purposes of decision-making, and it is not a vehicle to compare OSW against other technologies or assume what other technologies the state uses to meet its energy needs in the absence of OSW development. For those pathways that do not include offshore wind energy for Oregon, the "Considerations" table identifies that other renewable energy sources would need to be developed instead to meet the state's energy and climate goals. A new introduction has been included in Section 2 (Overview of Offshore Wind Energy Development) that discusses climate change, international studies of the renewable energy transition, and the potential role of offshore wind energy to meet global energy targets.

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	goals and contribute to broader decarbonization efforts. The analysis should explicitly evaluate how each Pathway affects: (1) State and regional greenhouse gas reduction targets, (2) long-term energy reliability and resource adequacy, (3) exposure to fossil fuel price volatility, and (4) the geographic distribution of environmental and community health impacts. Similarly, the Roadmap should also explicitly consider how decisions made under Pathways 1 and 2 may shift the burden of energy production and generation, and associated environmental and climate impacts, onto other states or regions. A truly holistic and accountable framework must evaluate not only in-state outcomes, but also the broader regional implications of Oregon’s decisions. At the same time, higher-development pathways should be recognized for their potential to deliver significant clean energy capacity, improve grid reliability, and support emerging demand such as data center load growth. These system-level benefits should be more clearly and consistently integrated into a comparative analysis.	
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Principle 7: Tribal Sovereignty, Self-Determination, and Co-Governance Respect for Tribal sovereignty must be upheld and prioritized across all coastal and ocean planning processes. This requires more than timely and meaningful engagement; it necessitates a framework grounded in government-to-government relationships, recognition of Tribal authority, and a commitment to co-governance throughout the lifecycle of offshore wind development. Early-stage assessments are essential to this approach. The State of Oregon should conduct comprehensive, cumulative assessments prior to leasing decisions to evaluate potential environmental, cultural, and community impacts. These early evaluations are critical to informing Tribal mitigation and benefit agreement discussions and ensuring that Tribes are not placed in a reactive position after key decisions have already been made. To support consistent and respectful engagement, Oregon should establish a clear consultation framework designed to build consensus with Tribal governments. Developers must be required to follow this framework from the earliest stages of project planning, including participation in ongoing assessments and opportunities for Tribal co-monitoring. This approach helps ensure that Tribal knowledge,	Thank you for your comment. The Roadmap in Section 6.4 (Protect Tribal Cultural and Archaeological Resources, Culturally Significant Viewsheds, Subsistence Activities, and other Interests of Tribes) contains an extensive set of recommended actions and policies to support Tribal involvement in offshore wind energy decision-making, including the use of traditional knowledge, protection of data sovereignty, protection of sacred views, Tribal involvement in ground disturbing activities, Tribal policy coordination with similar state policies, and Tribal engagement with the state, federal agencies, and developers. The recommended actions also include Tribal mitigation agreements and a new requirement for cumulative impact assessment to be conducted prior to any future offshore wind energy leasing.

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	priorities, and expertise are integrated into decision-making processes. We greatly appreciate that the crisis of Missing and Murdered Indigenous People (MMIP) is identified within the Roadmap, and advocate that it be a core consideration in offshore wind planning.³⁹ Extractive industries and transient workforces throughout our nation have been linked to documented histories of MMIP. State and local agencies should proactively develop safety, reporting, and communication strategies to protect Native children, women, and vulnerable community members. These strategies must be comprehensive, encompassing education, prevention, policy development, funding, and enforcement, and be developed in partnership with Tribal communities and entities, drawing on best practices such as those advanced in California.⁴⁰ The Oregon strategy should explicitly incorporate guidance from Oregon and regional Tribes, rather than relying primarily on California-based approaches. Doing so will help ensure that MMIP safety planning reflects the priorities, expertise, and lived experiences of Tribes and their lands that overlap with Oregon’s state lands. The protection of sacred viewsheds and culturally significant sites is also critical. The Pacific Northwest coastline has been home to Tribal Nations since time immemorial and contains places of deep cultural and religious importance. All proposed offshore wind activities must fully comply with federal, state, and local Tribal consultation requirements, with a clear priority to avoid impacts wherever possible. Where impacts cannot be avoided, developers must minimize and mitigate impacts in close partnership with affected Tribes. Offshore wind development must also account for impacts to key species and habitats that are central to Tribal lifeways. Tribal Nations have long served as stewards of coastal and marine ecosystems, and disruptions to these systems can have cascading ecological and cultural consequences. Projects must adhere to all applicable conservation and wildlife protection policies while incorporating Tribal ecological knowledge to better understand and address both direct and indirect impacts. Finally, equitable economic participation and co-governance opportunities must be central to offshore wind development. Too	

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	often, Tribes bear disproportionate burdens from energy infrastructure without receiving corresponding benefits. Developers should explore opportunities for co-management and shared decision-making authority. Tribal Mitigation and Benefit Agreements are an important tool in this process and must be implemented fairly, transparently, and in a manner that reflects the full scope of potential impacts. Oregon should also continue advancing policies that support Tribal co-management as a standard practice, not an exception. Without centering Tribal sovereignty, self-determination, and co-governance, offshore wind development in Oregon risks perpetuating historical inequities and undermining Tribal rights and interests. In contrast, centering these principles strengthens the long-term legitimacy and sustainability of the energy transition, supporting more durable, equitable, and broadly supported outcomes, and enabling projects to move forward with reduced conflict, greater trust, and improved certainty.	
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Section 3: Scenario Implications A recurring issue across the current framework is the implicit treatment of pathways as interchangeable or neutral alternatives. In reality, each Pathway represents a distinct set of tradeoffs with long-term implications for Oregon’s environment, communities, economy, and energy system. The Roadmap should more clearly distinguish these tradeoffs, including: (1) The risks of foreclosing future clean energy options, (2) the consequences of delayed action under worsening climate conditions, (3) the opportunity costs of limited participation in a growing industry, and (4) the environmental and equity implications of shifting impacts elsewhere. Providing a more transparent and comparative assessment will better equip decision-makers to evaluate not only what each Pathway enables, but also what it constrains.	This comment was discussed at the May 2026 Offshore Wind Energy Roadmap Roundtable meeting and further considered by DLCD. For any pathway that does not involve development of offshore wind energy for Oregon, the "Benefits and Considerations" table for that pathway notes that in order to meet state energy and climate goals, Oregon would need to develop alternative sources of non-greenhouse-gas emitting energy. DLCD believes that it is not feasible to reasonably speculate what the opportunity costs and climate effects to the state and region would be if offshore wind energy is not developed, or what other energy options may be available in the future. As such, this recommendation has not been incorporated into the Roadmap; however, a more comprehensive regional analysis of energy choice tradeoffs may be appropriate to include in future revisions to the Oregon Energy Strategy, as discussed in Section 6.2.3 (Strategy: Improve Understanding of Offshore Wind’s Potential Benefits and Costs for Oregon to Clarify Investment Decisions).

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Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Pathway 1: No Offshore Wind Development Pathway 1 should not be interpreted as a neutral or status quo option, and the Roadmap should articulate the potential environmental consequences of this pathway for biodiversity, climate, communities, and energy demand. In practice, this scenario represents a decision to forego access to a significant, zero-emission energy resource at a time when electricity demand is rapidly increasing and climate obligations are becoming more urgent. This choice carries long-term implications for Oregon’s energy reliability, resource adequacy, and ability to meet its decarbonization goals. The Roadmap should explicitly acknowledge these risks and require that Pathway 1 include robust, proactive investments in marine spatial planning, habitat protection, Enforceable Policy updates, and regional science coordination, including full participation in the WCSC. It should evaluate the long-term opportunity costs of foreclosing offshore wind as a future resource and assess how this Pathway affects Oregon’s ability to meet its climate and clean energy goals under high-demand scenarios.	The description of Pathway 1 in Section 4.2.1 (A Pathway Focused on Existing Ocean Uses Without Offshore Wind Energy) has been revised to discuss future implications for coastal energy affordability, reliability, resiliency and the potential challenges in the future if energy supply cannot reliably meet demands year-round and if and transmission disruptions through events such as wildfire become more prevalent. The Pathway 1 (Section 4.2, No Offshore Wind Energy) description also includes a statement that if the policy gaps identified in the Roadmap are not addressed, the state would use its existing enforceable policies to review any potential future offshore wind energy development.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Pathway 2: Economic Participation Only Pathway 2 seeks to capture elements of the offshore wind value chain without hosting generation infrastructure, but in practice creates an imbalance between economic benefit and governance authority while raising concerns about the externalization of environmental and social impacts. The Roadmap should more clearly identify this tradeoff and avoid framing this Pathway as a fully holistic option, as it limits Oregon’s ability to influence environmental protections, labor standards, and community outcomes associated with development. We recommend that Pathway 2 be strengthened by requiring the same level of investment in science, marine planning, and community leadership and engagement as development pathways, and by explicitly evaluating the regional equity implications of shifting environmental burdens to other states. The Roadmap should also clarify the limitations of this approach in delivering durable workforce and supply chain benefits absent direct project development and establish criteria for how Oregon would ensure meaningful and equitable participation in regional projects.	Language has been added to under Pathway 2, Section 4.3.1 (A Pathway Focused on Offshore Wind Energy Supply Chain and Support Services—Not Hosting Projects off Oregon’s Coast) to describe the challenges of developing a supply chain industry in the state absent an offshore wind energy development presence. However, DLCD does not agree that Oregon cannot deliver durable workforce and supply chain benefits through the Roadmap’s recommendations absent direct project development. Any new port infrastructure development in the coastal zone would still be subject to federal consistency review under the CZMA, and the labor standards in HB 4080 would also apply to offshore wind energy-related supply chain opportunities. Per the recommendation, the recommendations for a marine spatial planning inventory and science collaboration work have been broadened to apply under any pathway.

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Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Pathway 3: Pilot-Scale Development Pathway 3 offers an exploratory approach but introduces a significant tradeoff between potential knowledge generation and ecological risk, particularly given the likelihood of siting in nearshore or state waters where sensitive habitats are concentrated. The Roadmap should more directly acknowledge these significant risks, particularly those to the environment and wildlife. We recommend that the Roadmap address infrastructure ambiguity by clarifying whether and how pilot projects would connect to longer-term planning for transmission, ports, and supply chains, in order to avoid fragmented or inefficient investments. Finally, we recommend that the Roadmap include a clear discussion under Pathway 3 of the significant differences between nearshore development and offshore wind projects in federal waters, which are deeper, more technically complex, and subject to harsher ocean conditions. This distinction is important to clarify that a pilot project in state waters would not necessarily yield transferable or demonstrable insights for the design, deployment, or scaling of offshore wind in federal waters.	Any proposed pilot project in state waters would need to be found consistent with state enforceable policies and obtain an easement from DSL, subject to applicable statutes and administrative rules governing those easements. Language has been added to Section 4.4.1.1 (Pilot project: Oregon Pursues a Pilot-Scale Offshore Wind Energy Project) to discuss the potential incompatibility of a pilot project in state waters with future full-scale development in federal waters.
Offshore Wind Community of Practice (National Wildlife Federation, Rogue Climate, Climate Solutions, OCEAN Winds, Sierra Club Oregon, Southern Oregon Climate Action Now (SOCAN), BlueGreen Alliance, Electrify Now, Oregon Shores Conservation Coalition)	Pathway 4: Utility-Scale Offshore Wind Development Pathway 4 presents the most significant opportunity to advance Oregon’s clean energy, climate, and grid reliability goals, but also requires the highest level of coordination, investment, and governance to be implemented responsibly. The Roadmap should more fully articulate this Pathway as a system-wide transformation and identify the necessary actions to support it, including state-led procurement, integrated transmission planning, port and infrastructure investment, and comprehensive workforce and supply chain strategies. The Roadmap should explicitly incorporate the use of state authority—such as the Coastal Zone Management Act consistency review, Enforceable Policies, and procurement mechanisms—to require high standards for environmental protection, labor practices, and community benefits.	Thank you for your comment. These suggestions are included as recommended actions in Section 6 (Recommended Strategies and Actions for the Seven Objectives).

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Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	The Roadmap Should Identify and Leverage the Full Range of State Authorities to Protect Wildlife and the Environment States have meaningful authority to shape offshore energy planning and development outcomes even for planning and projects in federal waters. Of particular importance to our organizations and the millions of members and supporters we represent, are the environmental and wildlife protections that can be secured when states fully leverage their authority, particularly for offshore wind energy. The Roadmap is an excellent and necessary foundation for this work, illustrating how a coordinated framework of state laws, planning systems, and federal laws can collectively provide Oregon significant influence over activities in waters off its coastline. However, we see an opportunity to strengthen the Roadmap by more clearly incorporating the full range of actions the state can take throughout all Pathways (including 1. No Offshore Wind Development and 2. Economic Participation Only) to ensure meaningful benefits for Oregon’s rich biodiversity.	Section 2.4 (Oregon Offshore Wind Energy Permitting Process and Roles) of the Roadmap describes the full range of federal, state, and local authorities that are involved in offshore wind energy decision-making. Appendix A of the Roadmap describes the range of state and local policies and authorities that would be applicable in reviews of offshore wind energy projects to further protection of wildlife and the environment, as well as other policy interests. In response to the latter part of the comment, the recommendation to amend policies consistent with the enforceable policy assessment in the Roadmap has been broadened to apply to all Roadmap pathways.
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	1. Updating the TSP and Enforceable Policies Is Essential Across All Pathways to Safeguard State Authority During Consistency Review The Roadmap rightly emphasizes that the TSP is a central policy tool for addressing policy gaps.²⁰ We support this approach and stress that, given federal rollbacks of environmental protection laws and renewable energy priorities, Oregon should prioritize state-led, enforceable protections. The Roadmap should clearly highlight the state’s authority across all four Pathways to implement mandatory safeguards for wildlife and habitats through binding policy tools. We recommend that, given the federal landscape, in the immediate term, Oregon should prioritize updating the TSP and the Enforceable Policies identified in the Enforceable Policies Assessment as an action item across all of the four Pathways, including scenarios with no offshore wind development (i.e. Pathways 1 and 2). These updates are not only critical for shaping responsible offshore wind development if it proceeds, but also for strengthening baseline protections for Oregon’s coastal and marine resources in the absence of such development. Effective and proactive marine management requires regular revision to respond to rapidly changing ocean conditions, incorporate new	A new Section 2.4.3 (Federal Consistency and the 2024 BOEM Leasing Review), has been added to highlight the federal consistency review of the 2024 BOEM leasing review and the state’s opportunity to influence decisions under its CZMA review authority. Language has also been added to the key recommendation for policymakers to emphasize that addressing policy gaps will strengthen Oregon’s position under any future scenario.

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	scientific information, and account for advances in technology and management practices. By updating the TSP now to establish clear, enforceable standards for marine resource protection—including but not limited to offshore wind-related activities—Oregon can ensure that any future federal actions in adjacent waters are subject to robust, legally enforceable state review, rather than relying on advisory guidance alone. Updating the TSP can be a time-intensive process – as demonstrated by the over four-year-long update of Part 3 - and we strongly recommend that the Roadmap establish Key Recommendations for Policymakers to initiate this process immediately, including under Pathways 1-2. Strengthening enforceable policies now provides legal clarity, proactive environmental protections, and a strong foundation for state decision-making on future offshore development. Incorporating TSP updates with an eye on the potential of offshore wind energy (large-scale) as an action across all Pathways (1-4) allows Oregon to define limits and to define limits and “red lines” for energy, securing robust environmental safeguards and a well-documented evidence-based rationale for future decisions, even if development does not proceed. Although Oregon may ultimately select a pathway that does not include offshore wind development in the nearterm, the state should act now to ensure that offshore wind energy remains a viable option in the future. Failing to update the TSP and its Enforceable Policies risks limiting Oregon’s ability to meaningfully influence or condition future federal actions in federal waters. In effect, inaction could constrain the state’s authority under the CZMA and reduce its ability to protect coastal resources and communities in the face of evolving federal priorities, including potential efforts to expand development of the Outer Continental Shelf. Proactively strengthening these authorities now will better position Oregon to both safeguard its interests and retain flexibility in future energy planning decisions. Oregon, and DLCD in particular, has already leveraged the power of the consistency review process and the strength of its Enforceable Policies during the 2024 offshore wind energy leasing process. We recommend that the Roadmap elaborate on what the state was able	

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	to secure for environmental and wildlife protections during the initial Federal Consistency review. Oregon has already demonstrated how effectively it can use its authority under the federal consistency review during the initial offshore wind energy planning process in 2024, ensuring that proposed projects align with the state’s coastal management priorities. While the overall process ultimately did not move forward, Oregon’s consistency review under the CZMA secured significant protections for state interests (see Lease OCS-P 0566 and 0567 Section Addendum C Section 6), showing that state-led review can achieve meaningful safeguards even before development begins as a condition of the lease. These conditions included pre-survey coordination with DLCD, monitoring reporting to DLCD, regional coordination among lessees, a required 250 foot buffer from hard structures such as rocky reefs, and a 1000 foot anchoring buffer from sensitive habitats, among others.²¹ The Roadmap should, explicitly highlight these successes to demonstrate why actions within each pathway, such as enhancing its Enforceable Policies, are necessary and impactful.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	2. The Roadmap Must Fully Address Key State Authorities, Including Over Infrastructure, Procurement, and Regulation In addition to the TSP, Oregon can enforce its environmental priorities in federal offshore development through control over state-level infrastructure, energy procurement, and environmental regulations. These authorities allow the state to shape project siting, design, and implementation well before and beyond federal decision-making.	DLCD agrees with this comment and believes it is already reflected in the Roadmap recommendations.

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Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	Infrastructure and Transmission Authority Oregon has authority over the construction of transmission cables that cross state-managed submerged lands, as well as control over port infrastructure for construction, staging, and offloading. Due to the structure of the federal offshore wind energy process and limits of federal authority, transmission considerations are not comprehensively accounted for at the earliest stages of the siting process (see Figure 2-4 in the Roadmap).²² The Roadmap aptly recommends that even in the no offshore wind energy Pathway, the state must conduct regional transmission grid infrastructure planning.²³ We recommend that the Roadmap build on this recommendation to policymakers by more clearly identifying how the state can use its infrastructure authority to guide transmission siting and avoid impacts to sensitive coastal, marine, and terrestrial resources across all four Pathways. We appreciate the Roadmap’s attention to this issue within Table 5-1 (see page 98), and encourage further specificity on how these authorities can be operationalized in practice, particularly within the context of 6.2.2.1 Action: Support investments and planning for grid infrastructure upgrades to increase resilience and facilitate new energy options, and 6.3.3.1 Action: State reviews of offshore wind energy authorizations should consider the cumulative effects of dependent or interrelated shoreside and in-estuary development. The Roadmap should recommend updating the TSP to better accommodate regional-scale planning for offshore wind development, including the transmission infrastructure needed to support it.	Part Four of the Territorial Sea Plan (subsea cables) was updated in 2023. The Ocean Policy Advisory Council is planning to perform another update based on the recommendations of the Roadmap in the coming years. Part Four of the TSP already contains policies that protect sensitive marine resources, including ecological standards and a mitigation hierarchy. The Roadmap's recommendation to conduct state-led marine spatial planning inventory inclusive of federal waters, state waters, and shore is intended to guide potential future siting not only of offshore wind turbines, but the transmission cables to shore. Major transmission infrastructure onshore would be regulated by local government development codes where applicable and the authority of the state Energy Facility Siting Council. The role of EFSC is discussed within the enforceable policy assessment in Appendix A. DLCD believes the core suggestion in this comment is already addressed within the Roadmap.

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Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	State Procurement Authority The Roadmap does not adequately consider the need for a state procurement authority, nor the actions required to implement one, instead noting this as “beyond the scope” of the document. This is a critical gap. State-led procurement is among the most powerful tools available to shape outcomes, not only for ratepayers, but also to embed essential environmental and community-centered provisions into project contracts. As the Roadmap acknowledges, state-led procurement can be a mechanism to securing environmental commitments from developers when selling power to the state. In other states, this has included environmentally focused evaluation criteria that guide project selection, allowing the state to prioritize proposals that demonstrate robust wildlife protections, effective habitat avoidance, and comprehensive science-based mitigation measures. State-led procurement has also successfully secured millions of dollars from developers to fund regional research and monitoring, improving understanding of offshore wind development impacts on wildlife.²⁴ We recommend that the Roadmap more clearly identify and outline how Oregon can establish robust monitoring, reporting, and compliance mechanisms tied to state procurement authority, ensuring that environmental performance commitments are tracked and enforced throughout the lifecycle of offshore wind energy projects. While the Roadmap highlights opportunities for the state to require developers to submit monitoring reports, implement adaptive measures if impacts exceed thresholds, and make these reports publicly available, it could be strengthened by expanding this discussion to emphasize the state’s authority to include enforceable milestones in procurement agreements for habitat protection, mitigation implementation, or community benefits agreements, along with clearly defined consequences for non-compliance. Embedding these accountability measures into procurement provides Oregon a pathway to operationalize environmental protections so they are not merely aspirational but actively enforceable with transparency and confidence for communities. We recommend that the Roadmap incorporate action items for community and ecological accountability	Additional information has been added to Section 6.2.2.1 (Action: Explore potential economic incentives, energy planning policies, procurement frameworks and authorities, or other amendments to Oregon energy policy that might attract and facilitate long lead-time resources, such as offshore wind energy) regarding pathways to a pilot state-led procurement program as an option to consider, including points made in this comment. Section 6.5.2.3 (Action: Explore community agreement requirements in power procurement policies) further recommends exploring community agreement requirements in power procurement policies. Section 6.5.3 (Strategy: Community Agreements as a Formal Part of the Process) has been revised to include language about the use of contractual milestones.

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	to be embedded in state-led power purchase agreements (PPAs) under Pathways 3-4. Specifically, the Roadmap should include requirements for all offshore wind energy projects under state PPAs to include enforceable commitments to local community benefits, including protections for marine ecosystems. Community benefit agreements (CBA) should be tied to contractual milestones ensuring that project approvals, payments, or incentives are contingent on meeting clearly defined CBA deliverables (for activities within state-jurisdiction). CBAs should establish monitoring and enforcement mechanisms that require regular reporting on CBA implementation, with state authority to enforce compliance, including corrective measures for non-performance.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	State Procurement, Continued Finally, the Roadmap should clearly articulate the need for CBAs to be drafted in a way that allows them to be updated as projects progress to respond to changing community needs or environmental conditions ensuring benefits remain relevant over time. Additionally, all CBAs and related monitoring reports should be made publicly available to provide accountability, community oversight, and confidence in enforcement. We recommend that the Roadmap also evaluate and articulate the actions needed to establish state-led procurement. To date, nearly all successful offshore wind energy procurement in the U.S. has relied on centralized, state-led process, with Virginia as the primary exception through its legislatively directed, utility-led model. Absent consideration of a state procurement framework, the Roadmap risks falling short of providing a viable pathway for implementation of Pathway 4, while also relinquishing a key opportunity for Oregon to set terms and conditions that reflect its policy priorities.	Additional information has been added to Section 6.2.2.1 (Action: Explore potential economic incentives, energy planning policies, procurement frameworks and authorities, or other amendments to Oregon energy policy that might attract and facilitate long lead-time resources, such as offshore wind energy) regarding pathways to a pilot state-led procurement program as an option to consider, including points made in this comment. Section 6.5.2.3 (Action: Explore community agreement requirements in power procurement policies) further recommends exploring community agreement requirements in power procurement policies.

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Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	Regulatory and Permitting Authority Finally, Oregon has state-level regulatory environmental review authority over individual permits, as noted in the Roadmap, after permits are secured for a Project.²⁵ Federal laws such as the Marine Mammal Protection Act, Clean Water Act, and Endangered Species Act, shape how ocean resources are managed. Furthermore, at the local level, city and county governments can leverage zoning ordinances to regulate onshore transmission infrastructure.²⁶ The Roadmap does not sufficiently emphasize the ways in which the state can proactively control environmental planning and decisions across all four Pathways through its regulatory and permitting authority. In particular, renewable energy certificate (REC) program design and environmental regulatory frameworks provide important, and currently underutilized, mechanisms for shaping offshore wind development outcomes. State agencies are not solely reactive permitting bodies; they have the capacity to set clear, enforceable expectations that influence project design, construction practices, and long-term operations. By integrating science-based environmental standards, adaptive management requirements, and robust monitoring into REC eligibility criteria, the state can help ensure that development proceeds in a manner that avoids, minimizes, and mitigates adverse impacts. Under Oregon’s Renewable Portfolio Standard, utilities demonstrate compliance in part through the acquisition and retirement of RECs, which represent the environmental attributes of one megawatt-hour of renewable electricity generation.²⁷ RECs are tracked through regional systems and serve as a key accounting mechanism for verifying renewable energy procurement, but they can also be structured to reflect broader policy priorities beyond simple generation. We recommend that the Roadmap incorporate a discussion on RECs and opportunities for the state to incentivize environmentally responsible offshore wind development. For example, Oregon could condition REC qualification or preferential procurement on adherence to robust environmental standards, including wildlife impact avoidance, monitoring, and adaptive management commitments. We acknowledge the few key legal and practical constraints for Oregon to keep in mind when structuring RECs, such as	DLCD consulted with staff from the Oregon Department of Energy regarding the potential to use Renewable Energy Credits (RECs) under the state’s Renewable Portfolio Standard as another method to influence project design, construction practices, and long-term operations. ODOE staff suggested that the Oregon RPS may not be a reliable pathway to securing adaptive management requirements or other desired measures in an operating project absent significant and potentially controversial legislative changes. One potential reason the Oregon RPS may not be a reliable pathway is that the current RPS statute does not impose such conditions on RPS eligibility of wind energy facilities. Another reason is that no Oregon utilities are currently required to use RECs from wind energy facilities rather than any other RPS-eligible renewable energy sources. Additionally, individual renewable energy facilities, including any OSW project, are only incentivized and not mandated to register and demonstrate eligibility for the Oregon RPS. Further, any contractual requirements for Oregon RPS eligibility would likely not be applicable if OSW energy is not sold in Oregon but is instead sold to ratepayers in another state. The other points made in the comment about the risks from the dormant commerce clause, federal preemption, administrative feasibility, and market structure considerations are also barriers to the use of RECs in this manner. For all these reasons, ODOE staff suggested that a different method, such as reinforcing the desired requirements into a land use standard applicable to offshore wind energy as is recommended in the Roadmap, may be more secure.

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	the Dormant Commerce Clause, federal preemption risks, administrative feasibility and market structure considerations.²⁸ However, Oregon can condition REC eligibility on environmental standards if those standards are applied in a non-discriminatory manner, tied to legitimate environmental objectives (such as the state’s climate commitments), and designed to complement federal authority. This diverse capacity of state authority illustrates how Oregon can act well in advance of any proposed offshore development, wind or otherwise to secure alignment with the state’s environmental priorities. By preparing and exercising its regulatory and policy authority early across all four Pathways, the state can ensure that if offshore wind energy planning or development occurs, it proceeds with the most protective measures.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	Advisory Role BOEM has indicated under several circumstances that it will take into consideration Oregon’s priorities and advanced planning when making decisions regarding offshore wind development, particularly regarding siting and the lease sale. As we expand upon further below, BOEM has indicated that it will consider siting recommendations from the state for projects in Federal waters, which is why marine spatial planning is a significant opportunity to wield influence over the process. Additionally, BOEM has indicated previously that it will consider Oregon’s priorities for federal leasing and auction conditions, such as encouraging the use of conservation bid credits, where a portion of lease bids could be directed toward habitat protection or other conservation priorities. However, BOEM is not legally required to implement such credits, it retains full discretion under the Outer Continental Shelf Lands Act to structure leases, including the adoption of credits, multipliers, or set-asides. Nonetheless, Oregon’s recommendations, while not binding, provide a critical opportunity to communicate the state’s conservation and coastal management priorities to the federal government. Incorporating these interests in good faith allows BOEM to align lease design with Oregon’s environmental goals, demonstrating how the state has a potential to continue to meaningfully influence offshore wind energy leasing.	Thank you for your comment. DLCD agrees that the state has an opportunity to guide any future federal leasing activities and communicate state interests by conducting its own marine and coastal spatial planning inventory. This recommendation is included in the Roadmap.

