

Oregon Offshore Wind Energy Roadmap
DLCD Selected comments and questions for Roundtable discussion – May 2026

1) Role of local government in OSW decision processes

Multiple comments noted the local referenda in 2024 that opposed offshore wind leasing and expressed a desire to see it more prominently featured in the Roadmap and in the formal state decision processes related to offshore wind energy development. Commenters also sought a stronger role for local government standards in determining whether a project moves forward. Commenters also questioned how meaningful engagement would be measured if affected local communities are ultimately not in favor of a project. Multiple comments also emphasized the need for a project to result in local benefit, with ongoing enforceable mechanisms. Together, these imply that the Roadmap needs to more clearly articulate how local voices are included in the process under the policy and action recommendations in the document, and there is value in discussing as a Roundtable whether these recommendations are sufficient within the constraints of state policy and legal structure.

2) Energy strategic considerations

Multiple comments surrounded the theme of whether and how offshore wind energy might fit in the state's strategy to meet its energy and climate goals. Comments mentioned the need for an economic justification to pursue any investment in offshore wind energy development. Multiple comments suggested that developing renewables such as offshore wind energy may not actually further the state's energy and climate goals if the energy is used to meet new commercial demands such as AI or datacenters, promoting efficiency measures or distributed sources instead, and several comments specifically suggested that the state oppose offshore wind energy that would serve datacenters specifically.. Some comments also noted that the State Energy Strategy did not assume any offshore wind energy being part of the state's energy mix to meet its climate goals by 2050 and questioned the value of additional investment. Additional discussion is warranted to decide how to appropriately frame the larger energy strategic conversation in the context of this Roadmap specifically aimed at offshore wind energy. Comments also expanded on the scope expectations for the cost/benefit analysis recommended in the Roadmap, which warrant further discussion.

3) State-led procurement policies

Comments received made divergent recommendations regarding whether the state should pursue policies that enable state-led power procurement for large-scale emerging energy sources like offshore wind energy. Some comments advocated for the risk reduction to developers afforded by increasing certainty that a buyer for power exists, as well as the potential benefit to the state that would come from having another contractual lever on the process (e.g., to support research funding, community benefit agreements, and enforcement after permitting). Meanwhile, other comments expressed concern about committing to energy sources that are not economically beneficial absent subsidies or spreading higher costs among ratepayers, and one comment from Renewable Northwest explicitly stated agreement with the Roadmap's current position of not recommending a

procurement policy at this time. Beyond these comments are legal and structural questions about whether and how a state-led procurement authority might affect the current system of energy economics and regulation in the state.

4) Public options for ownership and oversight

Some comments proposed alternative ownership models such as public ownership or the creation of a new state public body to oversee and administer offshore wind energy development and transmission. This is a topic that has come up intermittently during Roundtable conversations but has not been intentionally explored.

5) Alternative future comparative analysis

Some comments recommended changes or additions in how the various alternative futures are framed, especially alternatives that do not include offshore wind energy. These comments recommended that the Roadmap emphasize the “cost of the status quo” relative to climate goals, the implications for other geographical areas in the state and region, and matters such as energy resiliency and reliability. Further discussion is warranted to be clear about how the alternatives are described in Section 4 and how the benefits and considerations are presented.

6) Siting and Environmental Analysis Timing and Scope

Comments recommended that the spatial planning and state-led science collaborative actions should be equally pursued under all potential futures, including Pathways 1 & 2. Comments also discussed expectations for the scope and scale of cumulative analysis at different points in the process. Further discussion and clarification is warranted.

7) Clarifying port development assumptions in Pathway 2.

Multiple comments discussed the expectations for port development and the need for port planning related to an “economic participation only” future. Some comments expected that major port development should be a part of this alternative, which is currently not included in the assumptions for this path. Other comments doubted the feasibility of this path absent economic certainty provided by Oregon leases for offshore wind energy, and one comment recommended removing this alternative completely.

