



Draft Report: A Proposed Offshore Wind Engagement Framework for Washington State

**Research and recommendations to shape planning and evaluation of
offshore wind off Washington's Pacific Coast.**

MAY 2024



GRIDWORKS

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SECTION 1: EXECUTIVE SUMMARY

Background

Washington State clean energy policies, including the Clean Energy Transformation Act and the Climate Commitment Act, among others, put the state on an aggressive path to pursue clean energy, and Washington is exploring many potential sources of renewable energy to achieve those goals.

In January of 2024, the Washington Department of Commerce, on behalf of the Office of Governor Inslee, hired Gridworks to complete a 5-month project to recommend a planning and evaluation process for potential offshore wind projects off the coast of Washington State.

The project is not intended to evaluate potential offshore wind development, but rather to recommend the design of a comprehensive and transparent process to do so and communicate this framework within a final report to the Governor's Office.

The Bureau of Ocean Energy Management (BOEM) is a federal agency responsible for oil, gas, and renewable energy development on the Outer Continental Shelf. BOEM is leasing offshore wind development off the West Coast as part of the Biden Administration's renewable energy targets, including 15 GW of floating offshore wind development by 2035.

Project Details

Project goals were to engage in research and targeted interviews with Washington stakeholders and Tribes to:

- Recommend a framework for a Washington-specific consultation and public engagement process to guide the planning and evaluation of potential offshore wind development off Washington's coast, including options for how BOEM and the state can tailor a BOEM process to Washington's unique needs and/or options to develop processes to augment BOEM's efforts.
- Identify key data gaps identified by state agencies, local governments, Tribes, and stakeholders pertinent to the planning and evaluation of offshore wind and recommended scientific studies needed to comprehensively evaluate potential offshore wind impacts.
- Identify funding needs to support the recommended framework.
- Recommend next steps to advance the planning and evaluation of offshore wind development off Washington's coast.

In January of 2024, Gridworks began review of publicly available information, interviews with participants in other state offshore wind planning and evaluation process, and the creation of a landscape review detailing other states' experiences with BOEM offshore wind processes. From January through May, Gridworks reached out to over 250 people and conducted more than 45 hours of interviews and engagement meetings to speak to Washington Tribal representatives, state agencies, local communities, local governments, and stakeholders representing recreational and commercial fishing, economic development, clean energy, conservation, maritime shipping, labor, port management, and more. Discussions centered around participants' past experiences with offshore wind planning and evaluation processes and opportunities to improve those processes to be more science-driven, transparent, and meaningfully engaging. Timing of this project challenged engagement with some participant groups, who also questioned the timing and duration of our efforts.

Findings regarding offshore wind planning and evaluation in other states.

States have approached offshore wind planning and evaluation differently. For the purposes of this report, Gridworks researched Oregon, Maine, California, and considerations unique to Washington:

- Oregon initially did not establish work groups or committees to consider BOEM's actions to lease Oregon offshore wind resources, though the future of offshore wind in the state was discussed in hypothetical, study-oriented contexts. Since BOEM launched activities in the state to identify areas to lease to offshore wind developers, the State of Oregon has taken a more active role in shaping discussions through development of an energy strategy and an offshore wind road map to inform development activities.
- Maine's Governor's Office took an active interest in developing offshore wind off the state coast, securing federal funding to create its own road map for offshore wind development in the Gulf of Maine. As a result of legislation, Maine also stood up a committee with working groups to pursue offshore wind development under a "best practices" approach, independent from BOEM's consideration of leasing off the state coast.
- California took a leadership approach to planning and evaluation of wind off of its coast through legislation designating the California Energy Commission as lead agency to coordinate state agencies as it developed offshore wind goals and a strategic plan for offshore wind development. California worked in partnership with BOEM to identify wind energy areas for leasing off the California coast.

States can provide leadership in offshore wind evaluation efforts with processes that at least run in parallel, if not start before, BOEM's initiation of its leasing process. BOEM's leasing efforts to-date are largely centered on the central question of determining lease areas. They are not structured to be the avenue in which states determine any values or priorities around offshore wind development, initiate new research, or definitively understand impacts to marine co-uses, communities, and Tribes. Rather, state actors engaging in a BOEM process brought their insights about state information or priorities to the BOEM process, either by informational presentations and discussion at advisory meetings or by submitting comments to the formal record of BOEM's decision-making efforts to establish lease areas.

While BOEM's advisory body, the intergovernmental task force, is a cornerstone of BOEM's process, it is not the sole public engagement vehicle for BOEM's process—particularly as the intergovernmental task force has historically been limited to government representatives and federally recognized Tribes.

Planning and evaluation considerations unique to Washington.