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Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	II. The Roadmap Should Recommend Environmental Planning and Protections Across All Pathways, Including No-Development Scenarios Given ongoing shifts in federal energy priorities from renewables to fossil fuels, Oregon cannot rely on federal leadership to advance its clean energy goals and uphold its environmental and climate commitments. At the same time, Oregon has committed to one of the nation’s most ambitious clean energy goals by requiring major utilities to reduce greenhouse gas emissions completely by 2040.²⁹ Meeting these commitments will require sustained action regardless of federal direction. Oregon retains a range of policy tools, regulatory authorities, and planning mechanisms that can be used to proactively protect coastal and marine ecosystems while advancing clean energy objectives. The Roadmap should explicitly recognize that these authorities can and should be leveraged across all four Pathways to ensure precautionary protections for all development decisions. Development decisions will undoubtedly arise as Oregon works to meet its clean energy goals and commitments, therefore, environmental safeguards should not be treated as contingent on a specific offshore wind energy pathway, but should instead be integrated into all stages of evaluation and planning. As the interconnected climate and biodiversity emergencies intensify, the window to make responsible, science-based, and community- and traditional knowledge-informed decisions is shrinking. It is therefore critical that Oregon acts both swiftly and thoughtfully. The Roadmap should clearly reflect this urgency, and at this point, does not. Oregon does not operate in isolation, marine ecosystems are facing escalating stressors, and the need for timely, precautionary, and well-informed decisions has never been greater.	The prioritization framework in the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been removed, and the planning and research actions are now included as recommended actions for all pathways in the Summary for Policymakers.

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Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	A. The Roadmap Should Embrace Scientific Preparedness and Monitoring, Including in Pathways 1 and 2 The Roadmap should advise Oregon to advance science capacity, expand and invest in ocean research and monitoring efforts, and actively coordinate regionally to support informed marine decision-making throughout all four Pathways. The Roadmap currently underemphasizes the need for continuous investment in habitat research, ecological monitoring, and regional coordination within Pathways 1-2. These are essential for guaranteeing that future decisions are informed, effective, and aligned with Oregon’s climate and conservation commitments. Enhancing and expanding on these elements will position the state to anticipate and manage ecological impacts, guide responsible development, and uphold its environmental and climate goals in a science-driven and forward-looking manner.	The prioritization framework in the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been removed, and the planning and research actions are now included as recommended actions for all pathways in the Summary for Policymakers.
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	1. Marine Spatial Planning Must Be a Part of Each Roadmap Pathway The Roadmap currently incorporates an immediate recommendation for the state to conduct a state-led marine spatial planning process to identify suitable areas for offshore wind energy siting and inform federal leasing actions within Pathways 3-4 .30 We appreciate DLCD incorporating Key Recommendation for Policymakers 4, to fund a state-led marine and coastal spatial planning process to identify what, if any, areas offshore are suitable for offshore wind energy development.³¹ However, we recommend that this action also be explicitly included under the no offshore wind development and economic participation-only Pathways (1-2). The Roadmap should revise its ranking of MSP under Table 6-4 #21 as “Medium” or “High” across all Pathways. We further encourage DLCD to incorporate under all Pathways a recommendation for updating TSP Parts 4 and 5 only after—and in alignment with, and informed by—insights derived from large-scale MSP. Even in the non-offshore wind energy scenarios, proactive marine spatial planning allows the state to establish precautionary protections, identify sensitive habitats and avoidance areas, and prepare science- and community-informed guidance for potential ocean uses. Oregon’s TSP Part 5 focuses primarily on siting and regulating renewable energy facilities within state territorial waters,	The prioritization framework in the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been removed, and the planning and research actions are now included as recommended actions for all pathways in the Summary for Policymakers.

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	setting policies, standards, and area designations for that purpose specifically. It does not provide a fully integrated multi-sector planning framework for all marine uses across large ocean regions. Adding a mandate for broad-scale MSP would address this gap. The TSP currently adopts a precautionary framework for renewable energy development, prioritizing pilot projects and phased buildout in the initial stages of commercial activity. 32 At this time, Oregon’s framework includes spatially explicit, sector-specific planning tools but does not mandate a comprehensive MSP process. Requiring that MSP be conducted and with an eye toward potential larger scale development, in advance, strengthens Oregon’s ability to manage cumulative stressors, provides clarity for coastal communities and Tribal partners, and ensures that any future decisions, should offshore development move forward, are grounded in rigorous, state-led planning. Even if commercial development for offshore wind is not the immediate goal, large-scale MSP is a proactive strategic planning tool which can prepare the state to make decisions at multiple scales, and strengthens Oregon’s influence in future offshore renewable energy decisions. Establishing a robust MSP framework in advance, positions Oregon to proactively shape federal actions in the seaspace, rather than reacting to them, especially amid broader federal policy shifts that may prioritize expanded offshore development with fewer environmental safeguards.33 We recommend that the Roadmap emphasize the value of early large-scale MSP to identify high risk or high conflict areas that should be deprioritized for development, potentially nominated for state or federal protection, and thereafter identified incorporated into the TSP though amending Part 5. The TSP has room to improve by moving from mostly descriptive mapping to binding exclusion or avoidance zones. We recommend that the Roadmap encourage amendments to the TSP to integrate dynamic management areas that shift with species movement. At this time, some parts identify sensitive habitats but do not impose strong, enforceable restrictions across all ocean uses. MSP is an opportunity for Oregon to use its state authority to ensure high conflict areas are removed from development consideration.	

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Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	Marine Spatial Planning, Continued Key Recommendation for Policymakers 4 should explicitly be incorporated as an action item under all four Pathways and be expanded upon to recommend that Oregon consider not only pilot projects and phased development, but comprehensive marine spatial planning. This approach supports the identification of suitable areas, avoidance of conflicts, and evaluation of cumulative impacts at appropriate spatial scales that are not at this time recommended or accounted for within the TSP. Explicit authority for MSP, expanding beyond pilots to include broader-scale planning, should be incorporated into the TSP. MSP must be informed by cross-sector and collaborative advisory input. Even in scenarios where offshore wind development does not proceed, MSP bolsters Oregon’s ability to manage existing and emerging ocean uses, protect biodiversity, and respond to future pressures. In development pathways, it provides the foundation for responsible siting, impact avoidance, and efficient permitting. Investing in MSP now no matter the Pathway chosen, secures Oregon’s preparation for the future with a comprehensive, defensible framework for ocean management under any scenario. MSP can also be coupled with baseline data collection efforts which the Roadmap already advises for all pathways. Further, as noted in the Roadmap, the federal government has already indicated that they will consider state-led MSP in siting decisions.³⁴ If Oregon forgoes MSP, the state would be ceding a critical policy lever to influence federal decisions.	The prioritization framework in the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been removed, and the planning and research actions are now included as recommended actions for all pathways in the Summary for Policymakers.
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	Habitat Mitigation Policy The Roadmap should support implementation of the Oregon Department of Fish and Wildlife’s (ODFW) Habitat Mitigation Policy (HMP). Action items should be incorporated throughout all four Pathways recommending the expansion of the agency’s capacity to identify, classify, and map sensitive habitats across terrestrial, freshwater, and nearshore environments. The HMP provides a science-based framework to avoid, minimize, and mitigate adverse impacts to fish and wildlife habitats from development, and if fully resourced, can function as a proactive planning tool rather than a reactive, project-by-project review	A new gap has been added to the enforceable policy summary table in Section 5 (Table 5-1) of the Roadmap and in Appendix A (Table A-4), recommending that the TSP be amended to incorporate concepts, terms, or methods in the Habitat Mitigation Policy that are applicable or appropriate to ocean environments. The TSP should also establish a consistent method for identifying important marine habitats for which different standards apply. The purpose of this review would be to maximize protection of sensitive habitats using the strengths of both policies. The gap assessment also recommends that guidance be created to assess and recommend potential tools available to mitigate marine habitat effects, which could assist in the implementation of

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	mechanism. While ODFW’s role in offshore wind energy development is primarily advisory given that permitting authority in federal waters rests with agencies such as BOEM, the HMP nonetheless exerts substantial influence over both state and federal authorizations. Additionally, DLCD, the lead agency for approving, approving with conditions, or denying the CZMA consistency review, could incorporate HMP classifications into its coastal planning and federal consistency reviews under the CZMA. The HMP classifications could be used as the basis to condition or restrict permits for offshore wind-related onshore and nearshore energy infrastructure in state waters, such as cable landfalls, substantive, and transmission corridors. ODFW’s habitat classifications, particularly “essential” and “irreplaceable”, can serve as a functional equivalent to strict protection or no-impact zones when consistently applied through state and local permitting processes and incorporated into enforceable policy frameworks. To fully realize this potential, the Roadmap should identify targeted state investments in: high-resolution, up-to-date habitat data (including offshore and nearshore ecological baselines), spatial mapping tools, interagency coordination across natural resource, coastal, and energy agencies, technical staff capacity to support early stage planning, review, and enforcement. Formal integration of HMP classifications into Oregon’s statewide land-use planning, agency rulemaking, and permitting frameworks, coupled with the CZMA consistency review, could improve consistency, transparency, and enforceability. This approach would reduce regulatory ambiguity for developers while signaling that impacts to “essential” and “irreplaceable” habitats are to be avoided. By expanding habitat classification, the state can provide early siting clarity that steers development away from the highest-conflict areas before substantial investments are made. If embedded in enforceable policy, these classifications create a defensible legal basis for Oregon to condition, redesign, or where necessary, object to projects that would adversely affect priority habitats. This not only strengthens conservation outcomes but incentivizes developers to select lower-impact sites that have been informed by the state, from the outset.	mitigation through the TSP in future reviews The additional mapping recommendation can be included in fiscal impact statements associated with a marine and coastal spatial planning process. The mapping could be connected to the TSP update process. Alternatively, the state has the ability to require sufficient information for determining consistency with policies during permitting reviews. If the standard of protection for habitats is clearly established in the TSP, then this step of data collection would be included later. The risk to developers would be that they are proposing development in an unsuitable location based on the habitats potentially affected. This risk may incentivize developers to participate in and contribute to early spatial planning inventory efforts by the state.

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	Even where offshore wind energy development proceeds in federal waters, all projects must ultimately pass through state jurisdiction. Export cables traverse state waters and sensitive coastal habitats, and onshore infrastructure, including substantive, transmission lines, and grid interconnection facilities, require state and local permits. A bolstered HMP, backed by clear and sustained investments in both technical capacity and financial resources by the ODFW, would ensure that these critical “chokepoints” are governed by well-defined, science-based habitat protections. In turn, this framework would play a decisive role in shaping which offshore projects the state recognizes as environmentally responsible, guiding development toward proposals that demonstrably avoid and minimize impacts to high-value and sensitive habitats. To be effective, however, these habitat classifications must be developed, validated, and spatially mapped well in advance of project proposals. As such, they should be embedded as core action items across each of the four Pathways in the Roadmap so they are available for early-stage planning, usable in permitting decisions, and capable of meaningfully shaping siting, design, and investment choices from the outset.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	2. The Roadmap Should Recommend Participation in Regional and State Research and Monitoring Oregon Research Agenda We commend DLCD for including Key Recommendation for Policymakers 2, to develop and fund an offshore wind energy research agenda to secure reliable and trustworthy data to inform future energy development.³⁵ Ensuring that decisions are grounded in reliable, science-based, and community-informed data is necessary before advancing offshore wind development in Oregon. We recommend that the Roadmap explicitly emphasize the need for eNGO partners and other interested and affected parties to contribute their input and expertise in developing an Offshore Wind Energy Research Agenda. This could take the form of an advisory role, serving as a technical expert, or participating as a committee member if a formal committee is established to guide the agenda. Including eNGO perspectives will help ensure the research agenda is comprehensive, science-based, and reflective of community and environmental priorities.	Section 6.3.2.5 (Action: Establish a research collaborative to build Oregon-specific scientific consensus around offshore wind energy research and science needs) mentions "other interested non-governmental interests", which includes environmental NGOs. A key function of this collaborative is to oversee the continued development of an offshore wind energy science agenda for Oregon. A sentence has also been added to state, " The collaborative should be broad in its membership and accessible to the public with periodic engagement and outreach."

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	Several states on the East Coast have created research agendas, in coordination with the Regional Wildlife Science Collaborative, and include advisory bodies or working groups with cross-sector representation to guide state research. For example, New Jersey hosts the Research Monitoring Initiative through the New Jersey Department of Environmental Protection. The Department established the New Jersey Offshore Wind Environmental Resources Working Group which informs the Governor’s offshore wind energy strategy and implementation. Similarly, New York State’s Environmental Technical Working Group, through the New York State Energy Research and Development Authority hosts a range of experts, including eNGOs to advise on state research. Oregon may find that existing entities, such as OPAC’s Scientific and Technical Advisory Committee, which created an initial research agenda, could serve this role. Nevertheless, the Roadmap should explicitly advise that the agenda be informed by a multi-sector advisory body.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	An Oregon Offshore Wind Science Entity Even if Oregon ultimately chooses not to pursue offshore wind development, there is a strong case for establishing an Oregon Offshore Wind Energy Science Collaborative. The Roadmap should incorporate a discussion on this potential framework within Pathways 2-4. Offshore wind development is already moving forward along the West Coast, particularly in California. As the ocean systems are interconnected, Oregon risks experiencing impacts generated elsewhere without the data or institutional capacity to respond effectively. Further, maintaining a state-specific collaborative ensures that when Oregon coordinates and participates with the regional West Coast Science Collaborative (though we recommend it do so regardless of the Pathway) that it can inform and shape robust research priorities, better advocate for state-specific offshore wind development related ecological concerns, and is better positioned in federal processes under the CZMA. Oregon’s ability to influence offshore wind energy decisions affecting its coast is significantly strengthened with the development of an Oregon specific Offshore Wind Energy Science Collaborative across all Pathways (1-4). However, we recognize capacity constraints in the state may limit Oregon’s ability to create a	The prioritization framework in the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been removed, and the planning and research actions are now included as recommended actions for all pathways in the Summary for Policymakers.

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	fully dedicated offshore wind scientific entity prior to choosing a development Pathway. Regardless of development, Oregon currently faces gaps in marine species distribution data, benthic habitat mapping, and long-term ecological monitoring. A state science collaborative could support baseline data collection, standardized methodologies, and data-sharing across agencies, institutions, and regionally. Further, the collaborative would advance knowledge relevant to climate-driven ocean change, marine ecosystem resilience, and cumulative impacts from multiple ocean uses. The creation of a formal collaborative enables Oregon to leverage federal and regional funding and avoid duplicative research efforts, while providing a structured mechanism for accepting and distributing funds. Most importantly, we recommend that the Roadmap incorporate an action item across Pathways 2-4, for the development of the Oregon Offshore Wind Science Collaborative because it preserves Oregon’s ability to make informed decisions related to offshore wind energy over time. As conditions change (environmental, technological, policy, economics), the state will not be starting from scratch. Decisions on whether to allow, limit, or prohibit offshore wind development can be grounded in Oregon-specific science rather than external assumptions. We recommend that the Roadmap clearly articulates how the state will both incorporate the perspectives of Oregonians into an Oregon Offshore Wind Science Entity and ensure transparency and communication regarding the entity’s work.	

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Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	West Coast Science Collaborative We strongly support and appreciate the inclusion of Key Recommendation for Policymakers 3, that the state participate in the West Coast Science Collaborative, currently being established by California.³⁶ Participation in the West Coast Science Collaborative presents an important opportunity for Oregon to share lessons learned, coordinate research regionally, and leverage collective expertise. Engaging in the collaborative does not endorse offshore wind development, but allows Oregon to stay informed on emerging science, monitor regional environmental trends, and understand potential impacts of offshore wind development on ecosystems and coastal communities. This participation also facilitates knowledge sharing with neighbor states, helping Oregon anticipate and prepare for broader offshore energy developments or other ocean uses. Additionally, involvement supports regional coordination on research priorities, strengthens relationships with community members, and ensures that Oregon’s policy decisions are informed by the best available science, regardless of which development pathway is chosen. Engagement in the collaborative can also provide the data and insights needed to adapt or pivot toward the pathway that best aligns with Oregon’s environmental, social, and climate objectives. The National Wildlife Federation, which participated in the drafting of these comments, sits on the Steering Committee for the Regional Wildlife Science Collaborative for the East Coast, and is a part of the eNGO caucus. The National Wildlife Federation has also been involved in the development of a similar Gulf Regional Science Entity within the Gulf of American Alliance, as well as the West Coast Science Collaborative in California. From these experiences, we strongly recommend full participation in the West Coast Science Collaborative, at the earliest stages, across all Pathways, including 1-2. Early participation will ensure data interoperability, alignment of research methodologies, and consistency in monitoring frameworks across jurisdictions. Marine ecosystems are inherently interconnected, with species movements, oceanographic processes, and cumulative impacts transcending state and federal boundaries. Without early coordination, Oregon risks developing fragmented datasets and	The prioritization framework in the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been removed, and the planning and research actions are now included as recommended actions for all pathways in the Summary for Policymakers. DLCD agrees that participation in a West Coast Science Collaborative, once active, represents an important opportunity to coordinate science understanding, needs, and opportunities across the region.

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	approaches that are more difficult to integrate regionally, limiting their use for decision making and reducing effectiveness of future planning. Even in the absence of near-term offshore wind development, participation in the Collaborative will enhance Oregon’s preparedness by providing access to regional data, expertise, and analytical tools. It will also position the state to more effectively influence and respond to federal actions and neighboring state decisions that may have ecological implications within Oregon’s waters. Additionally, because BOEM often produces regional consultation documents, consisting of Best Management Practices for wildlife and impact avoidance, minimization, and mitigation, Oregon’s participation in the WSCS throughout all four Pathways would allow the state to influence mitigation measures and stay informed on best management practices. In comments recently submitted by some of the undersigned organizations on the Blueprint for the West Coast Science Collaborative, we advocated for Oregon to be granted full voting membership on the Steering Committee, if and when the state initiates the Intergovernmental Task Force.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	West Coast Science Collaborative, continued We recommend that the Roadmap clearly articulate how DLCD, as the holder of Oregon’s seat on the Steering Committee, will both incorporate the perspectives of Oregonians into its participation and ensure transparency and communication regarding the Collaborative’s work. This should include identifying mechanisms for engaging Tribes, coastal communities, and stakeholders to inform Oregon’s positions, as well as processes for regularly sharing updates, findings, and outcomes from the Collaborative with the public. The Roadmap should consider the mechanism that it may use for this purpose, potentially integrating into existing structures or developing a caucus specific for informing the seat on the Collaborative’s Steering Committee.	The prioritization framework in the action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) has been removed, and the planning and research actions are now included as recommended actions for all pathways in the Summary for Policymakers.

Name	Comments	DLCD Response
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	3. The Roadmap Should Clarify the Scope of the Cumulative Impacts Assessment We recommend that the Roadmap clarify methodology and parameters of the action items for the pre-leasing cumulative impacts assessment identified in Longer-Term Priority Recommendation 6. IV, and outlined in Actions 6.3.3.1 and 6.3.2.3.37 While the inclusion of a cumulative impacts analysis is an important and appropriate step toward ensuring responsible development, additional specificity is needed to establish that such assessments are comprehensive, consistent, and decision-relevant. We support the Roadmap’s acknowledgment in this action item that an assessment will not answer all questions or uncertainties about project configurations or technologies in a lease area.³⁸ We appreciate that the Roadmap incorporates these action items to clarify the timing of an assessment; however, we encourage including additional recommended information within this item to further strengthen it. Specifically, the Roadmap should clarify that cumulative impacts assessments are to be conducted at ecosystem scale and extend beyond project-level impacts. Moreover, because the California Current Marine Ecosystem spans the entire Oregon coast, we appreciate that the Roadmap explicitly prioritizes coordination with West Coast States, and recommend that the new West Coast Science Collaborative may serve as an appropriate venue to ensure alignment and prevent duplication of cumulative impacts analyses. We recommend that a cumulative impacts assessment explicitly incorporate climate change projections and anticipated regional ocean changes, including shifting species distributions, oceanographic conditions, and habitat dynamics, using the best available information at the time of the assessment. Recognizing that data gaps and evolving knowledge may limit the precision of a full ecosystem-scale analysis, the assessment should be structured to inform responsible near-term development without creating unnecessary delays, while still providing a foundation for adaptive management and future refinement as additional data become available. The Roadmap should recommend that future policy development define spatial and temporal boundaries that reflect ecosystem	Additional language has been added to Section 6.3.2.3 (Action: Clarify the timing of a cumulative impact assessment and other information needs before leasing and permitting) to clarify the recommendation around a pre-lease cumulative impact assessment requirement being added to policy in the Territorial Sea Plan. Existing policy in the TSP already requires a cumulative effects analysis that considers effects from other projects and regional effects such as climate change. Further specificity may be recommended as Part Five of the TSP opens for rulemaking updates in coming years. The specific recommended refinements are now included in Section 6.3.2.3.

Name	Comments	DLCD Response
	processes and long-term environmental change, rather than limiting analysis to near-term or site-specific impacts; incorporate multiple environmental stressors, including climate change, biodiversity loss, and ocean condition variability; evaluate cross-sector interactions, ensuring that development is considered in the context of other ocean uses and their cumulative pressures on marine ecosystems; utilize best available science and adaptive frameworks, allowing assessments to be updated as new data and monitoring information become available; and ensure transparency and consistency (across the region with other assessments, such as in California), so that impact findings meaningfully inform leasing decisions and broader planning efforts and data-sharing can be smoothly shared.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	B. The Roadmap Should Consider Adopting a Net Positive Impact Framework Across All Pathways The Roadmap currently operates under the traditional mitigation hierarchy to achieve no net loss, where impacts are avoided, minimized, and mitigated back to the baseline. We recommend that the Roadmap consider a Net Positive Impact (NPI) framework as a guiding principle for future offshore wind energy policy in Oregon across all pathways. An NPI approach goes beyond minimizing harm or maintaining baseline conditions by requiring that projects deliver measurable ecological improvements relative to pre-development conditions. While the Roadmap appropriately reflects Oregon’s precautionary approach, including its enforceable policies, which call for managing uncertainty and risk through the application of a precautionary principle, these important safeguards may, on their own, reinforce a status quo baseline that does not fully address ongoing ecosystem decline and increasing biodiversity loss. Building on this precautionary foundation, the Roadmap should acknowledge that maintaining existing environmental conditions may be insufficient in the context of climate change and cumulative ecological stressors. We recommend that policy recommendations within Section 5 of the Roadmap that focus on avoiding or minimizing adverse impacts could be strengthened by also explicitly recognizing the need for outcomes that actively contribute to ecosystem recovery	This recommendation has been added to the policy gap assessment in Appendix A (Table A-4) and Section 5 (Table 5-1) of the Roadmap for consideration during future rulemaking to update Territorial Sea Plan Part Five.

Name	Comments	DLCD Response
	and long-term resilience, and providing an action item for the state to explore NPI as a framework. The TSP is one avenue for incorporating this framework, or at the minimum analyzing such a framework.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	III. The Roadmap Should Integrate the Broader Climate Context and Comparative Analysis of Energy Options to Support Informed, Balanced Planning and Decision-Making Aligned with the State’s Emissions Commitments. Integrating the climate context into the Roadmap is essential for guiding Oregon’s renewable energy planning in a way that is both informed and balanced. Incorporating a high-level review of comparative analyses of renewable energy alternatives into the Roadmap, alongside the Key Recommendation for the state to conduct its own in-depth analysis (Key Recommendation for Policymakers 10), will provide critical insight into environmental, economic, and social trade-offs that the draft Roadmap does not fully capture. Embedding these assessments will help ensure state decisions align with emissions reduction commitments while advancing a sustainable transition to clean energy.	The introduction to Section 2 (Overview of Offshore Wind Energy Development) has been significantly expanded to discuss the climate context of offshore wind energy and the international studies on offshore wind energy potential to contribute to an energy transition.
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	A. The Roadmap Should Better Reflect the Global, National, and State Specific Climate Context to Guide Informed Renewable Energy Planning. The Roadmap should clearly identify climate change, and the threats it poses to Oregon, as a core purpose of the document within the introduction and throughout. The document lacks a grounding in the scientific consensus published by the Intergovernmental Panel on Climate Change (IPCC) in its third release of its Sixth Assessment Report (AR6) on “Mitigation of Climate Change”: a synthesis of the current understanding of different mitigation pathways to reduce global greenhouse gas (GHG) emissions, which identifies wind energy, including offshore, as a critical solution to addressing the climate crisis.³⁹ The World Economic Forum, as well, finds that offshore wind energy is critically needed to tackle climate change.⁴⁰ Globally, climate change is driving rising temperatures, shifting weather patterns, and increasing the frequency of extreme events, creating urgent pressure to reduce greenhouse gas emissions. Climate change is a primary factor contributing to the alarming global	The introduction to Section 2 (Overview of Offshore Wind Energy Development) has been significantly expanded to discuss the climate context of offshore wind energy and the international studies on offshore wind energy potential to contribute to an energy transition.

Name	Comments	DLCD Response
	biodiversity loss, habitat alteration, and ecosystem instability. International agreements, such as the Paris Agreement, set targets for limiting warming to well below 2°C, encouraging nations to accelerate clean energy transitions. In the United States, while past federal commitments under the Paris Agreement and related climate policies have been rolled back under the Trump Administration, state and local governments, regional coalitions, and private actors continue to advance emissions reduction and renewable energy initiatives. The sweeping rollback of federal climate commitments increases the responsibility on state-level planning, making it even more essential that the Roadmap clearly articulate and emphasize the global, national, and state-specific climate context. Accordingly, we recommend that the Roadmap incorporate that the state’s evaluation of offshore wind energy should be grounded in this broader climate context, particularly at this foundation setting level. We recommend that the Roadmap clearly articulate that the responsible development of renewable energy, alongside other mitigation strategies, plays an important role in addressing the climate crisis. Recent analyses indicate that offshore wind energy is emerging as an increasingly important component of the U.S. electricity system, driven by declining costs and state policy targets. Even amid evolving federal priorities, several states have set ambitious deployment goals and are actively assessing maximum feasible capacities for offshore wind energy. Although offshore wind development to date has largely concentrated on fixed-bottom turbines in shallower waters of the East Coast, the West Coast, particularly off Oregon, features some of the most powerful and consistently strong wind resources in North America.⁴¹ This significance should also be considered as part of the broader context when evaluating offshore wind development and renewable energy transition decisions in Oregon. Oregon should ensure that its planning decisions, whether to participate in offshore wind development or to opt out, are made with full awareness of this national context, so that any choice is deliberate, well-informed, and aligned with both regional energy and climate considerations. We recommend the Roadmap consider and explicitly articulate how each Pathway impacts state, national, and international climate goals.	

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	This analysis supports the core principle of the Roadmap, to be “holistic and accountable,” and should be addressed within each of the Pathway Considerations tables. The Roadmap should also explicitly consider how decisions made under Pathways 1 and 2 may shift the burden of energy generation, and associated environmental and climate impacts, onto other states or regions. Absent in-state development or participation, Oregon will likely remain reliant on imported energy, raising important questions about where that energy is produced, under what environmental standards, and at whose ecological and community expense. This dynamic risks contributing to the creation or perpetuation of “energy sacrifice zones,” where the environmental, public health, and climate burdens of energy production are disproportionately borne by other communities. A truly holistic and accountable assessment should therefore evaluate not only in-state impacts, but also the broader implications of each pathway on regional equity, interstate emissions, and the distribution of environmental harms and benefits.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	B. The Roadmap Should Recommend a Comprehensive Comparative Analysis of Renewable Energy Alternatives that Incorporates Life-Cycle Assessments, Long-Term Climate Projections, and Biodiversity Loss Considerations. We appreciate the incorporation of Key Recommendation for Policymakers 10, to advance the state’s Energy Strategy by evaluating all renewable energy options, including a thorough cost-benefit analysis to determine whether and when different levels of investment in offshore wind energy are prudent.⁴² We support the Roadmap reflecting the need for the renewable energy comparative analysis to be conducted no matter the Pathway chosen, including in no offshore wind development scenarios.⁴³ A successful comparative analysis must include metrics that incorporate not only immediate performance, and cost-benefit analyses, but also temporal (life cycle assessments) and environmental stressors, as well as long-term projections (climate change and biodiversity loss). Without these considerations, there is a risk of selecting solutions that appear environmentally protective in the short term but lead to greater harm over time. For example, a renewable	The recommended dimensions of a comparative analysis have been added to the description of the action in Section 6.2.3.1 (Action: Continue to refine the Oregon Energy Strategy to reflect changing conditions in offshore wind energy technology and the regional energy market).