Table: Representative comments related to the themes discussed above

	Comment
	Role of Local Government
1	State Enforcement of Local Community Protection Standards - Protection and mitigation standards reflected in county-level referenda should be incorporated into state project evaluation processes. - 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.
2	1. Voter Direction In 2024, approximately 80 percent of Curry County voters approved a ballot measure advising county officials to oppose offshore wind projects. The DLCDC assessment explicitly acknowledges this vote but states that such measures cannot be used in state review processes, reducing voter intent to a non-determinative sentiment indicator.
3	The second thing 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 come from the local communities becomes the lion's voice rather the tail in the process.
4	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.
5	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.
6	My feedback is that the overwhelming nexus of all of these meetings that I've attended virtually are in person have been rooted deeply around concern and I really, really hope that the 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 is, is there consensus to even developing the roadmap instead of just jumping into a giant process? 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 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 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.
	Energy Economics, Demand, Alternatives
1	The first task for any project is to show economic justification. That is not being demonstrated for this project. Available information from other off shore Wind Energy installations show that this project will not produce power at a favorable cost. Because of this fact, I strongly oppose the project.
2	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.
3	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 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. More and More and More: An All-Consuming History of Energy. 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. J Environ Stud Sci (2025). https://doi.org/10.1007/s13412-025-01013-8. The advent of social media, blockchain technology, and large language models for 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.”)
4	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 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.
5	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 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. 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. 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.
6	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 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.
7	Multiple youth participants expressed a policy preference for any power produced by offshore wind energy projects to not supply AI or datacenters.
8	New Policies should address: 1) Other Climate Scientists that offer opposing views. 2) The amount of “immediate” financial energy savings for all Oregonians.
9	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 dollars a month for electricity and that's at the lower rate.
10	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 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.
11	56. Please analyze how the development of these offshore wind energy projects will facilitate continued growth in energy demand and consumption, as well as material consumption, and how this will impact the climate and the ongoing ecological collapse. In other words, these analyses must incorporate a discussion of what the energy from these projects will be used to power, and, given that these are public waters, whether providing additional power to these users is in the public benefit. For example, energy projects are often discussed in terms of the number of households they would provide energy for, but the largest consumers of electricity remain industrial users, and increasingly data centers and AI are projected as driving massive demand increases.
12	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."
13	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.

14	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 direct community benefit and grid decarbonization rather than diversion into inefficient or emissions-intensive hydrogen production pathways.
State Procurement Authority	
1	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.
2	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.
3	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 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.
4	Section 6.2: Achieve State Energy and Climate Policy Objectives RNW appreciates that the Draft Roadmap pays close attention to the role that floating OSW can play in achieving state energy and climate policy objectives. However, we have some concerns regarding some of the framing laid out throughout the section. The green call-out box at the top of this section seems to have a clear anti-OSW bias as it lays out challenges that face Oregon’s energy infrastructure “regardless of whether turbines are built off Oregon’s coast.” This is unhelpful, as there are few other non-emitting generation resources capable of meeting Oregon’s growing energy needs at the scale of OSW; RNW sees OSW generation itself as essential to the region’s clean energy transition. We agree with the suggestion in section 6.2.1.1 to pursue regional power market opportunities and transmission planning related to OSW energy. Section 6.2.1.2 suggests addressing transboundary energy issues and opportunities with California, Washington, and other Western states, stating that OSW developed off of Oregon’s coast may be consumed in California rather than Oregon, and that Oregon should address how the costs and benefits of OSW development can be shared equitably and support affordability in Oregon. This is perhaps a misunderstanding of how regional power markets work, and an oversimplification of the behavior of electricity. More electrons on the grid improve resilience and reliability for all. Additionally, greater connectivity with California would allow Oregonians to benefit from renewable energy resources being built at speed in California, like solar + battery storage. The goal of a larger energy market is to make diverse renewable energy resources available to the load to ensure a reliable and economic grid - something from which we would all benefit. Section 6.2.2 contains several good ideas, as well as some that may warrant further discussion. Section 6.2.2.1 suggests supporting investments and planning for grid infrastructure upgrades to increase resilience and facilitate new energy options, an action that RNW strongly supports. We also firmly agree with the portion of section 6.2.2.2 that points out that OSW is a large capital investment and requires a long lead time, and that the Oregon Economic Development Strategy and Oregon Energy Strategy ought to be aligned to reflect this. This section also suggests that state procurement targets could be helpful or worth exploring, but does not make a recommendation; we agree with not recommending a procurement mandate at this time. We agree with recommendation 6.2.3.1 to continue to refine the Oregon Energy Strategy to potentially include offshore wind, when appropriate as market conditions change.

	Public option/ownership and public oversight structure.
1	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 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.
2	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.
3	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.
	Alternative Future Comparative Analysis
1	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 Scenarios ¹⁸), 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.

2	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. 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.
	Siting and Environmental Analysis
1	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 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.
2	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.
3	"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."

	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.
4	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, 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. 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.
5	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 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 articulate 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.
6	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.
7	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.
	Clarifying Port Role in Economic Participation Alternatives
1	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 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.
2	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."
3	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. These are capital-intensive, long-lead investments that typically require a seven to ten-year pipeline of demand to support a viable business case.
4	II. Oceanic Network’s West Coast Supplier Council Oceanic 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 Oceanic Network's broader supply chain programming, Oceanic can support Oregon interest parties in identifying practical solutions, highlighting gaps and opportunities, and fostering collaboration between public entities and private suppliers. Oceanic 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, Oceanic 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 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.
5	VI. Recommendations: Strengthening Investment Alignment in Roadmap Implementation Oceanic 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.
6	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
	Other comments to discuss as time allows
1	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. 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.
2	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.
3	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:

- | | |
|--|---|
| | <ul style="list-style-type: none">• 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 <p>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.</p> |
|--|---|