Name	Comments	DLCD Response
	energy project might minimize immediate land disturbance or emissions, yet its design could exacerbate habitat fragmentation, disrupt migratory species, or be vulnerable to future climate stressors like increased wildfire, drought, or flooding. Over time, these cumulative impacts could outweigh the initial environmental benefits. In contrast, other technologies that may require slightly higher short-term trade-offs, such as more intensive site planning or infrastructure investment, could provide greater energy output while maintaining ecosystem integrity and resilience over the long term, ultimately supporting both climate goals and environmental protection more effectively. This is particularly relevant in the context of offshore wind energy. While avoiding offshore wind development may reduce localized impacts in the near term, a longer term perspective which accounts for climate projections, biodiversity trends, and growing energy demand, suggests that temporary and manageable impacts of well-planned development may be outweighed by broader benefits. These include significant reductions in greenhouse gas emissions and progress toward addressing climate change, which remains a primary driver of biodiversity loss. In particular, short-term impacts may be balanced by long-term gains in reducing greenhouse gas emissions, addressing the overarching problem of climate change, which is itself a major driver of the accelerating loss of biodiversity, and advancing Oregon’s environmental and energy sustainability goals. This approach supports decision-making that considers how technologies will respond to shifting climate conditions, resource limitations, and evolving ecological impacts, steering Oregon toward solutions that are resilient, sustainable, and effective not just in the short term but for decades to come. We recommend that the Roadmap expand on Key Recommendation for Policymakers 10, by requiring that all evaluations of renewable energy options incorporate best available climate projections and biodiversity loss scenarios. Analyses should explicitly assess how each technology contributes to or mitigates long-term risks to ecosystems, species, and ecological function, rather than focusing solely on near-term impacts.	

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	Evaluation frameworks should apply standardized temporal metrics across short-, medium-, and long-term horizons, assessing how performance, environmental effects, and system reliability may change under future climate conditions. Analyses should also account for cumulative and interacting environmental stressors, including climate change, habitat degradation, land-use concerns, ocean conditions, climate disasters, and other stressors. Technologies should be evaluated based on their resilience to those overlapping pressures and their potential to either exacerbate or alleviate ecological strain over time.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	This Roadmap should establish clear criteria for evaluating tradeoffs between near-term environmental impacts and long-term benefits. In addition to cost and energy output, the Roadmap should emphasize how the state can prioritize renewable energy pathways that maintain or enhance ecosystem integrity over time. Finally, we recommend the requirement for comparative cost-benefit analyses on renewable energy to clearly incorporate temporal trade-offs. This transparency will support more informed public engagement and decision-making, particularly where trade-offs between short-term and long-term benefits are complex. The Roadmap should also consider recent advancements in nature-inclusive design opportunities for offshore wind energy, which aim to reduce impacts on marine ecosystems and enhance habitat value. Emerging innovations, such as eco-concrete foundations and turbine structures designed to support marine life, demonstrate that renewable energy development can be compatible with biodiversity objectives when planned responsibly. Incorporating these eco-friendly design options into comparative assessments allows decision-makers to evaluate not only energy output and costs but also long-term ecological benefits and trade-offs, ensuring that renewable energy options are assessed comprehensively.	The recommended dimensions of a comparative analysis have been added to the description of the action in Section 6.2.3.1 (Action: Continue to refine the Oregon Energy Strategy to reflect changing conditions in offshore wind energy technology and the regional energy market). Specific technology considerations are beyond the scope of the Roadmap but may be considered in the evaluation of projects against enforceable policies, including the mitigation hierarchy in the Territorial Sea Plan.

Name	Comments	DLCD Response
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	C. Renewable Energies Comparative Analysis Renewable energy sources are widely recognized as cleaner alternatives to fossil fuels, primarily because they generate little to no greenhouse gas emissions during operation. As a result, they play a crucial role in mitigating climate change, making them more sustainable. However, this does not mean they are entirely free of environmental impact. Each technology has trade-offs across impact categories. Decision-making should consider local resources availability, environmental priorities, and full lifecycle impacts, emphasizing holistic energy planning, not single-metric comparisons. The Roadmap incorporates modeling that forecasts Oregon’s energy consumption could nearly double by 2050 and highlights regional projections, such as the 2019 study estimating a need for 80GW of new solar and wind energy to meet Pacific Northwest greenhouse gas reduction goals.⁴⁴ While this information provides valuable context on anticipated demand and the scale of renewable energy deployment required, the Roadmap does not currently include a discussion of the various renewable energy options or provide high-level comparative analysis between them. Although we recognize that the Roadmap is not intended to provide a full comparative analysis of renewable energy technologies, such an analysis should still be incorporated as part of this foundational framework. Without it, decision-makers lack critical insight into the trade-offs, feasibility, rationale, particularly regarding offshore wind energy, and long-term environmental impacts of alternative technologies. A multitude of studies already exist which compare the various tradeoffs between renewable energy technologies,⁴⁵ and we encourage the Roadmap to, at minimum, compile a review of their findings to be publicly shared, if not conduct a comparative analysis. In addition to a comparison of the lifecycle impacts and cost benefit analysis of each resource, the Roadmap should assess existing in-state capacity and clearly illustrate whether alternative pathways can meet current and projected energy demand and meet climate goals without offshore wind energy. While not discussed here, we recommend that the Roadmap, under	The purpose of the Offshore Wind Energy Roadmap's is to define standards to be considered in offshore wind energy decision-making and related processes. DLCD has decided to not include a high-level comparative analysis of offshore wind energy against other potential renewable energy options. Such an analysis would require substantial additional research and space in the Roadmap document to perform accurately, and DLCD determined that this analysis is more appropriate to be conducted by the state's energy department. Section 6.2.3.1 (Action: Continue to refine the Oregon Energy Strategy to reflect changing conditions in offshore wind energy technology and the regional energy market) recommends additional refinements to the 2025 Oregon Energy Strategy, to further compare renewable energy options across a range of dimensions.

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	Key Recommendations for Policymakers 10, include comprehensive renewable energy comparative analysis that evaluates offshore wind alongside other technologies, such as onshore wind, solar, geothermal, nuclear, hydropower, and marine and hydrokinetic energy, as optional resources for consideration. We support DLCD in determining the full matrix of technologies to be assessed; however, illustrative examples of these resource types should be explicitly incorporated into the Roadmap under this policy recommendation to ensure clarity and completeness. Overall, because offshore wind energy remains relatively nascent in the United States compared to other renewable energy technologies, analyses often group onshore and offshore wind together under the broad category of “wind power.” Oregon’s assessment presents an opportunity to conduct a focused comparative analysis of offshore wind energy specifically on the west coast and could serve as a model and provide valuable insights for other coastal states.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	IV. Oregon Should Ensure Community Engagement and Environmental Justice Measures are Incorporated Throughout All Four Pathways. The Roadmap appropriately highlights the state’s continued regulatory authority following federal CZMA consistency review, including the opportunity to maintain involvement during permitting through enforceable agreements, such as community benefits agreements.⁴⁶ We support the state looking to House Bills 2021 and 4080 Local plans and codes Oregon’s new solar siting rules found in OAR 660-023, which contain requirements for community benefits that could be a model for establishing a similar net community benefit policy for offshore renewable energy. We appreciate that DLCD has committed to seeking the guidance of and centering the needs of historically marginalized communities throughout the development process for the Roadmap, including in outreach, engagement, and Roundtable discussions with affected communities. The Roadmap reflects this extensive engagement with coastal residents, Tribal Nations, fishing communities, community-based organizations, youth representatives, and environmental advocates, encouragingly reflecting a broad set of perspectives in	Thank you for your comment.

Name	Comments	DLCD Response
	shaping the Key Recommendations for Policymakers, Action Items and Strategies. We also recognize that we do not speak on behalf of Tribal Nations; however, based on our understanding, the Roadmap makes meaningful efforts to incorporate Tribal engagement and considerations. We respectfully defer to Tribal Nations regarding their experiences with and perspectives on the Roadmap and its development process. We value that the Roadmap advocates for inclusive and adaptive engagement, illustrating throughout each Pathway where community input opportunities should be incorporated. The Roadmap recognizes the importance of addressing community and workforce agreements, engaging Tribes, and supporting local interests across different Pathways, including in economic participation and development planning.	
Conservation Coalition (National Wildlife Federation, Bird Alliance of Oregon, Oregon Wild, American Bird Conservancy, Surfrider Foundation, Oceana)	A. Community Benefit Agreements We recommend that the Roadmap propose explicitly including the use of CBAs as a standard practice for offshore wind energy projects in Oregon across Pathways 3-4. CBAs should be developed early in the project planning process to ensure meaningful engagement and alignment with community priorities. The Roadmap can recommend that the state derive this authority from either state-level legislation, permitting, or procurement processes to mandate CBAs for federal offshore wind energy projects. The state should, as discussed in Section I, leverage its authority and jurisdiction over land-based grid connections, environmental certifications, and power procurement to incentivize developers to enter into CBAs. We recommend that the Roadmap establish a minimum criteria for CBAs to ensure they deliver measurable community, environmental, and economic benefits. Policies should clarify the scope of agreements, including environmental mitigation and investment in coastal community priorities. CBA's should be adaptive and dynamic agreements that can be updated over time to reflect new data or emerging environmental concerns and changing community needs. Finally, we recommend that the Roadmap explicitly include that CBAs should be tied to permitting and operational approvals, so they are enforceable as part of project conditions.	Thank you for your comment. DLCD believes these suggestions are already reflected in the Roadmap, particularly in Section 6.5.3 (Strategy: Community Agreements as a Formal Part of the Process). While the comment recommends greater specificity be included in the Roadmap, establishing minimum criteria for CBAs, DLCD believes that a broader "net benefit" or "net neutral" standard provides a stronger basis to broadly interpret community benefits across a range of dimensions.

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	Policies should ensure CBAs complement other state priorities, conservation goals, and climate commitments.	
Karie Silva	I. Establish a Defined Statewide Development Cap of 3 Gigawatts The draft Roadmap does not establish a binding upper limit on offshore wind development. A clearly articulated statewide cap of 3 gigawatts (GW) is necessary to: • Provide a measurable ceiling consistent with referenced planning scenarios • Bound cumulative ecological and socioeconomic impacts • Align with Goal 19's precautionary mandate to prevent irreversible damage • Require that any expansion beyond 3 GW undergo renewed statewide cumulative impact review and explicit legislative authorization prior to approval A defined cap functions as a structural safeguard against incremental expansion through phased project approvals. Without it, cumulative impacts risk being evaluated project-by-project rather than at a statewide ecosystem scale. The STAC Offshore Wind Research Report identifies significant Oregon-specific knowledge gaps related to ecosystem modeling, species behavior, and cumulative impacts. Establishing a defined development threshold allows research to meaningfully inform policy decisions before expansion occurs at a scale that materially outpaces scientific understanding. If Oregon intends this Roadmap to guide legislative development, the cap should serve as a democratic checkpoint ensuring that additional expansion occurs only after transparent review, updated science, and affirmative legislative action. The Roadmap itself evaluates offshore wind development scenarios in the range of roughly 2–3 gigawatts when considering infrastructure needs and cumulative considerations. Establishing a defined statewide cap at this level aligns policy with the planning scale already analyzed and ensures that expansion beyond this threshold undergoes renewed statewide review and legislative authorization. Codifying this threshold through rulemaking would strengthen Oregon's enforceable framework during CZMA Federal Consistency	Thank you for your comment. While the conversations among the advisory Roadmap Roundtable did not reach consensus on whether the state should formally establish a cap on the maximum amount of offshore wind energy development it is willing to consider, the callout box identified in Table 4-7 in Section 4.4.1 (A Pathway Focused on Increased Energy Production, Climate Change Mitigation, and Job Creation) of the Roadmap describes how a cap may provide assurance to fishing communities and others concerned about the possible scale of development effects. The discussion in the Roadmap is intended to support and inform any policy discussions that may occur in the legislature.

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	review and preserve meaningful public oversight of future expansion decisions.	
Karie Silva	II. Recognition of Documented Coastal Constituent Input In November 2024, both Coos County (Measure 6-219) and Curry County (Measure 8-116) placed advisory questions before voters regarding whether county officials should formally oppose floating offshore wind development in adjacent federal waters. While advisory, these measures represent documented expressions of coastal constituent concern within jurisdictions most directly affected. Acknowledging these measures enhances transparency and strengthens the legitimacy of future coastal planning decisions.	Thank you for your comment. Section 2.4 (Oregon Offshore Wind Energy Permitting Process and Roles) of the final Roadmap includes a subsection dedicated to the local government role in the offshore wind energy regulatory process. Within this new section, additional information has been included about the 2024 local referenda in Coos and Curry Counties.
Karie Silva	III. Science-Triggered Halt Standards (Including EFH Protections) Monitoring without enforceable response mechanisms is not protective. To remain consistent with Goal 19, ORS 506.109, and the Magnuson-Stevens Act, Oregon should codify measurable halt triggers tied to: • ESA-listed species injury or mortality • Behavioral displacement affecting feeding or migration • Seabird collision thresholds • Fisheries displacement benchmarks • Essential Fish Habitat (EFH) disturbance indicators • California Current productivity metrics Where monitoring demonstrates adverse impacts to EFH, spawning habitat, or designated renewable resources, activities should be subject to mandatory reassessment, modification, or suspension. While the Roadmap emphasizes adaptive management and research alongside development, the STAC Offshore Wind Research Report identifies substantial Oregon-specific knowledge gaps that will require sustained, multi-year research efforts. Establishing clear thresholds and bounded development scales ensures that policy decisions remain responsive to emerging scientific understanding. Section 6.8 appropriately calls for development of an offshore wind research agenda; however, research findings must be tied to defined protective actions. Monitoring must trigger measurable thresholds and mandatory reassessment criteria to ensure that documented impacts result in enforceable corrective measures—not discretionary	Section 6.3.2.7 (Action: Define a framework for monitoring and adaptive management specific to offshore wind energy development) of the Roadmap states: <i>In addition to requiring ongoing monitoring, reporting, and collaboration, the state should require clear response and accountability measures in the Adaptive Management Plans required in Territorial Sea Plan Part Five. These measures should be triggered if monitoring reveals unanticipated effects from project operation compared to the expected conditions. Environmental monitoring thresholds should include clear triggers that temporarily or immediately halt operation when necessary to protect sensitive wildlife.</i>

Name	Comments	DLCD Response
	evaluation. Without predefined suspension standards, Oregon risks documenting degradation without corrective authority.	
Karie Silva	IV. Protection of Commercial Fishing Grounds, Essential Fish Habitat, and Renewable Food Resources Oregon’s commercial fisheries are renewable marine food systems protected under ORS 506.109, Statewide Planning Goal 19, and Oregon’s Territorial Sea Plan. Many species harvested off Oregon are managed pursuant to federal Fishery Management Plans under the Magnuson-Stevens Act, which mandates protection of Essential Fish Habitat (EFH). These fisheries represent long-standing renewable ocean uses that depend on stable habitat conditions and continued access to historic fishing grounds. EFH includes habitat supporting: • Dungeness crab • Pacific pink shrimp • Rockfish, sablefish, sole, and other groundfish complex species • Forage species critical to marine food webs Floating offshore wind infrastructure represents long-term industrial occupation of benthic and midwater space and may fragment, alter, or functionally exclude EFH-designated areas. Displacement from historic fishing grounds may constitute functional habitat loss affecting federally managed fisheries. To ensure compliance with state and federal law, the Roadmap should establish: • Spatial exclusion zones for spawning and breeding habitat • Protection of benthic substrate critical to crab, shrimp, and groundfish species • Defined cumulative displacement thresholds within EFH • Mandatory reassessment if harvest declines correlate with project footprint • Recognition of commercial fishing as a priority renewable ocean use under Goal 19 and ORS 506.109 Loss of access to EFH and historic grounds may impair Oregon’s renewable marine food supply.	In Section 6.6.3.3 (Action: Amend state fishery use protection standards to apply more broadly to environment types rather than specific geographic areas), additional language has been added to the discussion of exclusionary policy amendment recommendations to include the habitat types mentioned, account for and define cumulative displacement thresholds in EFH, and adaptive management triggers if harvest declines over time correlate with a project's spatial area.

Name	Comments	DLCD Response
Karie Silva	A. Cumulative Essential Fish Habitat Fragmentation The Roadmap should explicitly address cumulative EFH fragmentation resulting from multiple turbine arrays, anchor systems, and cable corridors. Aggregated infrastructure may: • Fragment continuous habitat • Alter benthic communities • Reduce effective EFH availability • Functionally exclude mobile gear fisheries Cumulative fragmentation can impair habitat function even absent direct mortality. Statewide EFH cumulative impact thresholds should be established prior to expansion beyond the 3-GW cap.	Cumulative EFH fragmentation has been added to Table A-4 in Appendix A (Enforceable Policy Assessment) as an "effect detail". Language was also added to Section 6.3.2.3 (Action: Clarify the timing of a cumulative impact assessment and other information needs before leasing and permitting).
Karie Silva	V. Stakeholder Protection, Tribal Sovereignty, and Enforceable Benefit Agreements The Roadmap references stakeholder engagement and community benefit agreements but does not establish enforceable standards ensuring protection of legally recognized uses, rights, and sovereign interests. Benefit agreements must not function solely as financial mitigation tools. Community Benefit Agreements should include enforceability standards, transparent reporting, binding dispute resolution, and long-term accountability to protect fishing access and operational viability.	DLCD agrees with the point that community agreements should not function solely as financial mitigation tools. The section in the Roadmap focused on Community Agreements (Section 6.5.3, Community Agreements as a Formal Part of the Process strategy) includes as a core tenet that: "Community agreements need not be just financial in nature and may include other types of agreement such as: a. Protective measures; b. Prescriptive mitigation actions; c. Monitoring actions; d. Behavioral agreements (e.g., engagement, data sharing, response to harm); e. Investments in infrastructure, human capacity, or other community needs; f. Revenue sharing agreements; g. Information access agreements (related to enforcement); h. Emergency response notification, processes, and procedures; i. Liability agreements." The section also recognizes that, "Community benefit agreements are not intended to solve all potential effects of offshore wind energy development. Some effects may only be able to be addressed through avoidance." The Roadmap section focused on protection of fisheries (Section 6.6.3, Protect and Maintain Optimum Management and Uses of

Name	Comments	DLCD Response
		Oregon’s Fisheries strategy) further emphasizes the potential role of fisheries compensation agreements to mitigate effects when necessary, but it recognizes the mitigation hierarchy in state policy as a model and the importance of effect avoidance and minimization before compensation.
Karie Silva	A. Protection of Commercial Fishing Access The Roadmap should require that: • Fishing access and transit corridors be preserved to the maximum extent practicable • Fisheries benefit agreements include enforceable access protections • Dispute-resolution mechanisms be binding and transparent • Compensation be tied to documented loss of access, productivity, or EFH impairment • Agreements be incorporated as enforceable conditions under CZMA Federal Consistency determinations where appropriate Oregon retains authority under the Coastal Zone Management Act to condition or object to federal activities that are inconsistent with enforceable state coastal policies, including protections established in the Territorial Sea Plan and Goal 19. Financial mitigation does not replace lost fishing grounds.	Details have been added to Section 6.6.3.7 (Action: Support and require fisheries compensation agreements as necessary to mitigate effects) to include the mentioned items as examples of mitigation actions that should be pursued before compensatory mitigation, with the goal of avoiding, minimizing, or offsetting adverse effects to fishing communities.
Karie Silva	B. Tribal Sovereignty and Cultural Resource Protection Tribal Nations possess sovereign rights, treaty-reserved interests, and longstanding relationships with marine resources. The Roadmap should affirm that: • Consultation occurs early and continuously • Traditional Ecological Knowledge (TEK) is incorporated with Tribal consent • Cultural resource protections extend to submerged lands and associated areas where applicable • Agreements respect government-to-government structures • Projects should not proceed where consultation identifies material impairment of Tribal treaty-reserved rights or protected cultural resources Protection of Tribal rights is a legal and sovereign obligation.	Thank you for your comment. The Roadmap in Section 6.4 (Protect Tribal Cultural and Archaeological Resources, Culturally Significant Viewsheds, Subsistence Activities, and other Interests of Tribes) contains an extensive set of recommended actions and policies to support Tribal involvement in offshore wind energy decision-making, including the use of traditional knowledge, protection of data sovereignty, Tribal involvement in ground disturbing activities, Tribal policy coordination with similar state policies, and Tribal engagement with the state, federal agencies, and developers.

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Karie Silva	VI. Precautionary Thresholds During Mapping and Site Characterization Mapping and site characterization activities may disturb ESA-listed species and Essential Fish Habitat prior to full project authorization. Precautionary safeguards should therefore apply during the earliest stages of offshore wind development to prevent incremental cumulative harm. Precautionary measures should include: • Acoustic exposure ceilings for survey equipment • Seasonal avoidance windows during sensitive migration, breeding, and spawning periods • Spatial exclusion buffers around sensitive habitats and ecological hotspots • Real-time shutdown authority when protected species are detected Early-stage activities should be conducted under clearly defined precautionary standards.	A new section, Section 2.4 (Oregon Offshore Wind Energy Permitting Process and Roles) has been added to the Roadmap, which describes the conditions the state placed on its concurrence with the proposed BOEM leasing action in 2024. These conditions were based on existing enforceable policies (e.g., the Territorial Sea Plan and Statewide Planning Goal 19) and included provisions such as spatial exclusion buffers and shutdown procedures when protected species are detected. The 2024 decision also excluded consideration of high-energy survey equipment (e.g., air guns or water compression devices that produce acoustic energy), and through discussions with BOEM, the OCMP clarified the process BOEM uses during survey plan reviews to verify that the use of low-energy equipment (e.g., sonar, sub-bottom profilers, sparkers) verifies that the maximum disturbance distance to mammals and sea turtles will not exceed the reasonable maximum observational distance of Protected Species Observers on vessels. In the Roadmap, the policy gap assessment in Section 5 (Enforceable Policy Assessment: Addressing Objectives and Seizing Opportunities) includes considerations for post-lease survey activities and reassessment of the TSP's ecological resources protection standards to consider inclusion of additional protections such as seasonal avoidance windows.
Karie Silva	VII. Ecosystem-Level Safeguards – California Current The California Current upwelling system underpins Oregon's marine productivity and supports the state's commercial fisheries and broader marine ecosystem. Offshore wind development planning should incorporate ecosystem-level monitoring indicators to ensure development proceeds in a manner consistent with the long-term resilience of this highly productive ocean system. The STAC Offshore Wind Research Report identifies ecosystem modeling, trophic interactions, and cumulative ecosystem effects as priority research areas, reinforcing the importance of integrating ecosystem-scale monitoring into offshore wind planning and decision-making. Ecosystem monitoring should include indicators such as: • Forage-base availability and distribution	The recommended ecosystem monitoring indicators have been included in Section 6.3.2.7 (Define a framework for monitoring and adaptive management specific to offshore wind energy development)

Name	Comments	DLCD Response
	• Ocean productivity benchmarks associated with upwelling cycles • Trophic-structure indicators reflecting predator-prey relationships • Regional ecosystem variability associated with climate and oceanographic conditions Because Oregon’s fisheries and marine food webs are closely linked to California Current productivity patterns, monitoring programs should evaluate potential cumulative ecosystem effects associated with large-scale offshore wind development. Where ecosystem indicators demonstrate measurable degradation relative to established baselines, development activities should be subject to reassessment and adaptive management measures consistent with Oregon’s precautionary ocean management policies. Integrating ecosystem-level monitoring into offshore wind planning will help ensure that renewable energy development proceeds in a manner compatible with the long-term health of Oregon’s marine ecosystem.	
Karie Silva	VIII. Enforceable Decommissioning and Financial Assurance Standards Offshore wind infrastructure represents long-term industrial occupation of public ocean space. Decommissioning standards must be defined at the outset—not deferred. Oregon retains independent authority under the Coastal Zone Management Act to condition or object to federal activities inconsistent with enforceable state policies. Decommissioning standards should therefore be incorporated as enforceable conditions in any state concurrence under CZMA Federal Consistency review. Oregon should require: • Full removal of turbines, anchors, cables, and associated infrastructure • Defined “as-left” seabed restoration criteria consistent with EFH protection standards • Prohibition on partial abandonment absent demonstrated ecological benefit • Inflation-indexed financial assurance sufficient to cover full removal and restoration costs • Periodic bond reassessment throughout the project life • Financial assurance posted prior to construction and maintained	Changes have been implemented in Section 6.3.2.9 (establish clear decommissioning expectations) to address this comment, though many of the recommendations are already reflected.

Name	Comments	DLCD Response
	through restoration verification • Bond holdback pending independent confirmation of ecological recovery Financial assurance mechanisms must account for bankruptcy risk, ownership transfer, and project underperformance. The public trust should not bear long-term removal costs for private industrial infrastructure.	
Karie Silva	If Oregon authorizes offshore wind development, it should proceed within a legally durable framework that: • Establishes a 3-GW statewide cap with legislative authorization required for expansion • Codifies enforceable science-triggered reassessment standards • Protects EFH and spawning grounds • Prevents cumulative habitat fragmentation • Safeguards commercial fishing access and renewable food systems • Respects Tribal sovereignty • Incorporates enforceable stakeholder agreements • Applies precaution from mapping through decommissioning • Exercises Oregon’s CZMA authority to ensure consistency with enforceable state policies	Thank you for your comments. Responses to each of these recommendations are addressed separately above.
Curry County Executive Response to DLCD - Offshore Wind Roadmap	However, Curry County believes that several critical elements necessary for responsible decision-making remain insufficiently addressed. In particular, the Roadmap should incorporate stronger requirements regarding: 1. financial transparency and lifecycle economic impacts 2. state enforcement of community protection standards 3. binding protections for coastal industries and ecosystems 4. recognition of local community decisions	Responses are provided to each individual recommendation.
Curry County Executive Response to DLCD - Offshore Wind Roadmap	1. Financial Transparency and Lifecycle Cost Disclosure A major gap in the current Roadmap is the absence of a requirement for comprehensive financial disclosure by project developers. Offshore wind development represents one of the most capital-intensive forms of energy infrastructure currently under consideration in the United States. The total lifecycle costs of such projects extend far beyond turbine installation and include: • offshore construction and anchoring systems • undersea transmission infrastructure	A new action has been added to Section 6.2.3 (Strategy: Improve Understanding of Offshore Wind’s Potential Benefits and Costs for Oregon to Clarify Investment Decisions) the recommends any developer proposing offshore wind projects subject to Oregon review should be required to provide a clear and granular lifecycle financial assessment, consistent with this comment.

Name	Comments	DLCD Response
	• onshore substations and grid interconnections • port infrastructure upgrades • maintenance and vessel operations • environmental monitoring • decommissioning and seabed restoration In many jurisdictions worldwide, the long-term economic viability of offshore wind projects has depended heavily on: • public subsidies • tax incentives • ratepayer surcharges • transmission cost allocation For this reason, the Roadmap should require that any developer proposing offshore wind projects in Oregon waters provide a clear and granular lifecycle financial assessment. This assessment should transparently describe: • Total project cost • Expected public subsidies (included public costs for “developer provided community benefits” • Expected taxpayer exposure • Anticipated impacts on electricity rates • Transmission and storage infrastructure costs • Public infrastructure requirements and costs • Expected decommissioning costs • Financial risk in the event of equipment failure or early project termination Such analysis must be presented in a form that allows ratepayers and taxpayers to clearly understand the financial consequences of project approval over the entire lifecycle of the project. Without this transparency, policymakers and the public cannot meaningfully evaluate whether offshore wind development represents a net economic benefit or burden.	

Name	Comments	DLCD Response
Curry County Executive Response to DLCD - Offshore Wind Roadmap	2. State Enforcement of Local Community Protection Standards The Roadmap recognizes the importance of community engagement and local perspectives. However, Curry County believes the document should go further in recognizing the role of local decision-making. In Curry County, voters have clearly expressed concerns regarding offshore floating wind turbine development through a county-level referendum. While offshore waters fall under federal jurisdiction, the State of Oregon retains an important role in evaluating the compatibility of offshore wind development with coastal communities. For this reason, Curry County recommends that the Roadmap establish a policy principle that: Protection and mitigation standards reflected in county-level referenda should be incorporated into state project evaluation processes. Under this framework: • Oregon State agencies would evaluate whether proposed projects satisfy the protection and mitigation standards reflected in local referenda. • If those standards cannot be met, the State should halt further project consideration. Such an approach ensures that community protections are meaningful and not merely advisory.	Thank you for your comment highlighting the importance of a strong local community role in offshore wind energy decision processes. In response to this and other comments, a new subsection has been added to Section 2.4.2 (Oregon Regulatory Framework for Offshore Wind Energy Project Reviews) that focuses on local government policies and authorities in the regulatory process. This section affirms the strength of local government enforceable policies in federal consistency reviews and the state's process for consulting local government subject matter experts, reinforces the need for local permits and authorizations where applicable, and discusses the community directives and applicability challenges associated with the 2024 referenda in Curry and Coos Counties. The section also makes a connection to the section of the Roadmap that discusses the potential role of community agreements accompanied by a state community well-being policy, and how this recommended framework may provide local communities a new meaningful role in shaping offshore wind energy decisions. The county-level referenda have also been included in the "Oregon Overview" discussion in Section 2.2.
Curry County Executive Response to DLCD - Offshore Wind Roadmap	3. Protection of Fisheries and Coastal Economies Commercial and recreational fisheries represent one of the most important economic sectors along the southern Oregon coast. The Roadmap appropriately identifies fisheries interactions as a key issue. However, Curry County believes stronger policy commitments are necessary. Future project evaluations should require: • comprehensive fisheries displacement analysis • cumulative impact assessment across multiple projects • enforceable mitigation and compensation mechanisms • meaningful participation of fishing communities in project review Fisheries protection must be treated as an essential economic consideration rather than a secondary mitigation issue.	Thank you for your comment. DLCD agrees that the Roadmap should contain strong policy and action recommendations to involve and protect fishing communities in state decision processes related to offshore wind energy development. Among the recommendations in the Roadmap are: - A recommendation to require fisheries compensation agreements as applicable based on project effects (Section 6.6.3.7, Support and require fisheries compensation agreements as necessary to mitigate effects action). This section has been expanded to further describe how the state would approach fisheries mitigation agreements, supported by technical evaluations of fishery value and fishery effects from a project. - State policies in Territorial Sea Plan Part Five already require a cumulative impact assessment as part of an offshore energy permit

Name	Comments	DLCD Response
		review, and the Roadmap goes a step further to recommend a cumulative impact analysis at the leasing stage as well. The final cumulative assessment would require consideration of multiple projects. - Section 6.5 (Support Coastal and Regional Communities) of the Roadmap describes a set of recommendations that would allow the establishment of enforceable mitigation and compensation mechanisms for affected fishing communities as well as other affected communities. These include recommendation of a new community well-being policy, information about community needs and impacts to support community agreement negotiations, contractual mechanisms to provide enforceability over time, and the aforementioned compensation mechanism if other mitigation options are not sufficient. The Roadmap also recommends a state-led marine spatial planning inventory process, preceding future federal leasing, which could be a venue to identify important areas to fishing communities and recommend their avoidance. - The Roadmap recommends inclusion of fishing communities in scientific collaboration work and marine spatial planning, as well as the formation of an offshore wind energy fisheries working group to support the development of memorialized agreements between fishing communities and developers. Language has been added to this recommendation to suggest that this group could also serve as a venue for the state to seek fishing community perspectives on proposed projects during federal consistency reviews and the review of other relevant permits or authorizations. Finally, the Roadmap provides recommendations around how the state can sustain ongoing engagement with fishing communities by supporting existing or new fishing community groups (e.g., FACT, FINE, SOORC) focused on marine energy.

Name	Comments	DLCD Response
Curry County Executive Response to DLCD - Offshore Wind Roadmap	4. Decommissioning and Long-Term Financial Responsibility Offshore wind turbines have operational lifespans typically ranging between 15 and 30 years. At the end of this period, turbines, anchors, cables, and associated infrastructure must be safely removed and the seabed restored. To prevent future public liability, the Roadmap should require developers to establish financial assurance mechanisms sufficient to cover: • full decommissioning costs • seabed restoration • removal of transmission infrastructure • long-term environmental monitoring These financial guarantees should remain in effect throughout the operational life of the project.	Section 6.3.2.9 (Action: Establish clear decommissioning expectations and require adequate financial assurance at the permitting phase) discusses decommissioning expectations and a recommendation to require adequate financial assurance at the permitting phase. The specific elements described in the comment have been added to the recommendation as guidance for what factors the state should consider when seeking evidence that the financial assurance mechanisms are sufficient to cover decommissioning costs.
Curry County Executive Response to DLCD - Offshore Wind Roadmap	5. Ensuring Oregon Residents Benefit from Oregon Waters If offshore wind projects are developed in Oregon waters, the resulting energy generation should provide direct benefits to Oregon residents. Policies should therefore ensure that offshore wind energy is integrated into the Oregon electrical grid rather than primarily exported to other states. Without such safeguards, Oregon communities could bear environmental and economic risks while receiving limited direct benefit.	Thank you. DLCD believes the recommended action in Section 6.2.2.3 (Action: Consider a policy that would require offshore wind energy in Oregon to connect to Oregon’s coastal grid) addresses this comment.
Audubon California	Overall, Audubon strongly encourages Oregon, and all states developing OSW, to: (1) develop and fund necessary science, research, and monitoring programs necessary to identify and manage risks to birds; (2) avoid or, if necessary, fully mitigate impacts to birds, other wildlife, and ecosystems and provide net conservation benefits where feasible; (3) staff and fund agencies to adequately implement and regulate OSW; and (4) cultivate and maintain meaningful collaboration across agencies, communities, Tribes, and other interested parties.	Thank you for your comments. Responses to each of these recommendations are addressed separately below.

Name	Comments	DLCD Response
Audubon California	1. Audubon recommends active coordination with communities, other states, the federal government, and Tribes. Audubon appreciates that the Roadmap emphasizes inclusivity and input from communities, agency partners, NGOs, industry, and Tribes throughout the document. The kind of meaningful engagement described in Section 3.2.1 requires significant commitments in staff capacity and expertise.	Thank you for your comment.
Audubon California	a. Oregon should invest in staff and expertise to support robust engagement. Complex public processes are improved by a collaborative approach that actively invites and incorporates input from multiple interested parties. Audubon encourages that the Roadmap explicitly recommend the budgeting of adequate funding to support meaningful collaboration, regardless of which pathway is ultimately pursued. This may require additional funding to support local governments, tribal governments, and perhaps community-based organizations that lack adequate resources to meaningfully engage in the process. While the Roadmap discusses some aspects of capacity needs, it could be improved by being explicit regarding capacity needs to ensure meaningful community engagement and appropriate collaboration with tribal governments.	Thank you for your comment. In response to this comment and similar comments from others, a new action has been added to Section 6.1 (Effective and Meaningful Engagement with Affected Communities), recommending that the state create a community engagement capacity support fund.
Audubon California	b. Oregon should engage in the West Coast Science Collaborative. Audubon strongly encourages Oregon to participate in the West Coast Science Collaborative (WCSC), currently being organized by the State of California. Audubon was active in the development of the Regional Wildlife Science Collaborative on the East Coast and appreciates the capacity a regional science entity can provide to help prioritize science needs and funding to improve OSW outcomes. Moreover, Oregon can leverage participation in the WCSC to avoid duplicating efforts and to integrate into broader research and monitoring efforts, including geospatial analyses and modeling.	Thank you for your comment. The Roadmap recommends participation in the West Coast Science Collaborative or a similar regional scientific collaboration body in Section 6.3.2.4 (Action: Participate in a regional offshore wind energy science collaborative).

Name	Comments	DLCD Response
Audubon California	2. Science, research, modeling, and monitoring must be prioritized and funded. Audubon appreciates that the Roadmap acknowledges that Oregon “needs better data before it can make responsible decisions about offshore wind energy.” (Roadmap, p. 32). The Roadmap should emphasize initial investments in analyzing existing data, which will provide some baseline information, provide early assessments for risks and high-conflict areas, and identify knowledge gaps to guide future studies. Audubon also recommends that Oregon conduct the necessary marine spatial planning (MSP) exercises for each future scenario identified in the Roadmap. MSP will provide valuable information for future management of Oregon’s waters, regardless of whether OSW is developed, and will inform revisions to Oregon’s Territorial Sea Plan. Conducting the necessary science, monitoring, and modelling to understand the potential ecological impacts from individual projects, and all projects cumulatively, will require significant new investments and cannot be accomplished by retasking existing staff or funds. The Roadmap would be improved by specifically identifying the challenge of funding science and monitoring and proposing potential solutions, or recommending further study, to meet those needs.	Consistent with this comment, the recommendation for MSP in the revised Roadmap is not limited to only those pathways that pursue offshore wind energy development.
Audubon California	3. Impacts to wildlife and ecosystems must be adequately studied, monitored, and mitigated for the lifetime of the projects. As the Roadmap acknowledges, the impacts of offshore wind development off of the West Coast are unknown. Audubon supports a cautious approach to development that, in part, makes best efforts to identify least-risk areas, measure impacts, and fully mitigate them. This approach is more likely to reduce conflicts over project siting, result in fewer ecological impacts, and provide more certainty for developers and power purchasers.	Section 6.3 (Protect the Environment and Species (Marine, Terrestrial, Estuarine, Freshwater)) of the Roadmap presents a comprehensive uncertainty and risk management strategy that combines Oregon's precautionary stance toward offshore renewable energy development, the mitigation hierarchy established in ocean policy, a regional perspective on cumulative impact assessment, and mechanisms for ongoing adaptive management and monitoring with enforceable accountability measures. Together, DLCD believes the Roadmap achieves the intent of this comment.

Name	Comments	DLCD Response
Audubon California	a. The Roadmap would be improved by recommending more strategic and innovative investments to improve on traditional approaches to mitigation. Traditional approaches to environmental mitigation regularly fail to adequately offset direct and cumulative impacts on wildlife or ecosystems from human activities. Audubon also recommends that Oregon and other interested parties explore novel mitigation strategies that focus on offsetting cumulative impacts from multiple projects, rather than a project-by-project approach that results in piecemeal mitigation. Rethinking traditional mitigation frameworks may ultimately require changes in regulations or law. This approach may be especially important for seabirds that may be affected by OSW, since effective mitigation measures for seabirds may require policies or programs in countries or jurisdictions thousands of miles away from projects. Seabirds are also good candidates for benefiting from a “Net Positive Impact” approach,⁵ where the net positive outcomes from a project outweigh the adverse environmental impacts.⁶ The NPI approach takes into account direct and cumulative impacts, but also the benefits of specific mitigation measures and contributions to overall climate and conservation goals. It can encourage development of innovative and collaborative mitigation measures. The approach need not result in significant increases in project costs and can go a long way in allaying concerns of those opposed to OSW because of perceived or actual environmental impacts. When coupled with assurances for regulated entities, it can create more certainty regarding costs associated with development and operation of a project.	The NPI approach has been added to the Enforceable Policy Assessment in Appendix A (Table A-4) and the gap summary table in Section 5 (Table 5-1) as a policy recommendation for consideration in future rulemaking. The policy assessment also recommends the development of guidance on mitigation methods and strategies to address effects of energy development in the marine environment, which can help to guide future project reviews.
Audubon California	b. Adaptive mitigation must include clear thresholds and actions. Audubon strongly supports the recommendation that OSW be accompanied by the establishment of “adaptive management plans and accountability measures for long-term impacts.” (Roadmap, ES-6). Too often, adaptive management is presented as delayed mitigation, or a future promise ostensibly triggered by a vague threshold. Audubon recommends that adaptive management plans be developed early in the project development process and include binding, enforceable specific actions once thresholds are exceeded.	Section 6.3.2.7 (Action: Define a framework for monitoring and adaptive management specific to offshore wind energy development) has been revised consistent with this and other similar comments to describe an adaptive management approach that includes clear thresholds and triggers for reassessment and mitigation actions.

Name	Comments	DLCD Response
Audubon California	4. The Roadmap should more clearly identify the staffing and funding gaps needed to execute the Pathways. a. Success of OSW in Oregon will depend in part on increasing agency staff capacity. Many state natural resource agencies struggle to meet their current mandates with existing staff and stagnant or shrinking budgets.⁷ In Oregon and elsewhere, successful implementation of OSW will require new investments in staff and expertise at state agencies, local governments, and tribal governments. Key Recommendation for Policymakers 6 calls for increased capacity and expertise within certain entities to be “ready” for OSW development. The added capacity identified in the Roadmap are not just “nice to have” options. As Appendix B states, surveyed groups “indicated that current staffing levels are generally insufficient to handle...one project, and certainly not two running simultaneously.” (Roadmap, Appendix B, p. 83). In other words, Oregon will not meet its renewable, climate, and biodiversity goals in a well-planned, inclusive, and timely manner without new, adequately resourced staff. Adding agency capacity in a time of budget constraints is extremely challenging. Oregon would be better served in identifying these crucial needs sooner so it can approach future budgeting appropriately or identify where its lack of staff capacity may hold up OSW or other processes. The Roadmap acknowledges that its initial needs assessment of agency and Tribal capacities is limited and that a more detailed and accurate financial assessment will be necessary at a later date. (Roadmap, p. 102). Audubon recommends that the Roadmap be improved by explicitly calling for an immediate detailed study of the staffing capacity needs and associated costs.	No change has been made to the Roadmap. The capacity assessment in Appendix B was developed through collaboration with state agency partners, local governments, and Tribes and represents the best estimate available at this time based on outreach to agency partners and Tribes.

Name	Comments	DLCD Response
Audubon California	b. Oregon should consider innovative methods for funding staff, science, and other needs related to OSW development. The costs to responsibly develop OSW can reasonably be integrated into the overall costs of OSW development. The Roadmap should consider ways to generate these revenue streams, including through permit requirements or power purchase agreements. Experiences from OSW development and procurement on the East Coast provide several examples for how Oregon, and partner states like California and Washington, may use their procurement processes to fund necessary monitoring, research, and mitigation. California is currently in the early phases of developing its procurement standards for OSW, which may eventually provide lessons learned that could be applied in Oregon.⁸	Additional information has been added to Section 6.2.2.1 (Action: Explore potential economic incentives, energy planning policies, procurement frameworks and authorities, or other amendments to Oregon energy policy that might attract and facilitate long lead-time resources, such as offshore wind energy) to discuss the potential benefits of a state-led power procurement model that could include contract requirements such as research funding. Unfortunately, as the Government Capacity Assessment shows, the need for agency staff capacity and resources begins well before the permitting stage of an offshore wind energy project and would persist through the operations phase into decommissioning. It is likely that the capacity need would be incompatible with the timing of when that need could be fulfilled through a formal permit review process.
Michael Szumski	While the idea of wind energy as an alternative to fossil fuels is attractive, I have concerns related to how OSW development has been pursued by the Bureau of Ocean Energy Management (BOEM) in Oregon. BOEM’s selection of the two Wind Energy Areas (WEAs) off the Oregon Coast cannot be justified from the results of their seabird density model (Leirness et al. 2021) due to improper study design and small sample size (Adams et al. 2014), resulting in significant model uncertainty (Andrean et al. 2023). BOEM’s estimate of seabird density along the Oregon Coast (Leirness et al. 2021) was based upon a series of systematic surveys spread 27.8 km (17.3 mi) apart, extending from shore to the 2000 m isobath (Adams et al. 2014). The surveys were conducted three times per year (winter, summer, fall) for two consecutive years. This approach did not adequately sample available seabird habitat either spatially or temporally, and represents only a brief snapshot in time (Adams et al. 2014). Adams also acknowledges that the short duration surveys result in high variability, have a limited capacity for repeatability, and are subject to biases from pre-selected track-lines and differences in species detectability (Adams et al. 2014). As a result of these limitations, it is impossible to reach defensible conclusions about the distribution and density of seabirds along the Oregon Coast.	Thank you for your comment. As of July 2025, the two wind energy areas identified by BOEM in 2024 have been rescinded. The Roadmap starts from an assumption that these areas are not the presumed location of an offshore wind project but rather anywhere off the coast of Oregon could potentially be selected for development. DLCD acknowledges that there were concerns from interested communities and environmental groups regarding the areas selected by BOEM and the information that supported the selections. To address these concerns, the Roadmap in Section 6.3.2.1 (Action: State-led spatial planning inventory of marine and coastal zones to inform federal siting and Territorial Sea Plan updates) recommends that the state lead its own marine/coastal spatial planning inventory process ahead of a prospective return of federal interest in leasing the Outer Continental Shelf for offshore wind energy exploration. Through this recommended process, the state would be better positioned to identify areas of value relative to state enforceable policies, which in turn may influence future federal siting processes. The information you provided may be a helpful input to that process if it proceeds, or else contributes useful information to state technical reviews if the same areas are proposed again in the future. This information may also prove valuable as the state identifies research and data needs to support a state-specific offshore wind energy science agenda and an offshore wind science collaborative (Section 6.3.2.2, Develop and

Name	Comments	DLCD Response
		pursue an offshore wind energy research agenda for Oregon action and Section 6.3.2.5, Establish a research collaborative to build Oregon-specific scientific consensus around offshore wind energy research and science needs action).
Michael Szumski	In addition, the Adams study and Leirness model did not identify known hotspots of high seabird density such as Heceta, Perpetua and Stonewall Banks, Heceta Valley, or the broad area of high seabird density found up to 40 km west and 80 km south of Cape Blanco (Audubon 2026, Ainley et al. 2005) where seabird distribution and density fluctuate in response to ever changing patterns in upwelling. These hotspots are known for their high biological activity fueled by seasonal upwelling. The upwelling brings nutrients from the depths into the euphotic zone, resulting in high abundance of phytoplankton, zooplankton, fish and invertebrate prey, which in turn attracts large concentrations of seabirds (Sydeman et al, 2012, Nur et al. 2011, Ainley et al. 2005). Unfortunately, none of these hotspots were sampled adequately, resulting in BOEM's placement of the Coos Bay WEA immediately adjacent to Heceta Bank, one of the most biologically rich and productive areas of its kind on the U.S. west coast (Ainley et al. 2005). See: https://www.youtube.com/watch?v=7hk-PsG3Lbo for a video on the importance of Heceta Bank to marine resources in Oregon. Garthe et al. (2025) demonstrated that loons were displaced from important habitat when wind farms were located adjacent to those areas. The location of the Brookings WEA is also problematic. It was located in the Cape Blanco Nearshore Ocean Important Bird Area (IBA), a region known for high concentrations of seabirds that move in response to shifting patterns of upwelling (Audubon 2026, Ainley et al. 2005). Problems with the Leirness model were recognized by the Pacific Seabird Group (PSG), a professional society of nearly 500 researchers and managers having expertise in seabirds across the Pacific, including direct knowledge of seabirds along the Oregon Coast. In their comment letter to BOEM, PSG states "...the limitations of the analysis presented by Leirness et al. (2021), which was used as the basis for the spatial suitability analysis, must be addressed. The authors acknowledge that survey effort was uneven geographically and	Please see the general response to this comment above.

Name	Comments	DLCD Response
	temporally, which affected the uncertainty of the modeling.” (Andrean et al. 2023). The letter continues “PSG recommends that the data gaps causing high levels of uncertainty in the suitability analysis be filled using a combination of direct visual observations, radar studies focused on migratory movements, and individual tracking data in order to more accurately predict the impacts of offshore wind energy projects and develop methods for mitigation.” Finally, the PSG letter states “... we strongly recommend that BOEM plan for standardized before-after control impact or before-after gradient studies to detect changes in seabird distribution and abundance at the WEAs or eventual lease sites.”	
Michael Szumski	The need for the collection of pre/post construction abundance and distribution data, and the need for additional research on vulnerable species was reiterated in letters to BOEM from a wide array of organizations with expertise in seabirds and marine resources including the Oregon Department of Fish and Wildlife (ODFW) (Harrington 2023), U.S. Fish and Wildlife Service (USFWS) (USFWS 2023, 2022), National Oceanic and Atmospheric Administration (NOAA) (Rumsey et al. 2022), national wildlife conservation organizations (National Audubon Society, National Wildlife Federation, Natural Resources Defense Council, American Bird Conservancy, Surf Rider Foundation, Center for Biological Diversity, and Sierra Club) as well as numerous local conservation organizations (Portland Audubon, Kalmiopsis Audubon Society, Cape Arago Audubon Society, Audubon Society of Lincoln City, Lane County Audubon Society, Umpqua Valley Audubon Society, Salem Audubon Society, Audubon Society of Corvallis, Rogue Valley Audubon Society, Klamath Basin Audubon Society, East Cascades Audubon Society, Redwood Region Audubon Society, Native Fish Society, Oregon Wild, Oregon Chapter of the American Cetacean Society, Coast Range Forest Watch, Friends of Haystack Rock, Rogue Climate, and Oregon Shores Conservation Coalition) (Steingard et al. 2024, Vileisis et al. 2023, Liebezeit et al. 2022, Weiler et al. 2022). To my knowledge, BOEM does not typically require wind developers to conduct any monitoring whatsoever—states must insist on these requirements.	Please see the general response to this comment above.

Name	Comments	DLCD Response
Michael Szumski	If the State of Oregon wishes to consider OSW along the Oregon Coast, I urge State regulators to take the following actions: 1. Conduct a second, independent analysis to identify potential WEA sites designed to minimize harmful effects of OSW to seabirds and other marine species. The analysis should be led by agencies, individuals, or firms having direct knowledge of Oregon seabirds, important seabird hotspots, currently available data, study design principles, marine processes, and statistical modeling of seabird populations. 2. Delineate a buffer around all IBAs such that impacts to birds reliant on these areas are minimized. 3. Establish long-term monitoring of seabird abundance and distribution on WEAs and surrounding areas before and during construction, and over the lifespan of the project. Such monitoring should be designed and conducted in a manner that will produce defensible results and will use appropriate survey methods and statistical techniques. 4. Conduct additional research on seabird species that are known or suspected to use or transit the WEAs, are vulnerable due to their conservation status, or who are at risk due to their flight characteristics or behaviors that might bring them in contact with the OSW facility. Research should also be conducted on the effects of OSW facilities on local upwelling. 5. Insist on full compensation/mitigation for injuries to seabirds (such as direct mortality, reduced survival, reproduction, and fitness, or displacement from foraging or nesting habitat) from the siting, construction and operation of OWS facilities. Such mitigation should use well established injury/restoration methods like Resource Equivalency Analysis (Zafonte and Hampton 2005). 6. Conduct an Environmental Assessment (EA) of potential WEAs that includes all phases of the project from site assessment through construction, operations and site decommissioning. This should be conducted well before any WEAs are finalized.	Please see the general response to this comment above.

Name	Comments	DLCD Response
Fertile Ground Conservancy	I write as Board President of Fertile Ground Conservancy. I am also the cofounder of Protect Thacker Pass, the coauthor (with Derrick Jensen and Lierre Keith) of Bright Green Lies: How the Environmental Movement Lost Its Way and What We Can Do About It, and the author of the public scoping comment of June 2024 to the Bureau of Ocean Energy Management and the Oregon Coastal Management Program that posed 120 specific questions about the proposed offshore wind energy projects on Oregon's coast — a comment whose substance was published in The Oregonian and the Curry Pilot. I refer to that scoping comment in Section 4 below; many of its questions remain unanswered by the Draft Roadmap, and they belong on the record of this proceeding as well.	See accompanying tab. Many of the questions were relevant to the 2024 BOEM leasing proposed action but are not applicable to the Roadmap planning process.
Fertile Ground Conservancy	On behalf of Fertile Ground Conservancy, I urge the Department of Land Conservation and Development, the Roadmap Roundtable, and ultimately the Oregon Legislature to adopt the No Offshore Wind Energy pathway as the state's strategic direction. The Draft Roadmap presents this option as merely a "status quo" alternative to be evaluated against three development pathways. It is not. It is the only pathway consistent with the precautionary principle, with the Roadmap's own admissions about the state of the science, with the explicit opposition of multiple federally recognized tribes whose ancestral waters are at stake, and with Oregon's actual energy planning as documented in the 2025 Oregon Energy Strategy.	Thank you for your comment. The Roadmap is not a vehicle by which the state will decide whether to pursue offshore wind energy or whether to approve or oppose any specific project. It is a planning and recommendation effort to identify standards, processes, or actions the state should apply to any future offshore wind energy decision-making effort. The reference to the No OSW pathway as a "status quo" alternative has been removed to make it clear that this pathway is to be considered equally with other pathways.
Fertile Ground Conservancy	What is being contemplated for Oregon's coastal waters is not a renewable energy project of familiar scale. It is the largest single proposed energy development in this state in generations: an industrial transformation of more than 1,800 square miles of the Pacific — an area roughly eight times the combined footprint of Portland, Gresham, Hillsboro, and Beaverton, and more than six times the area of Crater Lake National Park. The structures proposed are individually larger than the Empire State Building, each floating on a platform the size of a baseball stadium, each tethered by miles of steel chain with links as thick as a human body, sweeping across the seafloor in a maze that would have no analog anywhere in the world's oceans. To call this a "pilot," or to fold it into the bureaucratic vocabulary of "checkpoints," "alternative futures," and "considerations," is to	No change has been made to Roadmap. The "pilot project" pathway is described as encompassing a lower total capacity and ocean area compared to the full scale development pathways. The Roadmap does not specify the total maximum capacity of a pilot project, only describing it as being able to range from a single turbine to a small array; however, it provides an example of the Maine Offshore Wind Research Lease that was designed for a maximum of 12 turbines generating up to 144 MW. This represents an area of 12 square miles rather than 1,800. The Roadmap describes in Section 4.4.1.2 (Oregon Hosts an Offshore Wind Energy Industry With Major Port Development) estimates that a 1 GW offshore wind energy array would require approximately 8.2 square miles of ocean space. The concepts of checkpoints and alternative futures are intended to

Name	Comments	DLCD Response
	perform a category error. This is a question of whether Oregon will permit the industrialization of one of the most productive marine ecosystems on Earth on the basis of unknowns the Roadmap itself acknowledges and cannot resolve.	represent ways the state can maintain options for whether and to what extent it can proceed with offshore wind energy if it chooses.
Fertile Ground Conservancy	I will be direct: the Draft Roadmap, despite the genuine effort and good faith of its authors, is structurally tilted toward development. Its framework treats four pathways as comparably weighted alternatives when in fact the procedural design — "checkpoints" rather than the "exit ramps" originally proposed in 2023, leasing presumptively continuing in federal waters regardless of state preference, "insufficient information about cumulative effects" treated as a research agenda rather than a stop condition — biases every decision point toward proceeding. The comment that follows engages the Roadmap on its own terms and answers DLCD's six guiding questions, but it begins from a different premise: that the burden of proof belongs to those proposing irreversible industrial transformation of public marine commons, not to those defending an intact ocean.	In the description of checkpoints, the Roadmap states that the outcomes at a checkpoint include waiting until necessary information or assurances are in place (likened in Roadmap Roundtable meetings to "pulling over to a rest area"), or else switching to a different pathway (i.e., exiting that path). This expansion of the original concept of exit ramps, which emerged from the informal discussions that preceded the Roadmap process, was an outcome of discussions among the Roadmap advisory group over the course of multiple meetings. The shift acknowledges that the state has formal opportunities through its federal consistency authority to indefinitely "stay" review decisions if necessary data or information is not available. DLCD disagrees that the Roadmap is structurally tilted toward development. The original legislation in HB4080 that directed creation of the Roadmap states that it must "define standards to be considered in future offshore wind decisions and processes." The legislation does not explicitly envision a direction for the state - with or without turbines - only that any decisions be based on appropriate standards. The decision to include multiple alternative futures in the Roadmap was intended to be a visioning and planning tool, which would help process participants and readers better reflect on the conditions, standards, and actions that would be necessary for each path to be one of "no regrets". The Roadmap is not a vehicle by which the state will decide whether to pursue offshore wind energy or whether to approve or oppose any specific project. It is a planning and recommendation effort to identify standards, processes, or actions the state should apply to any future offshore wind energy decision-making effort. The reference to the No OSW pathway as a "status quo" alternative has been removed to make it clear that this pathway is to be considered equally with other pathways.

Name	Comments	DLCD Response
Fertile Ground Conservancy	1. The Scale and the Ecology Are Incompatible Section 1 of the Roadmap frames offshore wind as a potential contributor to Oregon's clean energy and climate goals "if it is realized responsibly and complements onshore renewable energy projects while protecting the coastal communities, cultures, economies, and natural environment." The conditional clause is doing enormous work in that sentence. The Draft does not, and cannot, demonstrate that the proposed development can satisfy any of those conditions, because the basic ecological questions remain unanswered. The Pacific coast off Oregon is sustained by a wind-driven upwelling system. North winds blowing parallel to the coast push surface water offshore through Ekman transport; cold, nutrient-rich water rises from below to replace it. That upwelled water fertilizes phytoplankton, which feed zooplankton, which feed forage fish, which sustain salmon, seabirds, marine mammals, and the entire California Current Large Marine Ecosystem. This is not abstract — it is the physical mechanism by which the Oregon coast is one of the most biologically productive marine systems on the planet, and it is the mechanism on which Fertile Ground Conservancy's downstream-watershed conservation work depends. Wind turbines extract energy from wind. They reduce wind speed downstream — that is what they are designed to do. A 2023 paper by Raghukumar et al. in Communications Earth & Environment, modeling a hypothetical buildout of 877 turbines off the West Coast, found that wind-stress reductions could shift the spatial structure of upwelling "outside the bounds of natural variability," and concluded plainly that "the consequences of these changes in physical upwelling structure on the ecosystem are currently unknown." That was a study of 10 MW, 128 m hub-height turbines. The turbines proposed for Oregon are substantially larger. The proposed Oregon arrays would extract far more wind energy from a far larger area, and we do not know what that does to the food web. We do not know what it does to salmon. We do not know what it does to whales. We do not know what it does to the seabird colonies along the south coast or to the offshore zooplankton communities that anchor everything above them. The Roadmap's own Enforceable Policy Assessment (Appendix A)	Thank you for your comment. The Roadmap acknowledges that uncertainty remains regarding potential effects from offshore wind energy development and recommends a comprehensive risk and uncertainty management strategy in Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk). This strategy includes requiring cumulative assessment prior to future leasing, creation of a state-specific offshore wind energy science collaborative, pursuit of an Oregon-specific research agenda, participation in regional science collaboration with neighboring states and Tribes, and establishment of adaptive management as an enforceable mechanism within a permit proposal for a project. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future.

Name	Comments	DLCD Response
	acknowledges "insufficient information about cumulative effects." Section 4 identifies the same gap repeatedly. This is the central ecological reality, and it points unambiguously toward the No Offshore Wind Energy pathway. A precautionary regulator does not industrialize an ecosystem whose foundational physics it does not understand and then promise to monitor what happens. That is the inverse of precaution.	
Fertile Ground Conservancy	2. Endangered Whales Are Already in the Proposed Lease Areas The Marine Mammal Institute at Oregon State University, surveying the planned offshore wind development zones off northern California and southern Oregon, has documented humpback whales, blue whales, and sei whales in significant numbers within the very areas under consideration for leasing. Blue whales and sei whales are federally listed as endangered. Several humpback subpopulations are also listed. Researchers have additionally documented threatened marbled murrelets, black-footed albatrosses, and Laysan albatrosses transiting these waters. These are not speculative concerns. These are confirmed observations of endangered species in the proposed industrial footprint, made before the seismic surveying, pile driving (or anchor installation, in the case of floating platforms), increased vessel traffic, electromagnetic-field disruption from subsea cabling, light pollution, chronic operational noise, and fixed entanglement hazards have begun. The Marine Mammal Protection Act and the Endangered Species Act apply here in their full statutory force, and the Roadmap should not be treated as a planning document that can route around their substance through procedural engagement. Section 6 of the Roadmap correctly notes that compliance with the MMPA, ESA, and Magnuson-Stevens Act is required at the federal level. It does not adequately convey that, for several of the species concerned, the appropriate state response to the documented presence of endangered cetaceans in proposed lease areas is to recommend against leasing — not to recommend better baseline studies. Fertile Ground Conservancy urges DLCD to add to the Roadmap a clear statement that the documented presence of endangered marine mammals in the BOEM Oregon call areas, combined with the	Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future. Additionally, the Roadmap recommends a state-led siting process that may address the interests reflected in your comment.

Name	Comments	DLCD Response
	unresolved questions about cumulative impacts of floating offshore wind on cetacean health, navigation, and prey distribution, is independently sufficient grounds for the State of Oregon to oppose leasing under federal consistency review.	
Fertile Ground Conservancy	3. The Affected Tribes Have Already Spoken The Roadmap's commitment to government-to-government consultation is welcome. But it should be more honest about what the consulted tribes have already said. The Yurok Tribe, the Bear River Band of the Rohnerville Rancheria, the Cher-Ae Heights Indian Community of the Trinidad Rancheria, the Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians, and the Tolowa Dee-ni' Nation have each passed formal resolutions opposing offshore wind energy development off the Oregon and Northern California coast. The National Congress of American Indians has called for a moratorium on West Coast offshore wind leasing. These are positions of record, taken through tribal sovereign processes, addressing the same waters the Roadmap is contemplating. Oregon's stated commitment to honor tribal sovereignty and to elevate tribal perspectives in marine planning cannot be reconciled with continued state advocacy for any development pathway. The Roadmap's "meaningful engagement" guiding principle is not satisfied by ongoing consultation toward a predetermined direction. It is satisfied by responding to what the affected tribal nations have already said. Adopting the No Offshore Wind Energy pathway is the response consistent with that principle.	Thank you for your comment. The Roadmap in Section 6.4 (Protect Tribal Cultural and Archaeological Resources, Culturally Significant Viewsheds, Subsistence Activities, and other Interests of Tribes) contains an extensive set of recommended actions and policies to support Tribal involvement in offshore wind energy decision-making, including the use of traditional knowledge, protection of data sovereignty, Tribal involvement in ground disturbing activities, Tribal policy coordination with similar state policies, and Tribal engagement with the state, federal agencies, and developers. The nine federally recognized Tribes in Oregon were invited to participate in the development of the Roadmap, and multiple Tribes participated in direct discussions with DLCD that led to the recommended strategies and actions throughout the Roadmap. The Roadmap also includes provided statements from Tribes in Appendix F.

Name	Comments	DLCD Response
Fertile Ground Conservancy	4. The Underlying Science Is Not Adequate to Justify Any Development Pathway In June 2024, in a public scoping comment to BOEM and the Oregon Coastal Management Program, I submitted 120 specific questions about the proposed offshore wind energy projects. The questions span agency conflict of interest, upwelling and ocean circulation, fish and oceanic life, anchoring and seafloor impacts, birds, cumulative effects in the context of the sixth mass extinction, the actual greenhouse gas accounting of the projects' full lifecycle, impacts to tribal cultural sites and resources, noise and light pollution, mining and extraction impacts globally, terrestrial port and transmission impacts, and decommissioning. I incorporate that scoping comment by reference and ask DLCD to do the same for the purpose of the Roadmap's cumulative-effects analysis. Among those 120 questions, several deserve particular attention from this Roadmap, because the Roadmap purports to define standards Oregon will use in federal consistency review and state permitting: • Every offshore wind array BOEM has previously permitted has resulted in a Finding of No Significant Impact, despite peer-reviewed literature concluding that offshore wind "may lead to significant environmental impacts." If BOEM's track record is to issue FONSI determinations as a matter of course, what concrete state-level mechanism does Oregon propose to use to compel a real Environmental Impact Statement for floating arrays at depths and scales that have never been built anywhere in the world? • Anchor chains for floating turbines drag across the seafloor as platforms move with wave and storm action. A typical commercial-scale array may include roughly 175 miles of chain and cable per project. What is the cumulative, project-buildout estimate for chain and cable lengths off Oregon, the volume of seafloor scour, the suspended sediment generated, and the impact on benthic communities including coldwater corals and the sediment-dwelling prey base for groundfish? The Roadmap does not provide these figures. • Substations leak sulfur hexafluoride (SF6), a greenhouse gas with	Thank you for your comment. The Roadmap acknowledges that uncertainty remains regarding potential effects from offshore wind energy development. Section 6.3 (Protect the Environment and Species (Marine, Terrestrial, Estuarine, Freshwater)) of the Roadmap presents a comprehensive uncertainty and risk management strategy that combines Oregon's precautionary stance toward offshore renewable energy development, the mitigation hierarchy established in ocean policy, a regional perspective on cumulative impact assessment, and mechanisms for ongoing adaptive management and monitoring with enforceable accountability measures. Together, DLCD believes the Roadmap achieves the intent of this comment.

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	23,500 times the warming potential of CO2 and an atmospheric lifetime of approximately 3,200 years. How many tons of SF6 are projected to be installed in associated substations, and what is the projected annual leak rate? Why is this not in the Roadmap's energy and climate accounting? • Wind turbine blades use balsa wood whose extraction has been documented driving deforestation in the Ecuadorian Amazon, with serious consequences for indigenous communities. Rare-earth processing for the permanent magnets used in offshore wind generators, according to Rees and Seibert (2022), already produces as much radioactive waste as the nuclear industry. What is Oregon's accounting of these supply-chain impacts in its consideration of whether offshore wind development off its coast is consistent with the state's stated values around environmental justice and indigenous rights? These are not gotcha questions. They are the basic substance of an honest cumulative-effects assessment, and the Roadmap should not finalize without engaging them.	
Fertile Ground Conservancy	5. Oregon's Own Energy Strategy Does Not Require Offshore Wind Section 4.2 of the Draft Roadmap candidly admits that the 2025 Oregon Energy Strategy "does not explicitly include offshore wind energy in its modeling." That admission deserves more emphasis than it receives in the document. It means the state's own integrated energy planning has concluded that Oregon can meet HB 2021's clean electricity mandates — 80 percent below baseline by 2030, 90 percent by 2035, 100 percent by 2040 — through a combination of expanded onshore renewables, transmission upgrades, energy efficiency, demand-side management, regional market participation, and other generation resources, without offshore wind. If Oregon's clean energy mandates can be met without offshore wind, then the framing of the No Offshore Wind Energy pathway as a sacrifice — as a pathway that requires "reliance on other emerging technologies" with the implication of incompleteness — is misleading. It is the pathway that aligns with the state's own modeled climate trajectory. The other three pathways are additions to that trajectory, and the question they pose is not "how do we meet our climate goals"	Thank you for your comment. It is true that the reference model used in the Oregon Energy Strategy did not assume the presence of offshore wind energy in order to meet climate and energy goals by 2050. However, as pointed out in Section 2.3.1 and Section 6.2.3 (Oregon Energy Strategy (2025) and Improve Understanding of Offshore Wind's Potential Benefits and Costs for Oregon to Clarify Investment Decisions strategy, respectively), the Energy Strategy model was coarse in nature and included a number of assumptions that may not prove accurate. For example, the model assumed that California built out the full 25 GW of offshore wind energy in the next 20 years established as a goal in that state. The Energy Strategy also assumes multiple gigawatts of new solar energy installed in the state, while the location of this development or where it would interconnect with the transmission grid is unspecified. The Energy Strategy model includes a remainder of unmet demand that it assumed would be fulfilled by "emerging technology", and the entirety of this remainder was assumed to be enhanced geothermal energy based on a slightly less expensive levelized cost of energy based on today's cost models.

Name	Comments	DLCD Response
	but "how much additional industrial development of the marine commons will Oregon authorize on top of meeting its climate goals." That question has a defensible answer of zero. The Roadmap's framing — implicitly that No OSW means Oregon "misses out" on something — also obscures that demand growth from data centers, AI infrastructure, and other industrial users is the principal driver projected for west-coast electricity demand increases. Oregonians are being asked to accept the industrialization of their coast in part to power data centers whose siting and demand the state has not meaningfully constrained. The cumulative-effects analysis the Roadmap calls for must include a candid accounting of who the additional electricity is actually for.	Finally, the Energy Strategy demand forecasts did not include the rapid increase of energy demand brought by datacenter growth in the state and region, which may substantially affect the conclusions that may be drawn regarding how much electricity generation the state will ultimately require to meet its energy and climate goals by 2050. The Energy Strategy does include offshore wind energy as an emerging technology to continue researching and exploring, to better understand how it might fit into Oregon's energy mix in the future. The Roadmap is a complementary effort to identify the standards, actions, and investments that would be required to achieve responsible offshore wind energy development if it occurs. The Roadmap recommends further refinement of the Oregon Energy Strategy to develop a coherent energy comparative analysis and strategy that considers multiple dimensions of cost and benefit associated with the state's future renewable energy options.
Fertile Ground Conservancy	6. The "Discrimination" Constraint Is Not a Reason to Be Permissive Table 4-2 of the Draft acknowledges the legal complication that Oregon cannot enact an enforceable policy explicitly prohibiting offshore wind energy in federal waters, citing NOAA's denial of Senate Bill 256 (2019)'s oil and gas drilling provisions as an enforceable CZMA policy. The implication seems to be that, because a categorical ban faces federal-consistency obstacles, the state should adopt the "managed development" framing of the four-pathway model. Fertile Ground Conservancy respectfully disagrees with that implication. The legal landscape constrains the form of state policy, not its substance. Oregon retains, under existing CZMA authority and under its own statutory and constitutional powers, the ability to: • Adopt enforceable policies that apply neutrally to any large-scale marine industrial development — including specific protections for upwelling zones, cetacean transit corridors, seabird foraging grounds, and tribal cultural seascapes — that, as a factual matter, would render the proposed offshore wind arrays incompatible with state policy. • Use the existing 2 percent and 1 percent area caps in Part Five of the Territorial Sea Plan as a model for federal-waters policy guidance, and seek federal acceptance of analogous caps under federal consistency review.	The description of Pathway 1 in Section 4.2.1 (A Pathway Focused on Existing Ocean Uses Without Offshore Wind Energy) has been revised to include the option for the state to decline to invest state funds toward the furtherance of offshore wind. DLCD agrees that while the state may not be able to draft policies directly restricting offshore wind energy projects, there may be other policies that could be neutrally applied to any large-scale marine industrial development that could potentially render offshore wind energy projects incompatible with state policy. As with any project, the outcome of a review would be based on its effects. This is essentially what already happens during federal consistency reviews. A primary purpose of the enforceable policy assessment in Appendix A is to identify whether there are any effects specific to offshore wind energy that warrant new or amended enforceable policies, so the effects of these projects may be fully captured in state federal consistency reviews. The examples of effects included in this comment are represented in Appendix A (Enforceable Policy Assessment).

Name	Comments	DLCD Response
	• Decline to invest state funds, modify state lands authorities, or enter into state agreements that facilitate transmission, port, or supply-chain infrastructure for offshore wind. • Object, through federal consistency review at the leasing stage and again at the permitting stage, on the substantive grounds that proposed projects are inconsistent with multiple state enforceable policies — including those identified for strengthening in Appendix A. • Pursue legislation that expressly directs the state's Federal Consistency posture to be one of objection where cumulative-effects information is insufficient, where endangered species are documented in proposed lease areas, or where affected tribes have formally opposed development. These are not categorical bans. They are substantive enforceable policies of the kind NOAA has approved in other contexts. The Roadmap should recommend their adoption as the operational mechanism of the No Offshore Wind Energy pathway, rather than treating active discouragement as a problem of legal infeasibility.	
Fertile Ground Conservancy	7. "Checkpoints" Are Not Exit Ramps Table 4-1 of the Draft, candidly, traces the linguistic shift from the 2023 Considerations document's "exit ramps" to the current document's "checkpoints." The shift is not neutral. An exit ramp implies a clear off-pathway action — a moment at which a project is stopped. A checkpoint, in the Roadmap's own definition, is a moment at which the state can "A) move forward, B) request more information or adjust plans, or C) not move forward." Two of those three options keep the project moving. The third — "not move forward" — is presented without any mechanism for what triggers it, what standard governs it, or what authority makes it stick against federal leasing momentum. If the Roadmap is to be credible as a tool for any pathway other than full-scale development, the checkpoint architecture needs explicit, science-based stop conditions. The No Offshore Wind Energy pathway provides this clarity at the front end and avoids the procedural drift that checkpoint regimes are known to produce in practice.	The decision to reframe the "exit ramp" concept from the informal group that preceded the Roadmap process into "checkpoints" came from discussions among the Roadmap Roundtable advisory group. This decision is discussed in Table 4-1 of the Roadmap. More information has been added into the callout box in Table 4-1, describing potential mechanisms for exits at different stages of an offshore wind energy development process.

Name	Comments	DLCD Response
Fertile Ground Conservancy	Direct Responses to DLCD's Six Guiding Questions 1. How well do the guiding principles in Section 3 reflect what should guide future actions? The four guiding principles — meaningful engagement, credible information, regional coordination, clear checkpoints — are reasonable in form and inadequate in operation. "Meaningful engagement" is undermined when the engagement does not change the strategic direction even after multiple sovereign tribal nations have formally opposed it. "Credible information" is undermined when the document acknowledges insufficient information on cumulative effects but does not adopt the precautionary inference that follows. Fertile Ground Conservancy recommends adding a fifth principle: precaution, defined as a presumption against marine industrial development where cumulative-effects science is insufficient and where affected tribal nations have formally objected.	As described in Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk), the precautionary principle is already enshrined in state policy. Under its federal consistency authority, the state may also require sufficient information to review effects against enforceable policies. However, mitigation and adaptive management are also established in state policies as acceptable methods to manage uncertainty and risk. A structural tension exists between precaution and adaptation. The discussion of the state's ability to require sufficient information, contained in full Enforceable Policy Assessment in Appendix A, has been referenced in Section 6.3.2.
Fertile Ground Conservancy	2. Are the descriptions of the alternative futures in Section 4 appropriate? The four pathways are described in a way that reads as even-handed but in practice frames No Offshore Wind Energy as a passive default rather than a deliberate strategic choice. We recommend revising Section 4.2 to (a) lead with the affirmative reasons for selecting No Offshore Wind Energy — alignment with the 2025 Oregon Energy Strategy, alignment with tribal sovereign positions, alignment with the precautionary principle in the face of unresolved upwelling and endangered species questions, and protection of coastal commercial fishing, recreation, viewshed, and tourism economies — and (b) treat the pilot and full-scale pathways as proposals that must affirmatively overcome those reasons before being adopted.	The description of the No OSW pathway has been revised based on this and other comments. Among the changes is the removal of the "status quo" reference in the description of the pathway and clearer indications that this is a path the state may independently choose - albeit not without the risk that future federal administrations or developers might still express interest and propose projects in federal waters.

Name	Comments	DLCD Response
Fertile Ground Conservancy	3. Are there additional important steps along the pathways not reflected? Yes. The Roadmap should add: (a) a formal step at which Oregon assesses tribal sovereign positions and treats sustained tribal opposition as a substantive ground for state objection; (b) a formal step at which the state validates the 2025 Oregon Energy Strategy's modeling — that offshore wind is not required to meet HB 2021 — before any development-pathway action is taken; (c) a formal step at which a Programmatic Environmental Impact Statement for the full west-coast offshore wind buildout, including ports, transmission, and supply chain, is required as a precondition to any individual project advancing through state federal-consistency review.	Thank you for these specific suggestions. DLCD believes they have been incorporated into the Roadmap in the following ways: A) Section 6.4.8.1 (Action: Consider Tribal government policies during state Federal Consistency reviews) recommends a new mode of engagement between Tribes and the state during federal consistency review of offshore wind energy projects. Under this recommendation, the state would seek Tribal interpretation of how the proposed project is or is not consistent with their sovereign government policies, and the state would consider these interpretations as guidance for implementing its own policies that cover similar interests (e.g., ecological protection policies). b) Section 6.2.3.1 (Action: Continue to refine the <i>Oregon Energy Strategy</i> to reflect changing conditions in offshore wind energy technology and the regional energy market) recommends additional refinements to the Oregon Energy Strategy modeling and a comparative cost-benefit analysis of offshore wind energy relative to other potential generation sources. c) Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) includes a recommendation for the state to require a cumulative impact assessment prior to any future leasing, via amendment to the Territorial Sea Plan Part Two.
Fertile Ground Conservancy	4. Are there additional policy gaps or recommendations not considered? Yes. The Enforceable Policy Assessment in Appendix A should add: (a) explicit cumulative-effects standards for marine industrial development, applying neutrally to any large-scale energy or extraction proposal; (b) protections for documented marine mammal transit corridors and endangered cetacean habitat that meet the substantive requirements of the MMPA and ESA at the state federal-consistency level; (c) explicit protection of upwelling zones and the California Current Large Marine Ecosystem from large-scale wind energy extraction; (d) supply-chain and lifecycle accountability standards covering the rare-earth, balsa wood, and steel supply chains; (e) an SF6 inventory and leak-accounting requirement for any associated substation infrastructure.	Thank you for these specific suggestions. The recommended additions have been included in the full Enforceable Policy Assessment found in Appendix A.

Name	Comments	DLCD Response
Fertile Ground Conservancy	5. Information or preferences affecting Section 6.8 prioritization? Recommended actions specific to the No Offshore Wind Energy pathway should be elevated to the highest priority tier: enforceable policy strengthening, tribal consultation honoring sovereign positions of opposition, and federal consistency posture clarification. Actions that build supply chain, port infrastructure, or workforce development for offshore wind should be deprioritized or removed; under No OSW, organic, market-driven supply-chain participation as a service to other states' projects (the Roadmap's own framing) does not require state policy or investment action.	Thank you for your suggestions. The description of Pathway 1 (Section 4.2, No Offshore Wind Energy) has been revised consistent with this and other comments. The pathway description already describes how port development or workforce development are not included in the pathway and would emerge organically. Additionally, actions such as enforceable policy updates and strengthening Tribal engagement have been included in the Summary for Policymakers as priorities under all pathways.
Fertile Ground Conservancy	6. Other general thoughts? The most important general thought is this: the Pacific Ocean off Oregon's coast is not infrastructure. It is one of the most biologically rich marine ecosystems remaining on Earth, its productivity built over geologic time on a wind-and-current pattern that humans did not design and do not understand. The proposed industrial buildout is not a low-stakes experiment we can reverse if it goes wrong; floating turbine arrays cannot be undone, and ecosystems do not heal on the timescale of policy adjustment. A state that has fought hard to halt fossil-fuel infrastructure — Jordan Cove, the GTN XPress expansion, the long history of salmon-killing dams on the Columbia and Willamette — should not now permit a development of comparable scale and comparable irreversibility on the basis that the technology has "green" branding. One harm does not justify another.	Thank you for your comment.
Fertile Ground Conservancy	Fertile Ground Conservancy urges DLCD to revise the Public Review Draft and to recommend to the Legislature that Oregon adopt the No Offshore Wind Energy pathway as its strategic direction, supported by: • Strengthened enforceable policies to underwrite substantive state objections in federal consistency review, including cumulative-effects standards, upwelling-zone protections, and endangered-species protections that operate neutrally across marine industrial development types. • Formal recognition of and response to the sovereign opposition of the Yurok, Bear River, Cher-Ae Heights, CTCLUSI, and Tolowa Dee-ni' nations, and to the National Congress of American Indians' moratorium call.	Thank you for your comment. Please see the responses to the specific comments above associated with the items in this summary.

Name	Comments	DLCD Response
	• A clear public statement that Oregon's clean-energy mandates under HB 2021 are achievable without offshore wind, consistent with the 2025 Oregon Energy Strategy. • A declined posture toward state investment in port, transmission, or supply-chain infrastructure specifically intended to serve offshore wind development. • A continued commitment to ambitious decarbonization through onshore renewables, efficiency, transmission, and regional grid coordination — the work the state is in fact already doing. The Roadmap is being prepared at a moment of rapidly shifting federal policy and industry viability for floating offshore wind. The Draft itself acknowledges this uncertainty as a reason for adaptive flexibility. The most adaptive, most precautionary, and most honest position Oregon can take in this moment is to decline. The ocean off our coast is not a resource awaiting extraction. It is a place — alive, productive, irreplaceable — and it is held in trust for purposes far older and more durable than any thirty-year energy lease.	
Oceantic Network	Oceantic appreciates the opportunity to comment on Oregon's Draft Offshore Wind Roadmap. We commend the State's development of a framework to evaluate potential offshore wind pathways. From a supply chain perspective, the roadmap would benefit from additional clarity and emphasis on the role of early, strategic state investment in enabling meaningful economic participation under future scenarios. Oceantic Network believes it is important to highlight that a pathway in which little to no early or strategic investments in offshore wind supply chain readiness significantly limit a state's ability to participate economically under any future scenario, including those where offshore wind development occurs elsewhere on the West Coast. We have seen this play out on the East Coast with neighboring states whose investments aren't complementary or additive. Long-term market visibility is especially important in floating offshore wind and West Coast markets, both of which are nascent and require the development of new supply chains to advance at scale. The global floating industry is transitioning from pilot-scale to early commercial deployment. However, the unique infrastructure and integration requirements for floating technologies will necessitate	Thank you for your comment. The description of Pathway 2 in Section 4 (Section 4.3, Economic Participation Only) has been revised to emphasize the need for state investment in supply chain readiness, and the discussion in Section 6.6.1 (Strategy: Establish Market Demand to Stimulate Port and Supply Chain Investment) has also been expanded to discuss how the industry and the state need to work together to establish a supply chain demand and fulfillment capabilities.

Name	Comments	DLCD Response
	substantial investment in local staging, assembly, and port infrastructure. Oceantic Network’s prior work, including the Suppliers’ Guide to Success: Smart Scaling for the U.S. West Coast Floating Wind Market and comments filed before the California Public Utility Commission, has consistently emphasized the value of long-term market visibility in enabling private sector investment and supply chain manufacturing infrastructure development.	
Oceantic Network	I. Offshore Wind Supply Chains Do Not Materialize Without State Commitment While the Roadmap includes a “no investment” or “observe only” pathway for consideration, it is important to clarify the implications of this approach for economic participation. In practice, absent early and strategic public investment, Oregon’s ability to attract or anchor offshore wind supply chain activity would likely be limited, even if development occurs elsewhere on the West Coast. As a result, this pathway may constrain Oregon’s ability to achieve one of the Roadmap’s core objectives: creating meaningful economic opportunity and sustaining local and regional economies. Offshore wind supply chains—particularly for floating technologies—do not emerge organically in response to private interest alone. Across the U.S. and international markets, meaningful supply chain participation has occurred most often where governments: • Made early, visible capital commitments; • Invested ahead of final project approvals; • Accepted shared risk to reduce first-mover uncertainty. Within the Roadmap’s “Economic Participation Only” and offshore wind development pathways, these conditions are not simply supportive; they determine whether a state can capture sustained commercial work. Without early and strategic public investment, private suppliers cannot justify investments in: • Port retrofits and site preparation; • Equipment procurement; • Workforce training pipelines; and • Facility permitting and design work.	Section 6.6.1 (Strategy: Establish Market Demand to Stimulate Port and Supply Chain Investment) has been substantially revised to include points made in this comment as well as feedback from Business Oregon regarding state needs to support strategic investment decisions.

Name	Comments	DLCD Response
	These are capital-intensive, long-lead investments that typically require a seven to ten-year pipeline of demand to support a viable business case.	
Oceantic Network	II. Oceantic Network’s West Coast Supplier Council Oceantic convened a West Coast Supplier Council (WCSC) in 2024, composed of Original Equipment Manufacturers (OEMs) and Tier 1/Tier 2 industry leaders with both international and domestic experience. Recognizing the unique infrastructure, procurement, and manufacturing challenges associated with floating offshore wind, the WCSC provides direct industry insight into what is required to build a viable and sustainable floating offshore wind supply chain across the region. Through the WCSC and the Oceantic Network’s broader supply chain programming, Oceantic can support Oregon interest parties in identifying practical solutions, highlighting gaps and opportunities, and fostering collaboration between public entities and private suppliers. Oceantic Network stands ready to support the implementation of Roadmap-recommended actions, including supplier mapping, market assessments, and identification of supply chain gaps. As part of this industry engagement, Oceantic Network emphasizes three foundational conditions for supply chain success: Port development is essential. No offshore wind supply chain can exist without the port infrastructure capable of supporting staging, integration, and manufacturing activities. In order for Oregon to gain supply chain opportunities from California’s floating wind projects, purpose-built marshaling and manufacturing space with sufficient upland acreage, draft depth, quayside length, and intermodal connectivity are required. A predictable project pipeline and clear state commitment are critical signals. Developers and manufacturers cannot invest in long-lead infrastructure or facilities without confidence that projects will be approved, constructed, and interconnected on a defined schedule. Visible state leadership and a long-term, binding procurement roadmap are important signals. Realistic, phased conditions for supply chain development are	The provided foundational conditions have been added to the introduction of Section 6.6 (Create Economic Opportunities and Sustain Local and Regional Economies)

Name	Comments	DLCD Response
	necessary. Siting availability, predictable permitting processes, and timely delivery of public infrastructure are essential to keep commercial scale timelines on track. Such predictability is essential for the supply chain to invest in new facilities, where seven-to-ten years of orders are needed to justify a business case.	
Oceantic Network	III. Ongoing Regional engagement is Critical. The roadmap appropriately identifies regional coordination as a key principle. However, regional supply chains do not develop passively; they form jurisdictions that demonstrate readiness and commitment. Our experience from other regions underscores that offshore wind supply chain participation is driven by early signs of commitment and coordinated investment. States and regions that have successfully attracted supply chain activity have paired long-term market visibility with strategic public investment, particularly port infrastructure, transmission planning, and workforce development. For example, early investments in port upgrades and pre-development activities in states such as Massachusetts and New York, as well as coordinated infrastructure planning efforts in California, have helped position these regions as focal points for regional supply chain activity. In these markets, public investment reduced risk for private suppliers and enabled earlier entry into the market. For Oregon, this reinforces that a passive or “observe only” approach is unlikely to result in meaningful participation without early investment. If Oregon delays early-stage investment pending greater certainty around offshore wind deployment, it increases the risk that: • Ports in other states are upgraded first; • Workforce programs and training pipelines are established elsewhere; • Suppliers will prioritize jurisdictions where infrastructure risk has already been reduced. By the time project certainty arrives, supply chain pathways may already be established, limiting Oregon’s ability to capture economic benefits.	Thank you for your comment. Section 6.6 (Create Economic Opportunities and Sustain Local and Regional Economies) has been revised to reflect points made in the comment and emphasize the need for regional coordination and state investment in infrastructure in order to capitalize on potential economic opportunities associated with offshore wind energy development in the region.

Name	Comments	DLCD Response
Oceantic Network	IV. Strategic Investment Does Not Mean Committing to Turbines Importantly, early or “option-creating” investment does not require Oregon to commit to offshore wind deployment off its coast. Rather, it means Oregon should: • Invest in infrastructure and capabilities that maintain optionality; • Prepare for future decision points identified in the Roadmap; • Avoid a binary choice between full deployment and no participation. Examples of appropriate, conditional investments include: • Port feasibility, engineering, and pre-permitting; • Workforce development aligned with maritime, construction, and electrical trades; • Industrial site readiness for secondary manufacturing; • Data driven mapping of in-state supplier capabilities and gaps. These investments provide value even if offshore wind development does not proceed at scale in Oregon, as they strengthen broader maritime, energy, and industrial capacity. Oregon’s Roadmap creates a strong framework to avoid these mistakes, but only if the state is willing to pair standards and pathways with real financial and institutional commitment.	Thank you for your comment. Aspects of this comment were added to the discussion in Section 6.6.2.2 (Action: Plan for future port development needs to support offshore wind energy).
Oceantic Network	VI. Recommendations: Strengthening Investment Alignment in Roadmap Implementation Oceantic Network respectfully recommends that Oregon consider the following enhancements to the Roadmap: • Elevate early, strategic public investment as a prerequisite for any economic participation pathway. • Align Roadmap checkpoints not only with environmental and community safeguards, but also with investment readiness and supply chain development milestones. • Identify priority areas for potential state investment, including: - o Port and industrial site preparation; - o Workforce development; - o Coordinated, regional supply chain planning. • Ensure investments are scalable and conditional, allowing Oregon to adjust or redirect based on future checkpoints without forfeiting early positioning.	Thank you for your comments. As described above, Section 6.6 (Create Economic Opportunities and Sustain Local and Regional Economies) of the Roadmap has been revised to include many of the points made in these comments, such as: strategic public investment to secure economic participation opportunities; coordination and investment in workforce development, port investment needs, and regional supply chain planning; and emphasizing that investments allow adjustment or redirection based on future checkpoints. The pathway diagrams in Section 4 (Alternative Futures for Offshore Wind Energy in Oregon) of the Roadmap already include port and supply chain considerations as part of each phase, to be considered at the checkpoint for that phase before continuing down the path.

Name	Comments	DLCD Response
American Society of Landscape Architects, Oregon Chapter	Our Recommendations ASLA Oregon supports the Roadmap’s recommendation to update Oregon’s visual resource inventory and further study community and tribal values surrounding visual resource effects. To accomplish this, ASLA Oregon urges that DLCD add visual resources to the research agenda and insist upon a strong and technically sound visual resource analysis process that will be used alongside, and with equal standing to, other resource assessments including fisheries, cultural resources, economics, and habitat. The resulting technically rigorous process can identify preferred lease areas and can be used as a basis for directing the extent and placement of BOEM leases, as opposed to accepting what they propose. We further recommend that Oregon’s visual resource process for offshore wind achieve the following outcomes: • Incorporate best professional practices and recent research. • Recognize and respect all potential viewers and near shore viewpoints. • Incorporate a robust understanding of how and why different people value certain locations, viewpoints and associated seascapes. • Recognize the importance of scenic quality in contributing to experiences of observers and from important viewpoints or corridors. • Consider impacts to recreationists who will encounter turbines from offshore (e.g., whale watching, recreational fishing, kayaking, surfing). • Consider impacts on coastal visitation, property values, and the tourism economy related to ocean scenery. • Facilitate cross-resource integration with other topics’ planning information and tradeoff assessments, particularly cultural and recreational resources. • Be easily understood and trusted by the public. • Produces maps and identifies opportunities that meaningfully inform project locations, leasing and permitting decisions, well before the COP process that occurs after leasing. • Can be used to design meaningful avoidance, impact reduction, and mitigation options.	Thank you for your comment. The provided visual resources research recommendations have been added to the research agenda discussion in Appendix C (Research Framework).

Name	Comments	DLCD Response
American Society of Landscape Architects, Oregon Chapter	To provide further technical guidance, the Offshore Wind Committee has developed a recommended Research Agenda for DLCD’s consideration. It is attached to this letter. ASLA Oregon requests that DLCD incorporate this research agenda into the Roadmap Guidance document. ... <i>For inclusion in Appendix C</i>	Thank you for your comment. The provided visual resources research recommendations have been added to the research agenda discussion in Appendix C (Research Framework).
Offshore Renewable Energy International LLC	Framing and Overall Position of the Document The document prepared by DLCD serves an important role in organizing information and identifying key issues related to offshore wind development in Oregon. It provides a valuable foundation for future discussions and decision-making. At the same time, it may be helpful to more clearly position the document in terms of its purpose. As currently structured, it reads less as a “roadmap” in the traditional sense and more as an early-stage, pre-decisional framework or an offshore wind readiness assessment. It effectively identifies challenges, uncertainties, and considerations, but it does not define a specific destination or articulate a clear pathway to achieve one. This distinction primarily affects expectations. Many stakeholders may have anticipated—or at least hoped—that the process would result in a more directional outcome, including a clearer understanding of whether, how, and at what scale offshore wind might contribute to Oregon’s energy future. Instead, the document focuses on building the foundation for those future decisions. Framing the document explicitly as an Offshore Wind Readiness and Planning Framework could help align expectations with its intent while preserving the value of the work completed.	Thank you for your comments and observations. The Roadmap purpose already positions itself as a pre-decisional framework given the uncertain future regarding OSW Energy, and DLCD believes the Roadmap is consistent with the directive of HB 4080 to define standards to be considered in future offshore wind energy decision-making, rather than a vehicle to realize the potential of offshore wind energy development in Oregon.
Offshore Renewable Energy International LLC	Strengths of the Roadmap Recognition of complexity: The authors undertook a difficult task navigating diverse stakeholder perspectives, scientific uncertainties, and evolving federal and state policy contexts. Clarity and readability: The document presents information clearly, follows a logical structure, and remains accessible to a broad audience—an important	Thank you for your comment.

Name	Comments	DLCD Response
	achievement given the complexity of the topic. Inclusive process: The Roadmap demonstrates meaningful engagement with a wide range of stakeholders, including coastal communities, tribes, industry, and environmental interests. Disappointingly, it seems there were more advisory committee members against offshore wind than in support. To include the developers with more regularity would have been an improvement in the process to help counter the biases and preferences within the committee makeup. Comprehensive issue identification: The report effectively catalogs key environmental, social, economic, and regulatory considerations. Foundation for future work: The process generated a valuable body of knowledge that can inform future policymaking and planning efforts.	
Offshore Renewable Energy International LLC	Key Considerations Despite these strengths, the document may not fully meet the expectations of stakeholders who anticipated a more directional outcome. The report compiles a broad range of proposals and perspectives, reflecting an effort to acknowledge and incorporate diverse viewpoints. This approach has value, though it also makes it challenging to identify a clear path forward. The offshore wind industry’s reduced engagement with Oregon prior to the 2024 federal lease auction reflected a combination of broader market conditions—such as inflation, interest rates, and supply chain constraints—as well as state-specific factors. These included uncertainty around market structure, the absence of defined deployment targets, transmission limitations, and unresolved stakeholder concerns. Observers described the cancellation of the 2024 federal lease auction as “Oregon’s failed market,” although today, with the national pause on all new offshore wind developments it may be more constructive to view it as a “missed opportunity.” In that context, the expectation emerged that this Roadmap would help position Oregon more effectively for future opportunities. The current document	Thank you for this information. Section 3.3 (Industry Insights: Precursors to Successful Offshore Wind Energy Development in Oregon) was expanded to include insights regarding the decision by the offshore wind industry’s reduced engagement prior to the 2024 lease auction.

Name	Comments	DLCD Response
	provides a strong analytical foundation, though it lacks a clear future direction.	
Offshore Renewable Energy International LLC	Comparison to Other State Approaches Oregon’s early review of other state roadmaps—particularly Maine’s—represented a thoughtful starting point. Maine structured its roadmap around five core objectives, using them to guide a cohesive strategy aligned with a defined statutory goal (3,000 MW by 2040). Oregon has taken a different approach. The current document does not define a specific offshore wind target, and ODOE has deferred consideration of offshore wind within its broader strategic planning. This approach reflects caution and the need to address uncertainties, though it also results in less clarity regarding long-term direction.	Thank you for your comment. The Oregon Offshore Wind Energy Roadmap is distinguished from other state roadmaps because its originating purpose and focus from HB 4080 was on defining standards to be considered in future decision-making processes, rather than representing a direct path to realize offshore wind energy development in Oregon. Other Roadmaps were also developed during a time of relatively higher certainty regarding federal direction and priorities regarding offshore wind development. Consequently, the Oregon Roadmap is structured to reflect its originating objectives and the current uncertainties inherent in the industry at this time.
Offshore Renewable Energy International LLC	Pathways and Direction The four “pathways” presented in the document offer a range of possible futures. This approach helps illustrate tradeoffs and uncertainties, but it may also diffuse clarity regarding state intent. Some elements of the pathways could benefit from further differentiation: • Decisions regarding whether offshore wind will play a role in Oregon’s energy mix ultimately fall within state policy and planning processes. • Economic development considerations related to supply chains may follow a separate, though related, track. • The pathways do not yet describe how the state might progress from its current position toward a defined level of deployment, should that become a policy objective. Clarifying how these pathways relate to future decision points could strengthen their usefulness.	Thank you for your comment. Specific recommended actions in Section 6.2 and Section 6.6 (Achieve State Energy and Climate Policy Objectives and Create Economic Opportunities and Sustain Local and Regional Economies, respectively) describe steps the state can take to refine the analyses that inform future decisions on offshore wind energy development, policy amendments that may address the relatively higher risk and longer lead-times of offshore wind development through procurement policies and transmission planning/investment, and economic development considerations related to regional supply chain planning and development. Rather than describe a single decision-point where the state decides to pursue offshore wind energy development, the Roadmap describes a set of conditions under which offshore wind development might occur in Oregon if they are implemented.
Offshore Renewable Energy International LLC	Role of a Pilot as a Constructive First Step Importantly, the absence of a defined end-state does not completely diminish the value of the work completed. The document captures substantial information that can support next steps. In this context, the inclusion of a pilot concept stands out as a particularly constructive element. Establishing a pilot project as an initial destination has strong merit. A well-designed pilot can:	Thank you for your comment.

Name	Comments	DLCD Response
	• Generate real-world, location-specific data • Help address environmental and community considerations • Build institutional knowledge and technical capacity • Provide a practical bridge between early-stage analysis and future decisions Given the number of identified information gaps, a pilot offers a pragmatic and incremental way to move forward while reducing uncertainty. Clarifying the pilot’s role as a foundational step toward future decisions, rather than as an alternative pathway, would further strengthen the framework.	
Offshore Renewable Energy International LLC	Suggested Improvements The Executive Summary could focus more tightly on actions that move the state forward and support decision-making. Presenting key priorities in a more streamlined manner may help policymakers engage more effectively with the material. It may also be helpful to: • Clarify how and when key policy decisions—such as the role of offshore wind in the state’s energy mix—will be addressed • Define how the current framework transitions into a more directional strategy over an outlined period of time • Illustrate a potential progression from the current stage to a future predeployment position (e.g., through a timeline or Gantt-style framework) • Position the pilot project as an early, actionable step within that progression These adjustments would build on the existing work and provide greater continuity between analysis and future action.	Thank you for your comment. DLCD has revised the Summary for Policymakers in an attempt to offer a more focused set of priority recommendations for each pathway (or actions that apply to all pathways). The action summary table in Section 6.8 (Assessment of Recommended Roadmap Actions) provides a general estimate of the timeline for actions and policy amendments necessary at each phase of development pathways. DLCD believes that elevating the pilot project pathway above the others is not currently defensible; however, the Roadmap attempts to describe the potential benefits and considerations of such a phased approach.
Offshore Renewable Energy International LLC	Final Thoughts The Roadmap represents an important—though previously missing—step in Oregon’s consideration of offshore wind. It establishes a strong analytical and participatory foundation. At the same time, the document does not yet function as a traditional roadmap with a defined destination. Framing it as a readiness and planning framework may better reflect its current role. With continued refinement—particularly through clearer articulation	Thank you for your comment.

Name	Comments	DLCD Response
	of next steps and elevation of the pilot concept as an initial milestone—Oregon can build on this work in a pragmatic and forward-looking way. By continuing to move toward informed, evidence-based decision-making, the state can position itself to respond effectively to future opportunities in offshore wind development.	
BlueGreen Alliance	At the time of this writing, the National Oceanic and Atmospheric Administration has issued a snow cap drought in the Northwest¹, potentially leading to a decrease on available hydro energy resource further compounding the energy reliability concerns the Pacific Northwest Utility Coordinating Committee (PNUCC) issued last year of an increased risk for blackouts and brownouts this summer and projected 30% energy demand growth leading to supply shortages to during peak summer or winter demand². Holistically, we believe that the state and region need to explore multiple energy and transmission-related solutions to avert the worst possible impacts of climate change and energy supply shortages for Oregonians. As we note with figures below in the addendum section, 3.5 GW Floating offshore wind has the potential to power thousands of homes, spur economic growth, create living wage union jobs in construction, operation and maintenance, as well the overall supply-chain (manufacturing, transportation, shipbuilding).	Reference to water availability effects on hydroelectric supply has been added to Section 2.3.3 (Electrical Grid Implications for Oregon and the Region) of the Roadmap in the context of future energy supply constraints and risks.
BlueGreen Alliance	First and foremost, our top-line recommendation is DLCD successfully adopt and implement HB 4080 responsible-labor-contractor “Covered Project” standards on all future offshore wind and related infrastructure to ensure <u>Oregon workers are afforded the full benefits and protections</u> of the established law. DLCD could utilize all its levers and tools in its charge to implement HB 4080 standards such as: • a minimum wage standard (i.e- living wage, prevailing wages, Service Contract Act, Collective bargaining agreements) • apprenticeship standards, • hiring and recruitment of women and BIPOC communities, • history compliance of state and federal laws, • Buy America • And/or the utilization of a Workforce Development Agreements	Section 6.7.1.1 (Action: Implement HB 4080 Labor standards and promote local family wage jobs with protections) has been substantially expanded and revised to emphasize the labor standards established in HB 4080.

Name	Comments	DLCD Response
BlueGreen Alliance	that includes a Project Labor agreement, Labor peace agreement, and a local-supply chain agreement. Th Top-level key recommendations to strengthen Offshore wind Roadmap: • Simplify Scenarios from Four to Three (remove economic-only scenario; should be a universal) • Support Funding Cities, Counties, and Tribal governments to better engage on all clean energy and transmission issues • Strengthen resources, hire staff to better support stakeholders to develop and implement legally enforceable agreements. • Strengthen policy Recommendations: - o Western regional collaboration on Science, Port, and Supply-chain development ▪ Collaborate with the California Ocean Protection Council (OPC) on the West Coast Science Collaborative for Offshore Wind. Recommend the state of Oregon to provide funding for this effort to expand the funding for research efforts on Oregon’s coast. - o Clean energy procurement that centers community and clean energy goals o Centralized Transmission policy that centers community and tribes o Multi-agency coordination to promote High Road Workforce Training, Standards, Compliance, and Implementation • See Addenda for additional information to share in the Oregon Offshore wind roadmap: - o Oregon’s Energy Mix - o Energy resource comparative - o Energy resource job creation metrics - o Job Quality Comparisons by sector	Thank you for these suggestions. - Economic only scenario will be retained after further discussion with the OSW Roundtable in reference to this comment. - The Roadmap will strengthen and clarify the recommendation to provide capacity support to cities, counties, and Tribal governments to engage on all clean energy and transmission issues. - The Roadmap includes a recommendation to provide capacity support to local communities to facilitate Community Agreement negotiations related to offshore wind energy projects. As described in the Roadmap, because the state may be an implementer of a policy related to community agreements, it was deemed inappropriate for the state to also facilitate the discussions; however, the state may provide technical or other expertise support for a process. - TO DISCUSS Recommendation around funding the WCSC. - Regarding the transmission centralized policy - refer to NY example as a way that transmission planning could follow the recommendations of the Roadmap through community benefit and early engagement of communities and Tribes. - A new action has been added to Section 6.7.1.3 (Action: Establish an Interagency Workforce Hub coordination group to promote consistent implementation across state agencies) related to establishing an interagency workforce hub to coordinate on how the state can consistently and effectively implement workforce policies and development across multiple agencies with different connections to workforce dimensions of their work. - Coordination on workforce training, standards, etc. - different agencies have different connections to workforce implementation (e.g., ODOT, Education, etc.) and dealing with prevailing wage and apprenticeship separately. Labor core team? Interagency workforce hub directed by GO (prosperity council?) or through legislative action? Look at high road partnership model in CA. - add contextual information to introduction of workforce section in Section 6 and the economic opportunity portion of Section 2.

Name	Comments	DLCD Response
BlueGreen Alliance	Model policies to consider: Protecting Oregonians and advancing clean energy solutions: California’s Clean Energy Procurement: California's central procurement legislation, primarily Assembly Bill 1373 (AB 1373) enacted in 2023, authorizes the California Public Utilities Commission (CPUC) and the Department of Water Resources (DWR) to centrally procure large-scale, long lead-time clean energy resources—such as 7.6 GW of offshore wind and 3 GW of storage/geothermal. This framework allows DWR to be the “central buyer” while enabling California PUC to evaluate the bids for quality, costs, and risks before final approval. AB1373 set criteria the commission needs to consider when evaluating bidders. These criteria included considering the bidder’s economic and local community impact, workforce development needs and opportunities, and environmental impact mitigation plans³. DWR is required to organize an advisory Procurement Review Group (PRG) made up of non-market participants, which could include Tribal Nations, community groups, other state agencies, as well as utilities and CCAs. DWR will issue solicitations for electricity and then power generators will respond with bids. The PRG will review those bids and advise DWR on whether to purchase the electricity⁴.	This model policy has been added as a call-out box, Table 6-1, in the Roadmap, Section 6.2.2.1 (Action: Explore potential economic incentives, energy planning policies, procurement frameworks and authorities, or other amendments to Oregon energy policy that might attract and facilitate long lead-time resources, such as offshore wind energy).
BlueGreen Alliance	NY Transmission legislation: The Accelerated Renewable Energy Growth and Community Benefit Act (AREGCBA) Passed in 2020, the act streamlines siting for major NY transmission and renewable projects while requiring developers to provide local benefits. It established a Host Community Benefit Program for projects over 25 MW, featuring payments (\$500/MW solar, \$1,000/MW wind annually) that reduce utility bills for residents. The Office of Renewable Energy Siting establishes regulations and uniform standards that encompass environmental impacts, identify mitigation measures to address those impacts, and develops draft permits for public comment and local community input. This program provides a centralized approach to 1) Engage local and tribal governments, 2) protect ratepayers in frontline communities, 3) Develop a framework for community benefit agreements⁵.	This model policy has been added as a call-out box, Table 6-1, in the Roadmap, Section 6.2.2.1 (Action: Explore potential economic incentives, energy planning policies, procurement frameworks and authorities, or other amendments to Oregon energy policy that might attract and facilitate long lead-time resources, such as offshore wind energy).

Name	Comments	DLCD Response
BlueGreen Alliance	Additional Background Information: Addenda A: Oregon's Energy Mix and Potential Offshore Wind Resource For much of the Pacific Northwest's recent history, the economic backbone for growth and development has come from cheap abundant hydroelectric resource from our dam infrastructure and the transmission system transmitting generation to industrial and residential users under the Bonneville Power Administration. Hydro makes up 33.7% of Oregon's Energy mix, with Natural gas (20.24%) and coal (11.26%) serving as important pillars for Oregon's overall energy mix⁶. Floating offshore wind offers unique attributes that could make it a useful resource as part of Oregon's energy mix, particularly its high capacity factor—its ability to generate energy continuously—due to constant wind resource on the coast, and having a relatively high energy return on investment depending on the size of the turbine and quality of wind resource. See below for definitions and comparisons between various energy resources to offshore wind. Energy Return on Energy Invested (EROI)- a crucial metric that measures the ratio of energy delivered by a process to the energy used directly and indirectly to acquire that energy. A higher EROI value means a more energy-efficient and profitable method. Formula: $EROI = \frac{\text{Energy Output}}{\text{Energy Input}}$ Key Factors Influencing EROI for Offshore wind: • High Material Intensity: Floating foundations require substantial amounts of steel or concrete, impacting the initial energy investment. • Improved Wind Resources: Deep-water locations offer stronger, more consistent winds, which increases the lifetime energy output, thus improving EROI. • Logistics & Maintenance: The ability to tow turbines back to shore for repairs could potentially enhance the lifetime energy return compared to in-situ fixed maintenance. • Optimization: Ongoing advancements, such as lighter platform designs (e.g., spar buoys or semi-submersibles) and better installation methods, are necessary to increase the overall efficiency <i>(more reference info in letter)</i>	Thank you for your comment. As this comment does not contain a recommendation, no change has been made to roadmap.

Name	Comments	DLCD Response
BlueGreen Alliance	Addendum B: How to Ensure Local Jobs: HB 4080 Labor Standards+ additional provisions In response to questions/concerns on local vs out-of-state jobs from a potential Oregon Offshore wind, below we aim to explain how key workforce provisions further ensure opportunities for Oregonians. Training Agent Requirement (Apprenticeship) A state-approved apprenticeship training requirement ensures all applicable employers must be a registered training agent and be linked to an existing training program registered with the Bureau of Labor and Industries before the start of construction. Apprenticeship utilization goals By definition, apprentices in Oregon have to demonstrate Oregon state residency or must be linked via an inter-state agreement. Therefore, apprenticeship utilization rates further ensure setting goals to hire, train, and retain Oregon trainees. HB 4080 (2024) states that all contractors and developers involved in construction, operations or a maintenance must set a utilization goal of 15% of apprentices. Hiring, Training, and retention plans for Women, black, indigenous, People of color, and veterans HB 4080 (2024) requires developers and contractors to “establish and execute a plan” a plan to outreach, recruit, and retain women, indigenous, people of color, and veterans. Prevailing Wage The original intent of state of Oregon’s prevailing wage laws was to set a level-playing field between Oregon contractors and out of contractors by setting a state minimum wage standard per classification/trade that eliminate lower wages as a competitive advantage for out of state construction firms or firms with workers willing to work for lower pay. Family Health and Retirement HB 4080 (2024) sets a requirement for all developers and contractors to provide family health and retirement on offshore wind projects. Setting a family health and retirement provision in the legislation further ensures an incentive to attract and retain Oregon workers whose career decisions may be limited by family or medical conditions.	Thank you for your comment. As this comment does not contain a recommendation, no change has been made to roadmap.

Name	Comments	DLCD Response
	Project Labor Agreements HB 4080 (2024) further calls the use of project labor agreements (PLAs)— pre-hire construction labor agreements— between developers, contractors, and labor. PLAs may include provisions such as local or targeted hire—such as targeted specific coastal communities or zip codes.	
Oregon Trawl Commission	Concerns with Offshore Wind Offshore wind energy (OSW) may be developed with minimal impacts to marine ecosystems and fisheries if sited in areas with low biological productivity and limited fishing activity. However, the U.S. West Coast. This ecosystem is one of four Eastern Boundary Upwelling Systems in the world, where the natural upwelling phenomenon drives exceptional marine productivity. Although these regions cover less than 1% of the global ocean surface, they produce approximately 20% of the world’s commercial seafood harvest.¹ This fact underscores the importance of protecting this unique marine region from industrial development. Developing offshore wind energy in a highly productive ecosystem such as the California Current Ecosystem risks disproportionate environmental and economic impacts, particularly given the unprecedented scale of the proposed development. Key concerns include: • Pink shrimp impacts: Electromagnetic field (EMF) from offshore wind submarine cables may affect pink shrimp similarly to observed effects in lobster, where its larvae exhibit deformities and reduced swimming capacity, impairing survival.² • Crab behavior: Brown crab have been observed to become disoriented and “mesmerized” near offshore wind submarine cables due to EMF exposure with potential impacts to its feeding and mating behavior; similar effects are likely for Dungeness crab.³ • Marine mammals: Numerous species inhabit the West Coast, including the ESA-listed humpback whale. Suspended submarine cables within floating wind arrays could pose entanglement risks, including secondary entanglement from debris. Additionally, wind arrays located along migratory routes may displace whales closer to shore, exacerbating interactions with the Dungeness crab fishery.	Thank you for your comment. These concerns are reflected in the full enforceable policy assessment in Appendix A.

Name	Comments	DLCD Response
	• Bird and bat mortality: Wind turbines pose well-documented collision risks to birds. There are concerns with the ESA-listed short-tailed albatross along the West Coast. The groundfish fixed gear fishery is strictly managed with respect to this protected species and is authorized to impact an average of just two birds over a two-year period, after which severe regulatory consequences are triggered.⁴ Bats are also vulnerable, including to barotrauma. The endangered hoary bat has been documented within the Humboldt offshore wind energy lease area off California.⁵ • Upwelling disruption: Offshore wind farms are found to reduce wind speed and can alter oceanographic conditions, including reducing upwelling and increasing coastal water temperatures, potentially intensifying marine heatwaves and undermining the productivity that supports the entire marine food web.^{6, 7, 8}	
Oregon Trawl Commission	Additional concerns include habitat alteration and loss (including fishing and spawning grounds), displacement of the fishing effort, port impacts, underwater noise, increased underwater turbulence during construction and operation, degradation of coastal ecosystems, water column contamination with oils and lubricants contained in the turbine and PFAS (forever chemicals) contained in the blade aerodynamic additions, introduction of invasive species, among other. OSW development also presents specific risks to trawl fishing operations, which rely on mobile gear deployed along the seafloor or through the water column. Any infrastructure in the water (i.e. floating submarine cables) or on the ocean bottom, including what has not been properly buried or has been left after partial decommissioning, poses a significant entanglement hazard, risking gear loss, vessel safety, and restricting access to fishing grounds	Thank you for your comment. These concerns are reflected in the full enforceable policy assessment in Appendix A.

Name	Comments	DLCD Response
Oregon Trawl Commission	The following comments focus on several key issues which we believe require further clarification or refinement in the Roadmap: development pathways, safety at sea, decommissioning, Table 6-4: Offshore Wind Energy Roadmap Action Prioritization Summary, and interstate impacts. Pathways We appreciate the inclusion of both a “no development” and a “pilot project” pathway. Given the sensitivity and productivity of the California Current Ecosystem, it is essential to retain an option that allows for a thorough evaluation of whether OSW development is appropriate in this region. If development proceeds, a pilot project should be prioritized. For the “1 GW to more than 3 GW” pathway, we recommend revising it to “1 GW to no more than 3 GW” to align with the legislative intent of House Bill 3375 (2021), which established a planning goal of up to 3 GW of floating offshore wind energy in Oregon.	Thank you for your comment. As mentioned in the Roadmap Table 4-7 (Callout: Should Oregon Place Preemptive Limits on the Scale of Development?), The 3 GW planning target established in HB 3375 represents neither a mandate to procure offshore wind energy nor a cap on the total amount of development possible. The callout presents the discussion that occurred within the Roadmap Roundtable advisory group as they considered whether to recommend establishment of a cap on development potential as state policy, but no consensus was reached. The Roadmap recommends that this question is appropriate for discussion within a more formal policymaking setting.
Oregon Trawl Commission	Safety at Sea The Roadmap should address how radar interference from offshore wind turbines will be managed. Turbines can create radar clutter, potentially obscuring structures or other vessels on radar systems.⁹ This presents serious safety concerns for fishermen, as well as for the U.S. Coast Guard navigation and search-and-rescue operations, especially during foul weather.	Thank you for your comment. These concerns are reflected in the full enforceable policy assessment in Appendix A.
Oregon Trawl Commission	Decommissioning The Roadmap should require full decommissioning with no infrastructure left in place. All equipment, including submarine cables and turbine anchors, must be removed and the environment must be restored to its original condition. While federal agencies such as BOEM and BSEE require full decommissioning, they retain discretion to allow partial removal of structures. According to BOEM’s 2022 decommissioning guidance for offshore wind projects, lessees are required to complete decommissioning within two years of lease termination, unless “BOEM has authorized the facilities and installations to remain in place or be converted to an artificial reef”.¹⁰ The state should consider how such federal decisions align with	Thank you for your comment. No change to roadmap.

Name	Comments	DLCD Response
	Oregon policies and clarify responsibility for any infrastructure left behind. Over time, equipment that has been buried would likely become exposed and be moved by the strong ocean currents. It would pose serious safety risks to trawl fisheries due to their use of bottom-contact mobile gear, creating ongoing hazards of entanglement, gear loss, vessel safety, and restricted access to fishing grounds.	
Oregon Trawl Commission	Table 6-4: Offshore Wind Energy Roadmap Action Prioritization Summary The table 6-4, which spans pages 160 through 168 of the Roadmap, includes 82 action items, with fisheries listed starting at item #62. It is unclear whether the table reflects a prioritization order. If it does, fisheries and the environmental considerations should be moved to the top of the list, as the fishing industry is the most directly impacted stakeholder group, along with the environment it depends on. If the table is not intended to reflect priority, this should be clearly stated in the title or accompanying text to avoid future confusion.	In Section 6.8 (Assessment of Recommended Roadmap Actions), Table 6-7, formerly Table 6-4, has been restructured to remove the sequential numbering and address concerns that they represent any form of prioritization.
Oregon Trawl Commission	Interstate Impacts Two large-scale floating offshore wind projects are currently in early pre-construction stages off Eureka, California, authorized by BOEM in 2023. These projects are located less than 100 miles south of the Oregon border, including from the previously proposed Brookings Wind Energy Area. Given the proximity of these developments, impacts will not be confined by state boundaries. Oregon fishermen—particularly those operating near the California border or in California’s federal waters—may be affected by these California-based projects. In federally managed fisheries such as West Coast groundfish, vessels are permitted to fish across the entire West Coast. Similarly, Oregon’s pink shrimp vessels operate beyond typical state boundaries into offshore waters. For these reasons, interstate impacts, including cumulative impacts, should be addressed in the Roadmap and in state planning efforts.	Thank you for your comment. DLCD agrees that offshore wind energy decisions in Oregon would affect and be affected by other projects within the California Current Large Marine Ecosystem and the spatial range of ocean users such as fishing communities. The Roadmap recommends a number of actions to address regional cumulative effects, including a requirement for a cumulative impact assessment prior to any future leasing, assessment of community impacts from proposed projects as part of mitigation and community agreements, and regional science collaboration to better understand the interconnected and regional nature of potential offshore wind energy development impacts. The Roadmap also recommends a state-led marine and coastal spatial planning inventory process, inclusive of federal waters, to identify areas of high interest to the state including high-value ocean uses.

Name	Comments	DLCD Response
Water League	The provided 123-page comment may be found via the following link: https://www.oregon.gov/lcd/OCMP/Documents/Water-League-Public-Comment_OSWRoadmap_042226.pdf	Thank you for your deeply researched and reasoned comment. DLCD will not respond directly with an assessment of the thesis of the provided paper but rather focus on the ways in which it intersects with the purpose and output of the Roadmap. It is true that all energy generation systems produce waste, be it physical/material, thermal, chemical, radiological, or other indirect externalities. Studies have been performed to estimate the Energy Return on Investment and embodied carbon of various energy generation technologies, including offshore wind energy. This research continues to be refined based on experience over time and as technologies mature. The Roadmap does not assert that carbon avoidance is a sole or sufficient proxy for long-term energy and ecological sustainability. The Roadmap also intentionally does not refer to offshore wind energy as “renewable”, “green”, “clean”, or other similar adjectives that may assign value. Instead, we use the term “non-greenhouse gas-emitting”, which is accurate in regards to the operation of the turbines themselves but does not encompass the carbon costs associated with materials and support operations throughout the entire lifecycle. The Roadmap does recognize the potential effects of waste production and dispositioning to Oregon coastal communities that lack infrastructure and landfill capacity to accept large components at the end of their operational life. The Roadmap recommends in Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) that any future permit application be accompanied by a comprehensive waste management plan. The Roadmap also addresses many other types of effects related to offshore wind energy development that may fit the definition of “phenomenological waste” described in the comment – be they effects to the environment and species, coastal economies, or diminished social or cultural value. For each, the Roadmap considers policy recommendations and actions the state can take to avoid, minimize, mitigate, or compensate for losses, to responsibly and equitably balance the benefit and “waste” resulting from new energy development of this kind and result in the most achievable good for Oregon and its communities. A central theme of the provided comment appears to be that society needs to “draw down” physical waste production generated by energy

Name	Comments	DLCD Response
		systems that are characterized as renewable. Similar points have been raised throughout the Roadmap development process, noting that reduction of energy demand is an important action to reduce the scale of the “problem” that renewable energy sources attempt to address. DLCD acknowledges this point while also maintaining focus on the purpose of the Roadmap to define standards to be considered specifically for offshore wind energy-related decisions and processes. Energy demand reduction or control represents a larger social, political, and technological challenge beyond the scope of the Roadmap, or other similar efforts by state government to address the energy usage of the state and maintain the resiliency and reliability of electricity access for Oregonians while also meeting state climate goals.

Table 3. Public Meeting Comment and DLCD Responses

Name	Comments	Draft Final Response
--	Virtual meeting #1: No comments during 2/25/2026 virtual meeting	
--	Newport meeting: No comments during 3/3/2026 Newport meeting	
Scott Kent	Reedsport meeting My name is Scott Kent. I'm the district manager for the port of Umpqua, and I just wanted to reiterate our stance that we took a poll last year, and the port came down against wind energy, and I just wanted to reiterate that with the public comment. That's it.	Thank you for your comment.
Donna Train	Reedsport meeting Donna Train from the Port of Umpqua and I wanted to thank you for coming. I think this is the first time you've come to Reedsport. Is it? Yeah, okay, I think so, and I really appreciate it because I couldn't get down to the Coos Bay meetings, but I heard they were wild. So, anyway, my concern is right now our electric bill. And just like what he said, I think it's around 10 or 11 cents per kilowatt hour and Reedsport just put in some charging stations and the charge for that is going to be 32 cents a kilowatt hour so that's just now, you know, for senior citizens. Right now, we're paying about \$180 a month for electricity and that's at the lower rate. So that is a concern, and the other thing is we have a wonderful commercial fleet out here, and when I've heard discussion about the Coos Bay location, when I looked at the map, it's right off of our Coast and when you talk about all of the lines and everything that would go it would take a huge effort for our commercial fishermen to be able to continue their crabbing. That location is right in the prime commercial crabbing area, and for Oregon, that's one of the highest incomes for Oregon. Now our timber industry, we don't have any mills in Reedsport anymore. We used to have sawmills and plywood plant and our paper mill, we don't have that now, so the commercial fishermen are our family wage jobs. That's just a real concern on my part for our commercial fishermen and let me go. When you talk about these platforms, we get huge, mile-long kelp, seaweed, groups that come in in the ocean and years ago, we talked	Thank you for your comment. The concerns you expressed are ones DLCD heard consistently throughout the Roadmap development process, and the Roadmap attempts to respond through recommended policies and actions that would: - further evaluate the cost and benefits of offshore wind energy through additional analysis in the Oregon Energy Strategy - require full financial transparency prior to power procurement, including effects to ratepayer bills if power is sold in Oregon - a suite of measures intended to protect Oregon fishing communities, including policy amendments to clarify areas to avoid; a state-led spatial planning inventory process to identify areas in federal and state waters of high value relative to state protective policies; fishing community agreements, mitigation measures, and compensation as part of the permitting process; establishment of a state offshore wind science collaborative that includes fishing communities and their concerns; and ongoing engagement with fisheries working groups throughout the process. - hazards and recovery planning as part of the process, with accountability measures built into state decisions for offshore wind energy projects in the event of unexpected failures. To answer the question about how long turbines will last, it cannot be stated with certainty, but one industry representative participating in the Roadmap process offered that companies assume every major component of an offshore wind project (i.e., not including the platform, mooring system, and mast) are estimated to be replaced

	about the wave energy. And the people that we're talking about didn't realize how heavy that is. The equipment can be completely between the ocean waves and the weight of something like that you could lose your whole barge. You know. And they're long, really. Well, it's just something that I wanted to share with you. And also, I wanted to ask, how long will the turbines last? How often do they have to be replaced? And I just appreciate you being here. When you talked about, this is another question. Well, you didn't say the word imminent domain, but I got the impression that it can still happen, even if it's not something that the public wants. Okay, yeah, and that's it. Thank you very much.	one time during a project's 30-year lease operation span. The Roadmap recommends waste management planning as part of the permitting process and acknowledges the potential impacts and needs related to port infrastructure to perform regular maintenance of turbines.
Michelle Carrillo	Brookings meeting Hello, Michelle Carrillo. I grew up here in Brookings. So, taking a look at this and just kind of consorting what everybody has said and then, also, I've gone to several meetings, not as our roadmap member, but just as a general public [as] a person watching the process and then engaging in this. I think one of the things that stuck with me was about seeing the effect, and that if we see the effect as a state in any of these Alternate Futures, that if we don't have a policy that is a bad outcome and so, how? I understand your framing around this is a recommendation document, but if I was a decision-making seat reading this document I would want to hear from you what are the things that if you say each one of these was a good outcome must happen? And like, be that clarity of prioritization of not just these should happen, and this should happen and where, but thinking about, are there these critical points. And if we say we don't want offshore wind and we don't go forward with this, but our neighbors to the South are, which I'll tell you in California, it's a very different process, and there's a lot more movement going because those leases are live. That's not that far down the coast where it's happening. What does it mean for our ports? What does it mean for development, our workforce, our fleets? And are the critical things that we need to be really looking at of what is the most likely scenario? Is that okay, Oregon's not going to have this, at least not for quite a while. But if it is very likely happening in California in the next 10, 15, 20 years, well, we better make sure of those options that the port build-out. The way that we're looking at these, that those are really well developed and clear and then we're working with all those	Thank you for your comment. In response to the points made here and in other comments DLCD received, the section of the Roadmap around economic development (Section 6.6, Create Economic Opportunities and Sustain Local and Regional Economies) has been revised to emphasize the factors that influence supply chain demand, the potential for port infrastructure investment to support offshore wind energy development in the region, and the role state investment can play in facilitating the development of economic opportunities whether or not the state hosts offshore wind energy projects off the coast.

	partners and making sure we're clear about the resourcing needs for each of those pathways. For example, what is a well-resourced plan look like to actually do feasibility studies with our ports. And actually, look at that a lot along our coast and coordinate with those other ports. I loved seeing the port relationships that are happening between Humboldt port and the Coos Bay port when I was at the Sea Grant event. I think more of that kind of work where we're working regionally across the coast. And I'll just say I really am excited to see the youth inputs and those presentations and how those get brought forward and are held clearly that this is also what our youth are talking about because our young people, they're living this right now, and they will be the ones that are working through this in the future and having to make a lot of these decisions and making the tough calls later on. Thank you, thank you.	
Jay Trost, County Commissioner	Brookings meeting Jay Trost, Curry County Commissioner. My feedback is that the overwhelming nexus of all of these meetings that I've virtually attended in person have been rooted deeply around concern and I really, really hope that the committee does those concerns justice when portraying them in the roadmap to legislation. I understand the committee was under a directive to create a roadmap on sustainable wind energy. And I think just like we often do in government with ready fire aim, the true discussion should have been, should there even be a roadmap? Towards this, there is consensus to even develop the roadmap instead of just jumping into a giant fund to create one. And I think the overwhelming consensus would often be no, the roadmap needs to have a dead-end period point, like, stop at the beginning. And I think that that would be very much the consensus. And not all roadmaps lead to a destination that's favorable to the funder's outcome. And, that this committee who's tasked with an incredible job of trying to canvas these communities to create feedback in generating a roadmap. We'll have the courage to say this road map is truly a dead end. This roadmap really has no destination. The feedback of the communities is that this isn't healthy for anyone. And, that we hope that we haven't done you injustice by listening to the communities to that level and created something that is a false	Thank you for your comments. DLCDC appreciates the point that the Roadmap should reflect south coast community preferences and the outcome of the 2024 referenda in Coos and Curry Counties. In Section 2.2 (Offshore Wind Energy: Oregon Overview), new language has been included to discuss the referenda, and this comment is quoted as follows: <i>In November 2024, Coos and Curry counties each passed ballot measures advising county officials that voters want them to oppose offshore wind turbine projects in their areas. The measures were approved by 60 percent and 80 percent, respectively. While local ballot measures can't be used in state review processes as a basis to object to a project, they signal significant opposition to offshore wind energy among voters. During the Roadmap development process in 2025, south coast residents and public officials participated in community meetings. Many attendees reiterated their opposition to offshore wind energy development due to a variety of concerns around environmental and community effects, with one county official describing the Roadmap as, "... a dead end [with] no destination."</i> A new section has also been added within Section 2.4.2 (Oregon Regulatory Framework for Offshore Wind Energy Project Reviews) to specifically discuss the local government role in the offshore wind energy regulatory process.

	narrative not based and rooted in community feedback, but based on subjective ideas that we were tasked to create. So, I wish you well, and I hope that you're able to do that. Thank you.	
Lynn Coker, County Commissioner	Brookings meeting Thank you very much. The backdrop for my comments has to do with Curry County in the last five months has provided to the Department of Land Conservation and Development 10 different risk factors that are substantial and if they aren't addressed represent crippling events to our South Coast culture, our South Coast communities, our South Coast Industries onshore and off. Those 10 had never been addressed. There's never been a response. In addition, it is within the last 60 days. Maybe it's like we have submitted itemization of structural bias observed in the Department of Land Conservation Development roadmap process that imbalances through the process itself. It imbalances the voice of the local communities and the tribes in favor of administrative agencies and the executive branch in the State of Oregon. <i>I'm going to add three more items to our list of 15 items that have been unaddressed.</i> <i>The first item</i> tonight is within the framework of the roadmap, the roadmap must require that the developers work to provide what is called the financial reformer on their development project that illustrates the financial risk and/or the financial benefit to rate payers and taxpayers so that the average homeowner who pays property tax, the average kid is finished in high school that pays his first income tax, they understand what's going to happen to their bill over the life cycle of these developments. <i>The second thing</i> that everybody out there with is that rather than the state pushing back on the global community relative to the risk associated with these projects that the state look to the local community to be the author of the credentials associated with giving a development permission to move forward. That would mean the dominance of our local land planning, our local ordinances, and the local referenda that comes from the local communities becomes the lion's voice rather than the tail in the process. <i>The last thing</i> is that, and Michelle brought this up wonderfully, we need to stop using "shall". Oh, pardon me, consider study analyze. We need within the framework of the roadmap to say a developer "must"	Thank you for your comments. DLCD notes that similar comments were submitted in writing and are specifically addressed elsewhere in this appendix. As a result of this comment, a new action has been added to Section 6.2 (Achieve State Energy and Climate Policy Objectives) recommending that the state require financial transparency measures prior to any power procurement from offshore wind energy in the state. The Roadmap also includes a new subsection within Section 2.4.2 (Oregon Regulatory Framework for Offshore Wind Energy Project Reviews) to describe the local role and authority over portions of wind energy projects or associated support infrastructure that are within their jurisdiction. Additionally, the Community Agreement framework and policy recommendations in the Roadmap may provide an additional mechanism by which local community interests can be formally represented within future permitting processes, if implemented. Regarding the comment about the use of "shall" versus other words like should, consider, etc., DLCD considered the appropriate wording to use in the Roadmap, given that it is not itself a policy setting document. DLCD's determination is that the Roadmap should remain a recommendation document and leave it to subsequent formal rulemaking or legislative processes to establish the standards identified in the Roadmap.

	meet these criteria. For instance, the developer must meet a criterion that there is no harm to our ocean one species at a time. For whales, if we find that there is a decrement to the life cycle of whales as a result of these developments, then the development stops. It must not. Think about it, not study it, but you put a solid collar on each of these indices that represent harm to our communities. Thank you.	
Christopher Hall Water League	Brookings meeting Thank you for this opportunity to comment on the draft offshore wind energy road map. My name is Christopher Hall. I'm the executive director of Water League. These comments are general in nature; our written comments will be far more comprehensive. We challenge the prevailing assumptions that renewable energy inherently mitigates environmental and societal harms simply by avoiding carbon diffusion. Overstated claims of renewable energies, benign sustainability, obscure significant negative externalities, including ecological degradation, economic inequality, resource extraction impacts, social mollese, and other forms of unacknowledged waste generation. Offshore wind energy is the most ostentatious display of this overreach. Whereby those leveraging capital to address the serious problem of carbon diffusion legitimize large-scale industrial interventions with renewable, if not incessant, collateral harms. Regarding the renewable energy sector, the energy the industry must stop conflating the term renewable, which means incessant with the terms clean and green in their effort to provide political cover for the degraded waste associated with renewable energy systems, including the erection of 853 foot tall, leviathan-like turbines that produce waste energy as ceaselessly as they generate perceived benefits. The theoretical ceiling for renewable energy waste production is limited only by mining inputs. However, every perceived benefit from concentrating diffused energy from the sun and the wind will always be matched by an unavoidable rediffusion of lower quality waste energy, some, if not too much of which will manifest as harm over time. Humans may die in our own waste before we run out of the Earth's crust to grind to make our bread. To be clear, Water League does not align with or support the fossil fuels sector, which is a leading special interest critic of the renewable energy sector, though we acknowledge the pervasive systemic reliance people have on fossil fuel products in our current global economy.	Note: This comment was followed by a written submission that expands on the points made during this meeting. Please see the response to the expanded comment in another table within this document.

	We acknowledge the urgent necessity of decarbonizing energy systems and drawing down legacy carbon from the atmosphere and oceans. But not without also critiquing the unexamined assumptions and structural blind spots that accompany many renewable energy proposals. Especially when carbon avoidance is treated as a sufficient, if not the sole, proxy for long-term sustaining sustainability. Thank you.	
Ann Vileisis Kalmiopsis Audubon Society	Brookings meeting Hello, my name is Ann Veleisis and I'm speaking tonight as president of the Kalmiopsis Audubon Society. Kalmiopsis Audubon Society has 400 members in Curry County or a little bit more who care about habitat and birds for birds, fish, and wildlife. So, we support the need to deal with climate change. But we remain highly skeptical that floating offshore wind is the best way to go, especially off our rugged stormy coast that is actually one of the most productive upwelling ecosystems that draws birds, fish, and wildlife from all over the Pacific and already supports sustainable fisheries. I want to thank DLCD for the work that you've done on the roadmap because I do think that this process puts us into a better place than we were a couple of years ago when BOEM was pushing really hard to get those wind energy areas in our offshore waters. I want to thank you for listening to communities and fishing groups and tribes for including alternatives that don't put turbines in the water. That's super important, and I know that you're going to hear from other places or other people that the roadmap should just be going to develop wind energy, but, I think, the group heard again and again that local communities would like to have an alternative and so you're hearing that again tonight, so please keep that in there. I also want to thank you for including the recommendation that we need a far more robust cost benefit analysis of floating offshore wind energy compared to other forms of energy that the State of Oregon might be able to look for before we go forward in investing a lot and floating offshore wing energy. I strongly support one of your top recommendations, which is to amend our Territorial Sea Plan so, the policies and the plan - this goes along with what commissioner Trost was saying, that we need to change our policies - we need to do that right now, so that will put us in a much better position. So, when BOEM comes back, if it comes back	Thank you for your comments. The recommended action around further cost-benefit analysis has been expanded and revised based on this and other similar comments, as well as discussions at the May 2026 Roadmap Roundtable advisory group meeting. The concerns expressed about meaningful engagement are well-taken, as well as the point emphasizing the opposition expressed in the 2024 county referenda. Local community opposition is now included in the discussion in Section 2.2 (Offshore Wind Energy: Oregon Overview), and the Roadmap also includes a new subsection within Section 2.4.2 (Oregon Regulatory Framework for Offshore Wind Energy Project Reviews) to describe the local role and authority over portions of wind energy projects or associated support infrastructure that are within their jurisdiction. Additionally, the Community Agreement framework and policy recommendations in the Roadmap may provide an additional mechanism by which local community interests can be formally represented within future permitting processes, if implemented. Section 6.1 (Effective and Meaningful Engagement with Affected Communities) of the Roadmap also contains a new action recommendation concerning the creation of a community engagement support fund that could be accessed by local community organizations and others to facilitate engagement and participation in future offshore wind energy-related processes.

	in the future, then we have much stronger policies in place. I appreciate in the roadmap that one of the goals is to have meaningful engagement. But I remain concerned about how, what meaningful engagement will look like when we have our communities here on the south coast that have voted overwhelmingly 80 percent in opposition to this. That if we just keep talking about it but are not heard about it, people don't feel like that's meaningful engagement. So, I know it's a nice word, or it's a nice sentiment but what does it actually mean, and so I remain concerned about that. In any case, that's it. I'll be submitting more substantive comments as well. Thank you.	
Tim Palmer	Brookings meeting Let's see. Thank you! I'd like to say that I support wholeheartedly our conversion from fossil fuel to renewable energy resources, we simply have to do this if we're going to have a planet worth living on. However, as I alluded to my question to you, which I think you answered very well, Jeff. The question is, what's the best way to do that? And your answer was that you're not authorized to look at all the alternatives. I understand that that's a good and adequate answer, I think. However, let me just say that that I think there's a lot of evidence that if we did look at those alternatives, we find that this one is by far the most costly. It's by far the most damaging to the environment, and that by far serves the major power centers of need the least in America. And so, you know, we need to do renewables, but this is not the way to go. Thank you.	Thank you for your comment. Because the Offshore Wind Energy Roadmap's original purpose is to define standards to be considered in offshore wind energy decision-making and related processes, DLCD has decided to not include a high-level comparative analysis of offshore wind energy against other potential renewable energy options. Such an analysis would require substantial additional research and space in the Roadmap document to perform accurately, and DLCD determined that this analysis is more appropriate to be conducted by the state's energy department. Section 6.2.3.1 (Action: Continue to refine the <i>Oregon Energy Strategy</i> to reflect changing conditions in offshore wind energy technology and the regional energy market) recommends additional refinements to the 2025 Oregon Energy Strategy, to further compare renewable energy options across a range of dimensions.
Rep Court Boice	Brookings meeting So, Mayor Pereda, Commissioners, thank you very much. I will probably say most of my comments were made on the house floor because we know it's coming again. Correct me if I'm wrong, the developers left for three primary reasons. Shall I say, pun intended, pull the plug. Number one, deep water, which we don't have the technology. I want to emphasize that. That's kind of our ace in the hole; one of our aces in a hole. Number two, the public sentiment. Destroying our ocean. That's all been covered here tonight. And number three, you can get the storms that we have in late fall early-winter off the coast of Oregon. You go, you go to the western part of Europe where the water is shallow, and they don't have the storms, their success is at very large, and not to mention what it is to the wildlife. You know you heard the president	Thank you for your comment.

	just about 10 days ago say if offshore wind is so good, why aren't the Chinese who are really great developers, why aren't they putting that offshore in their energy grid system. So, they fired (?) from a new coal plant every week in that country. So, uh, I just want to emphasize its coming back. At least we need to prepare for that as said earlier. We need to be on our toes because there's a lot of people out there that do not agree with the majority of people in this room. And so, I want a commend on the job that you've done. You did exactly what the legislature asked you to do. There's were multiple reasons I voted against 4080, but I think you've come to the South Coast, and of all the five cities you've been to. I'm sure Brookings is your favorite?	
Thena Lyons	Brookings meeting Okay, it won't take you that long. Okay. Okay, so I'm going to follow Jay's queue by putting a policy together. So, the first policy I would like is, if you guys are going to bring people in that you're trying to convince, like I talked about before, bring opposing scientists in. Ones that don't believe in any of this crap. Okay, I think you owe it to the people to at least be a little more fair. The second one is the policy should be, you need to know in advance what our power bill is going to be, and if you can't, then that's like, a that's a game stopper. And then you did mention Jeff that you look at credible information. I'm not concerned about credible; I'm concerned about accurate, and if you can't be accurate, that's a non-stopper also. And that's all I got.	Thank you for your comments. The recommendation to include a range of views in the state-led science collaborative has been added to the action description in Section 6.3.2.5 (Action: Establish a research collaborative to build Oregon-specific scientific consensus around offshore wind energy research and science needs). The recommendation to know what offshore wind energy consumers' power bills will be, has also been included as part of a new action in Section 6.2.3.4 (Action: Require Financial Transparency and Lifecycle Cost Disclosure prior to project procurement approval) recommending that the state requires financial transparency and disclosure prior to offshore wind energy power procurement.
Matthew White	Brookings meeting Matthew White, president, local business owner. I'm not as versed as many of you. This is my first meeting. I'm glad that I came with my son. I do want to thank you for all your hard work on this. I do think it's important that we keep our youth involved because they are the ones that are going to be taking over this mess if it happens. As far as voicing my concerns, I'm concerned about the largest windmills ever made and produced, floating off of our shore with hurricane force winds that we get every year, getting destroyed, getting pushed in, destroying sea life, destroying fishing grounds, whale migrations, etc. I just thank you again for your hard work. I think that the negatives far outweigh the positives on this matter though, so I personally don't hope that it goes through. Thank you.	Thank you for your comment. Your preference of alternative future paths is included in the final Roadmap. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future. Additionally, the Roadmap recommends a state-led siting process that may address the interests reflected in your comment.

Earl Huett (?)	Brookings meeting Good evening. My name, can you hear me? Okay, my name is Earl Huett. I'm Modoc Paiute. I was raised here on the West Coast all over from, Columbia Gorge to Alcatraz, you know down San Francisco. We go to all the ceremonies and all these things, you know, and I really think the tribes need to be more involved in what they is said here on, you know, there's not a lot of cultural representation here on the north or the south coast, I should say. But, you know, we were here before, and we're still here now. We still should have a say of what's going on to our culture. Everything is going on, you know, from our land to water to the animals, mammals, and all those things and the people. So, I'd like to see and hear about more tribal contact and tribal input because I know there'd be just as much negative as there is here. And I totally stand against it because of the environmental impact and all those things that do go on. I just watched the video, you know, you talk about people who could have to go out there back and forth to service these things. I just seen a video of a clip of those guys out whale watching, and somebody accidentally ran whale over and this, whale, she's freaking out, bleeding all over. How many could be in jeopardy out there, you know? All of our mammals, you know. I've seen the one in Washington, Columbia Gorge. How many eagles that thing is killed out there, knocking them out of the air because they're spinning so fast when eagles don't have time to fly by. You know, there's a lot of things that are happening that's not being brought up and so, we need to hear all the stories and from all the people. So, I want to thank you guys for coming here tonight, and letting us come up here and talk too, because it means a lot to hear all the comments and from everybody. So, thank you, thank you.	Thank you for your comment.
Rob Carrillo	Brookings meeting Hi, I'm Rob Carrillo; lived here for 40 years now! My career was in the marine service industry. Not cartographers, like, you guys. Thank you for coming and hearing our considerations. I'll pose my considerations more as questions for you to consider. Question would be, where does the power from the windmills come from ... wind turbines come to shore, will it be a beach access underground? What? How will that happen? Who owns it? Where's the money? How will the power transmission from them get to the grid	Thank you for your comment. To answer your question, energy transmission cables from offshore wind installations are gathered to an offshore substation (either floating or on the seafloor), from which a lesser number of cables (typically one or two) would extend along the seafloor to shore. Often these cables are buried to not interfere with other uses. Once cables reach the nearshore, they are typically led under the beach via horizontal directional drilling, as is currently done with data cables like the ones currently in existence in Oregon. Upland from the beach, a cable vault with manhole access is installed

	here? We have hard enough getting it to us. I can hardly imagine that our infrastructure is big enough to get it to go the other way. The near-shore environments, the most human impacted ocean environment, and how will this be weighed when choosing placements of the farms? Then, can we put some more meat into the comprehensive coastline development in the roadmap? And the next thing is the return on investment. Where's the money? Where's the energy? What are the economics? Are these things that are going to be on the roadmap? And, what's the offset for fossil fuels from the construction and the maintenance? And as far as what would a net benefit be, actually? So, can it be well defined within the roadmap? Is there a public energy reimbursement policy that we could look at, like, maybe Alaska's? So, in conclusion, the road is before us so too, where does it lead? So, I appreciate building maps figuring that stuff out because I just hate to drive with Google telling me turn left here you missed that turn, turn around, you know, we need a map, so, whether it takes us to wind turbines or takes us away, we need a map. So, thank you for your efforts.	where the subsea cable connects to the shoreside energy transmission grid. Regarding nearshore environment impacts, the state currently has protective policies under Statewide Planning Goal 19: Ocean Resources, the Oregon Territorial Sea Plan, and the statutes and rules under the jurisdiction of the Department of State Lands for the granting of easements for use of submerged lands. The Roadmap recommends a state-led marine and coastal spatial planning inventory be conducted, inclusive of federal waters, state waters, and shore to better identify resources and uses of value relative to state enforceable policies and to influence any future federal siting and leasing process. Regarding the economics and net benefit considerations, the Roadmap in Section 6.2.3 (Strategy: Improve Understanding of Offshore Wind's Potential Benefits and Costs for Oregon to Clarify Investment Decisions) recommends further analysis of the comparative costs and benefits of offshore wind energy, toward a coherent statewide energy strategy, as part of recommended revisions to the Oregon Energy Strategy in the future.
Ruth Dixon	Brookings meeting I wasn't going to say that was anything in my comment. My name is Ruth Dixon and I'm a pioneer resident of Curry County on time related to halfway nearby a marriage divorce whatever. Born and raised here. Here I am now, my coordinator for the Curry County Community Organizations Active in Disaster. And my first thought was wow, when that tsunami hits, that's going to be fun, isn't it? It's not only going to affect the turbines out there, it's going to affect the power that maybe is going to these other applications. Right, and when I heard about - and by the way, I don't envy you guys and your jobs, you all may be like, huge rewards. But the fact is, is, you know, we're talking about... oh, this is going to bring jobs to the Oregon coast. No, it is not. They're going to bring people in to do this work. We already don't have housing. I have a son that works for the county and the daughter of public schools, and they can't buy property in Curry County as they can't afford it. We don't have daycare. We don't have affected medical care, but we're going to bring in more people that we can't support that ... they going to go away. So, I think that the benefits that we're being told are not being	Thank you for your comment. Table A-4 in Appendix A (Enforceable Policy Assessment) describes the many potential effects of concern that arose out of the Roadmap process, including those listed in the comment. These effects were evaluated against state policies as part of the Enforceable Policy Assessment, and the Roadmap recommends policy amendments to address gaps and provide the state the strongest basis to protect its coastal uses and resources if it participates in a federally-led permitting process for offshore wind energy in the future. Additionally, the Roadmap recommends a state-led siting process that may address the interests reflected in your comment. Regarding the point about whether or not job benefits would accrue to Oregon communities, DLCD consulted with labor interest participants in the Roadmap process to gain more information. Any out of state contractor can become a training agent for an existing program. They sign the contract with a local union, gain access to a local traineeship program, and can hire locally from the union. Unions typically have limitations on how many hires can come in from outside the state to have protection for local workforce.

	realistically looked at. And so, I appreciate everyone coming tonight. I'm very glad to see the turnout we got tonight. I think this is really great. So, thank you.	House Bill 4080 (2024) includes apprenticeship standards that would require developers to hire a certain percentage of apprenticeships, tied to the state definition of apprenticeship, which has Oregon residency embedded in the definition. This means there would be practical limitations on how much workforce can be imported, and developers would have to exhaust local resources first. If a community is interested in setting local hiring goals, then Project Labor Agreements or other contractual agreements can set hiring goals locally.
Kurt Englund	Astoria meeting All right, ready? Okay, well, thank you for taking the time to come down here to Astoria. So, my name is Kurt Englund with England Marine Supply. We're based here in Astoria. We're in the business of supplying commercial and recreational fishermen with boating, boat gear and fishing gear. We have another retail store in Newport, one down in Charleston, which is Coos Bay, also out in Warrenton out here we have a life raft servicing shop that's mainly services of commercial fishing industry. And we also have a warehouse inland that does inland sales but also supports what we do on the coast. So, we're a seafood industry support business for the seafood industry, so there's a lot of people out there. There's, uh. kind of representing that today. There are fishermen here and Lori's here with the processors, but you know, for, for our support businesses, um, you know us boat yards, nut shops, engine mechanics, welders, fabricators, a lot of specialized trades people that rely on healthy fishing industry for their living, we're part of that. So, we need our customers' fishing fleet and the seafood processors to flourish in order for them to support our businesses, and then that obviously in small communities affects the whole economy. So, in siting potential offshore wind energy sites, traditional fishing grounds, both commercial and recreational, should not be displaced. They're... they're highly successful legacy industries that shouldn't be jeopardized for another industry; that's viability is uncertain. So, any major economic damage to our traditional coastal Industries, you know, fishing farming, forestry - that's kind of our natural, resource-based Industries - is major blow to our communities. And given our geographic challenges we have with transportation and where we live and whatnot, any significant blow to those Industries, nothing's come in really behind it to that magnitude to replace it. So, tourism is great.	Thank you for your comment. DLCD appreciates the point that effects to fishing communities from offshore wind energy development may extend broadly and include secondary and support industries such as seafood processing and the marine maintenance sector. The Roadmap contains several recommended policies and actions to involve and protect fishing communities in state decision processes related to offshore wind energy development. Among the recommendations in the Roadmap are: - A recommendation to require fisheries compensation agreements as applicable based on project effects (Section 6.6.3.7, Support and require fisheries compensation agreements as necessary to mitigate effects action). This section has been expanded to further describe how the state would approach fisheries mitigation agreements, supported by technical evaluations of fishery value and fishery effects from a project. - State policies in Territorial Sea Plan Part Five already require a cumulative impact assessment as part of an offshore energy permit review, and the Roadmap goes a step further to recommend a cumulative impact analysis at the leasing stage as well. The final cumulative assessment would require consideration of multiple projects. - Section 6.5 (Support Coastal and Regional Communities) of the Roadmap describes a set of recommendations that would allow the establishment of enforceable mitigation and compensation mechanisms for affected fishing communities as well as other affected communities. These include recommendation of a new community well-being policy, information about community needs and impacts to support community agreement negotiations, contractual mechanisms to provide enforceability over time, and the aforementioned

	It's awesome, but if we lose a lot of our core traditional industries, that's... tourism I can't make that up, and it's not... can't take its place. So, in this process, you know, I'm not speaking directly to the steps and the policies and all that, but I just wanted to make sure that on the seafood side consider all the economic factors when... in your plan, so it's very important. And as a taxpayer, I'd like to say the scope and the magnitude of offshore wind and how tall and just servicing those things, make sure we get a return on our investment. So, thank you.	compensation mechanism if other mitigation options are not sufficient. The Roadmap also recommends a state-led marine spatial planning inventory process, preceding future federal leasing, which could be a venue to identify important areas to fishing communities and recommend their avoidance. - The Roadmap recommends inclusion of fishing communities in scientific collaboration work and marine spatial planning, as well as the formation of an offshore wind energy fisheries working group to support the development of memorialized agreements between fishing communities and developers. Language has been added to this recommendation to suggest that this group could also serve as a venue for the state to seek fishing community perspectives on proposed projects during federal consistency reviews and the review of other relevant permits or authorizations. Finally, the Roadmap provides recommendations around how the state can sustain ongoing engagement with fishing communities by supporting existing or new fishing community groups (e.g., FACT, FINE, SOORC) focused on marine energy. - Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) recommends a state-led marine and coastal spatial planning inventory process, which would identify areas in federal waters with resources or uses of high value that may conflict with future federal siting proposals. This would give the state the opportunity to influence and guide where offshore wind energy might be located in the future. - Section 6.6.3.3 (Action: Amend state fishery use protection standards to apply more broadly to environment types rather than specific geographic areas) provides further recommendations to amend state fishery use protection standards to apply more broadly to environment types and has been revised to include examples of types of environments to consider for explicit protection, such as spawning and breeding habitat and benthic substrate critical to crab, shrimp, and groundfish species.
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Lori Steele	Astoria meeting Okay and bear with me, I have my notes scattered kind of all over the place, and I don't have anything formally put together to make comments, so I'm going to kind of wing it. Is also yes, yes, okay, thank you. I'm Lori Steele. I'm the executive director of the West Coast Seafood processors Association. We represent shoreside seafood processing companies in Oregon, Washington, and California. We work up and down the West Coast. We have eight major processing seafood processing companies. I believe four of them or so are headquartered here in the State of Oregon and the majority or most of our companies have operations here in Oregon. We work in state and federal fisheries and on all kinds of policy issues. Thank you for the opportunity. We will be submitting some written comments, so I'm kind of going just on the fly here, and I think what will capture in the written comments some of the things I say today, along with probably a lot more detail once we dig into this a little bit more. I want to just say, first of all, I mean, I think the report's really good. I think you guys did a great job really capturing the fisheries concerns. And I thought those sections on the fisheries and community protections, the, uh, that are outlined in the roadmap, are really good. I thought Oregon Consensus did an amazing job facilitating this process, from what I heard, um, so really, a lot of positive things here. None of this changes our perspective or our position that we are adamantly opposed to offshore wind development in the State of Oregon, and we think under no circumstances should offshore wind development move forward. Towards that end, I really appreciate the no offshore wind development scenario. And the fact that two of the scenarios do consider not moving forward with offshore wind development. I want to emphasize that any actions that are taken with respect to the recommendations in the roadmap need to be done long before siting happens and leasing, for sure, but even before a siting happens. And, you know that all has to be done in order to protect fisheries and communities. I also want to just emphasize, you know, I'm concerned about the lack of engagement from BOEM in this process, and I know that certainly is not anybody's fault at the state level that was kind of their	Thank you for your comments. Your preference of alternative future paths is included in the final Roadmap. DLCD agrees with the point made that an early effort by the state to conduct a marine spatial planning inventory would be most effective to influence future federal siting and leasing for offshore wind energy. Amendment of state enforceable policies to explicitly protect certain types of environments important to fisheries, rather than based on their location, can also serve to provide state leverage in any future offshore wind energy project reviews. Your point about revising the Roadmap over time is well-taken. At present, the Roadmap was supported through funding provided by HB 4080 (2024). Future revisions to the Roadmap may depend on staff and resource capabilities.
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	choice. But I don't trust BOEM at all, and I don't believe for one second that that agency will stop what they're doing in response to anything that the state does or says. They've never done it in the past in any other state, and they're never going to do it. So, I don't really... I'm having trouble seeing how any actions that are taken in this roadmap and things that the state does will actually affect the federal process because they're just going to come in and do what they want anyway. I mean, that was one of the things in your presentation that kind of you acknowledge this could happen anyway. So, that's a big concern of mine, but I do appreciate a lot of the recommendations that were made in the state... in the document. You know, I'm looking at, like, the recommendation for conducting a state-led marine spatial planning process to identify areas, you know, for sighting. I mean, I think that's a great idea, but that would have to happen so far in ahead of any federal decision for it to even be effective. That's where I have concerns because we just don't have, I don't feel like there's really good cooperation with our federal counterparts on this, and I don't feel like there's going to be a lot of respect for what the state wants. Okay, last thing, just briefly, and we'll include this in our recommendations as well. I really feel like this needs to be a living document. I don't want this document to just go up on a shelf somewhere, and yes, the legislature has to respond, but we know how that can go, and that can be years and years and years. In the meantime, I would like to see DLCD or whoever the agencies are in charge, include a process for reviewing the Roadmap and updating it as conditions change over time because it really should be a living document. Everything's going to be changing, you know, with administrations and with other needs and issues arising. So, thank you. Thanks for the opportunity.	
Renewable Northwest	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.	
Scott McMullen	Astoria meeting For the record. Scott McMullen, 864 Irving Astoria. I am just a citizen, not as a roadmap member. In reviewing the draft, I felt like one of the that there in the policy gaps on Table ES-1, Summary of Key Recommendation Policy Actions, I didn't see anything about protection of existing stakeholders, and I think that's really important. I think it should be very similar to Statewide Planning Goal 19. This is a state policy document, and that was a state policy document, and that said, and I don't remember the exact wording I should have brought it, but it talked about protecting areas important to fisheries, important to individual fishing ports, and even cases where low volume but high value catch had to be protected, and I think that's really important because that really applies here. Language, like. "support communities" that's kind of vague, and some people are arguing, well, if we put in windmills and all, be all these jobs for people, that's supporting communities, but I think the what we can have that language, but there should be a separate bullet then for supporting existing stakeholders, those who are already here living. We have Columbia River here, we're right at in Astoria, where we had dozens and dozens of canneries along this River, quite a few in this town. This town was built on fish. They put in a dam. Didn't stop all fishing right away. They put in another dam, another dam, and the trajectory of salmon has just gone down ever since it's a long view is, is that salmon are just a sliver of what they once were, and we need to make sure that offshore wind, we look at the long, the really long view, what is the cumulative effects over 10 years. I think we should wait 10 years past the first turbines in Eureka before we even think about deciding. Thanks!	Thank you for your comments and recommendation. The language in the gap in Table 5-1 (Summary of Policy Gaps and Opportunities Identified in the Policy Assessment) states, "Consider establishing policies for community benefits agreement or similar agreements, including a standard requiring that net benefits either balance with or outweigh the costs to affected communities." DLCD considers the term "affected communities" to be comparable to the "existing stakeholders" recommendation in the comment.

Paul Kujala	Astoria meeting My name is Paul Kujala, Hammond, Oregon. 1715 Southwind Circle, Hammond, Oregon, and I'm also a trawler here out of Warrenton. So, I guess I appreciate all you guys have done because it's my understanding the other states haven't had. this kind of process and for public input and, and so I appreciate that. And, you know, as a trawler, I'm very concerned about it, you know, because you know, you're going to displace us, possibly, or whatever. And, you know, environmental reasons, too, because I think you're going to fundamentally change some things in the ocean and at least in certain areas, if not a broader area, so, I'm concerned about that. So, I'm opposed to it at this point, but I do want to say the other thing I was thinking about is, you know, the processing and fishing for bottom trawl, which is what we do. And, you know, the bottom trawl sectors is a federal fishery, so it's Oregon, Washington, California, and it's contracted to the point either because, well, for a host of reasons, but the processing centers the, uh it's contracted, so Oregon is where it's all left, and so there's very little trawl processing in California or Washington anymore. So, it's kind of like, if you, you know, it's just going to compound it even more so. Anyway, uh, thank you.	Thank you for your comment. The Roadmap contains several recommended policies and actions to involve and protect fishing communities in state decision processes related to offshore wind energy development. Among the recommendations in the Roadmap are: - A recommendation to require fisheries compensation agreements as applicable based on project effects (Section 6.6.3.7, Support and require fisheries compensation agreements as necessary to mitigate effects action). This section has been expanded to further describe how the state would approach fisheries mitigation agreements, supported by technical evaluations of fishery value and fishery effects from a project. - State policies in Territorial Sea Plan Part Five already require a cumulative impact assessment as part of an offshore energy permit review, and the Roadmap goes a step further to recommend a cumulative impact analysis at the leasing stage as well. The final cumulative assessment would require consideration of multiple projects. - Section 6.5 (Support Coastal and Regional Communities) of the Roadmap describes a set of recommendations that would allow the establishment of enforceable mitigation and compensation mechanisms for affected fishing communities as well as other affected communities. These include recommendation of a new community well-being policy, information about community needs and impacts to support community agreement negotiations, contractual mechanisms to provide enforceability over time, and the aforementioned compensation mechanism if other mitigation options are not sufficient. The Roadmap also recommends a state-led marine spatial planning inventory process, preceding future federal leasing, which could be a venue to identify important areas to fishing communities and recommend their avoidance. - The Roadmap recommends inclusion of fishing communities in scientific collaboration work and marine spatial planning, as well as the formation of an offshore wind energy fisheries working group to support the development of memorialized agreements between fishing communities and developers. Language has been added to this recommendation to suggest that this group could also serve as a venue for the state to seek fishing community perspectives on
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		proposed projects during federal consistency reviews and the review of other relevant permits or authorizations. Finally, the Roadmap provides recommendations around how the state can sustain ongoing engagement with fishing communities by supporting existing or new fishing community groups (e.g., FACT, FINE, SOORC) focused on marine energy. - Section 6.3.2 (Strategy: Responsibly Manage Uncertainty and Risk) recommends a state-led marine and coastal spatial planning inventory process, which would identify areas in federal waters with resources or uses of high value that may conflict with future federal siting proposals. This would give the state the opportunity to influence and guide where offshore wind energy might be located in the future. - Section 6.6.3.3 (Action: Amend state fishery use protection standards to apply more broadly to environment types rather than specific geographic areas) provides further recommendations to amend state fishery use protection standards to apply more broadly to environment types and has been revised to include examples of environment types to consider for explicit protection, such as spawning and breeding habitat and benthic substrate critical to crab, shrimp, and groundfish species.
Marie McFarland	Virtual meeting #2 Thank you! My name is Marie McFarland, and I live on the coast, in Lincoln City. I'm very concerned for what I have seen because my understanding was that California was to get 97% of the output of electricity for turbines that are placed in Oregon, while Oregonians only get 3%. Again, about a budget we need to... we would have to incur the cost of the repairs for the batteries, for the blades, for the burial of anything any of the encasements, the land, etc. This would also be a fishing industry and whale industry hit to the Oregon's Coast, and I'm against the administration... doing this, not to mention the fact that our federal administration has said no to this. So, I am adamantly against going on with wind turbines.	Thank you for your comment. DLCD is not aware of the statistic mentioned, but it is possible that offshore wind energy produced off the Oregon coast could serve demand in other states like California. The Roadmap in Section 6.2.1.2 (Action: Address transboundary energy issues and opportunities with California, Washington, and other western states) recommends state leadership-level conversations be held between states in the region to address transboundary equity issues to address how the costs and benefits of energy system development—including offshore wind—can be shared equitably and support affordability in Oregon.

Table 4. Youth Voices on Offshore Wind and DLCD Responses

Team Members	Zoe, Fatima J., and Eden H.
DLCD Response	Thank you for your engagement in this topic and for providing your thoughts on how offshore wind energy might fit into Oregon’s future. You gave a balanced view of the potential benefits and tradeoffs to the economy, environment, society, and cultures along the Oregon Coast. The Roadmap development process throughout has been challenged with balancing these same considerations and seeking “thrivability” under any future scenario. DLCD appreciates the focus your group gave to the concept of a pilot project as a “dip in the pool” approach to weigh the pros and cons of expanded development. While the Roadmap is not the vehicle to decide whether offshore wind energy proceeds in Oregon or at what scale, it does try to reflect the potential strategic advantage of a phased development approach if certain challenges can be overcome. The perspective you offered on visual impacts was valuable, though as you mention, perspectives may differ between different people depending on how close they live to the coast and how they value ocean views. DLCD agrees with the conclusion that no form of energy is going to be perfect, and all energy development decisions will come with tradeoffs. At the same time, we agree that significant effects to the environment should be avoided or mitigated to the extent possible, and that a precautionary approach to introducing new human effects a social-ecological system like the Oregon coast and ocean is a prudent stance.
Team Members	Derica T., Isaac, and Alan
DLCD Response	Thank you for your engagement in this topic and for providing your thoughts on how offshore wind energy might fit into Oregon’s future. You insightfully recognized that energy decisions in Oregon are not just about electricity but also require us to consider the effects to the environment, local communities, and the economy that result from our energy choices. The perspective you offered that some choices seem safe at first, but limit progress later is well-taken and has been a theme of discussion throughout the development of the Roadmap. You provided a nuanced view of the potential future pathways, identifying the ways in which no path is simple. We agree with the observation that full-scale offshore wind energy development carries the most potential risk out of all the options, and addressing that risk requires planning, responsibility, and protection for the people and the environment affected. The recommended policies and actions in the Roadmap are intended to approach the risks of all pathways responsibly. DLCD appreciates the focus your group gave to the concept of a pilot project as a “start small before building up” approach to weigh the pros and cons of expanded development. While the Roadmap is not the vehicle to decide whether offshore wind energy proceeds in Oregon or at what scale, it does try to reflect the potential strategic advantage of a phased development approach if certain challenges can be overcome. We also appreciate the point that “location matters”, which is why the Roadmap recommends a state-led marine spatial planning inventory process to identify the locations in the ocean, nearshore, and shoreline where protected resources and uses may challenge offshore wind development in the future. In summary, DLCD agrees with your conclusion that: <i>Oregon should be careful, creative, and fair. Clean energy is important, but how we build it matters just as much as how much energy it creates. The best path is not just one that produces the most electricity. It is the one that protects community, respects nature, and plans responsibly for the future.</i>
Team Members	Bryce W. and Jake B.
DLCD Response	Thank you for your engagement in this topic and for providing your thoughts on how offshore wind energy might fit into Oregon’s future. Your perspective as coastal residents is valuable, as well as your experience with past attempts to make positive change that resulted in unexpected negative side effects. Energy resiliency as a state and along the coast specifically is an important consideration in Oregon’s future energy choices,

	and DLCD appreciates the emphasis on this value in your analysis. However, we agree that minimization of environmental impact should be a simultaneous goal that directs how the state approaches energy development decisions. The expressed interest in data that is frequent, consistent, and transparent is also a theme that was consistent in the Roadmap development process. You correctly noted that even a small-scale pilot project would require working with the federal government, Tribes, and local communities and considering the potential impact on shoreline and ocean ecosystems. The Roadmap recommendations around offshore wind development are intended to be applicable at any scale. In response to a question that was asked, the Roadmap does consider the potential for hazards such as a Cascadia Subduction Zone earthquake or failures in an offshore wind energy installation and recommends refinements to the state's requirements for emergency planning and accountability in the wake of unexpected disasters. DLCD appreciates the comprehensiveness of the range of interests and concerns discussed in your presentation, and we agree that whichever path we choose as a state, we should choose it in the best interest of our communities, and the generations ahead of us.
Team Members	Agatha P., Juniper W., Mirabella C.
DLCD Response	Thank you for your engagement in this topic and for providing your thoughts on how offshore wind energy might fit into Oregon's future. Your introduction epitomizes how all Oregonians can have a connection to the Oregon Coast and be invested in its protection, while also looking toward the future for the state. Your presentation highlights well the potential opportunity to grow Oregon's blue economy and the limitations of relying on hydroelectric power and natural gas to provide energy for Oregon's future. We appreciate the perspective offered that any of the pathways will present risk in one form or another, and it is the responsibility of Oregonians to weigh the decision of what path to take regarding offshore wind energy and the risks that come with it. Your analysis of the different pathways provides a balanced assessment of some of the key benefits and considerations that come with each, representing both community ideals and practical cautions. The perspective you offered regarding the visual impact of offshore wind energy development was valuable, and we appreciated the comparison to other new visual features people have gotten used to over the years, such as cell towers, barges, and oil rigs. While not all people would agree with this perspective, it is an important one to voice in the process. We also appreciate the emphasis on working with Tribes in any future offshore wind development consideration, to determine together whether development is good for both the land and the people. For each pathway, we appreciated how you weighed the risks of offshore wind energy development against risks associated with climate change – broadening the concept of risk to consider multiple scales.
Team	Fiona Z., Sahasra V., Riley T., and Zirui Z.
DLCD Response	Thank you for your engagement in this topic and for providing your thoughts on how offshore wind energy might fit into Oregon's future. Your presentation was future-focused and recognized the balance between the demands of technological development and an interest in protecting future generations from the long-term health and environmental impacts from energy decisions made today. DLCD appreciates the recommendations you offered for each pathway, including investment in ports and workforce development; strong partnerships with universities, research institutions, Tribes, and coastal communities; and ongoing environmental monitoring to better understand effects and tradeoffs. If full scale offshore wind development occurs, the presentation emphasizes the importance of careful planning of project locations, research to protect wildlife, fisheries, and ocean systems, strong partnerships with tribes and fishermen and coastal communities, and investing in ports, transmission lines, and workforce training, including STEM programs. DLCD agrees with all of these considerations, and they feature prominently in the Roadmap. Thank you for the recommendation to incorporate offshore wind energy into STEM and policy education and to expand youth renewable energy education and workforce training. We agree that if the state pursues a path of offshore wind development, it is important to include Oregon youth in decisions and opportunities ahead.