Washington's Coastal tribal treaties, existing marine conservation and co-use policies, and the lack of a definitive understanding of how/if offshore wind will contribute to Washington's energy goals provide unique considerations for any offshore wind planning and evaluation process off the Washington coast, whether state-led or BOEM-led. These topics require more research to understand how offshore wind energy can contribute to Washington's energy needs and regional grid decarbonization goals while ensuring healthy coastal communities, minimizing impacts to other marine co-uses like fishing, and protecting Tribal treaty rights.

Our interviews with Washington stakeholders and Tribes indicate Washington should consider:

- Preparing the state and stakeholders to play an active role a BOEM leasing process before entering the process in order to ensure federal leasing efforts are meaningful, transparent, and attuned to Washington's unique needs.
- Articulating why, how, or under what circumstances the state is considering offshore wind development off the state coast.
- Providing leadership on when and how environmental analysis and other research informs BOEM's planning and analysis processes for determining offshore wind leasing areas.
- Providing leadership on when and how potential conflicts with other ocean co-uses informs BOEM's planning and analysis process for determining offshore wind leasing areas.
- Shaping more transparent planning and analysis processes by ensuring information gathered from stakeholders and Tribes is used in decision-making efforts, or, if it isn't, communicating why it wasn't included.

- Shaping any process to plan for and evaluate offshore wind off the Washington Coast such that processes include opportunities for not moving forward with offshore wind if and when it becomes apparent that an offshore wind project is not appropriate for Washington.
- Supporting federal planning and analysis efforts through BOEM's advisory bodies and other public engagement to be more inclusive and engaging of Washington Tribes and stakeholders.
- Ensuring Tribal consultation early and often prior to and throughout any offshore wind planning and evaluation process.

Recommendations

Recommendation 1: Prior to entering a BOEM task force, Washington state should perform a thorough investigation and comprehensive catalog of Washington's legal authorities under CZMA enforceable policies and other jurisdictional authorities pertinent to potential siting and permitting of offshore wind. For example, the state should catalog its authority over transmission siting in state jurisdictional waters and lands and any other siting and permitting authorities likely relevant to offshore wind. The state should also examine whether the state wants to pursue a geographic location description designation to its CZMA enforceable policies to increase the state's ability to ensure enforceable policies are met. Undertaking this review will position the state to influence federal offshore wind leasing and development processes, from the start of a BOEM planning and analysis process through leasing, site assessments, and construction.

Recommendation 2: Washington state should consider development of or support for a regional research consortium that provides independent expert analysis and peer review of, guidance for, and prioritization of the research and analysis informing responsible offshore wind development off the Pacific Coast. Research to develop a baseline understanding of the California Current Large Marine Ecosystem and to then understand offshore wind impacts to Washington fisheries and other natural resources will be a complicated conversation that will likely draw on researchers and efforts from across the Pacific Coast, requiring substantial time and funding. The prioritization of studies to conduct research is outside of our scope and expertise, however we recommend Washington form or support the formation of an entity drawing on West Coast-wide research expertise to scope the additional studies Washington would need to effectively plan for and evaluate offshore wind impacts to the marine environment and coastal communities.

A preliminary list of research study needs identified by participants in our process for consideration include:

- | | | |
|--|--|--|
| • potential impacts to the California Current Large Marine Ecosystem | • forage effects | • social/socio-economic impacts to coastal Washington |
| • changes in upwelling | • seabird impacts, including blade collision | • fishing production (including stock surveys) |
| • changes to surface-level mixing | • endangered and protected species/habitat impacts | • impacts to other ocean co-uses |
| • changes to larval drift/ocean transport | • phytoplankton impacts | • impacts to the ecological value of natural resources |
| • impacts to stratification | • electromagnetic field effects | |
| • impacts to thermocline | • impacts to marine mammals and migration | |
| • wake effects of turbines | • acoustic noise impacts on ocean life | |

An initial list of organizations or entities to consider for inclusion on the consortium are Washington Department of Ecology, Washington Department of Fish and Wildlife, Oregon Department of Fish and Wildlife, the University of Washington and other Washington-based academic research groups, Oregon State University, Northwest Indian Fisheries Commission, Tribes, independent or nonprofit researchers and organizations, BOEM, National Labs, NOAA, NMFS, and DOD.

Recommendation 3: Washington state should take an active role in determining and articulating its policy priorities relative to offshore wind development off the state coast prior to a BOEM process. To determine the state's policy priorities, the state could take multiple routes (gubernatorial action, legislative action, or policy articulation developed through a working group). Given the early nature of offshore wind discussion in Washington state, Gridworks recommends state form a new offshore wind planning and analysis task force led by the State Dept. of Ecology that includes representation of Washington state agencies including Dept. of Natural Resources, Dept. of Fish and Wildlife, Dept. of Commerce, EFSEC, and the Utilities and Transportation Commission as well as Tribal governments, Tribal-led organizations, local governments, interested federal agencies such as the Dept. of Defense, and representatives of impacted groups including the fishing and maritime industries, labor, conservation, and other impacted viewpoints.

The work of the state planning and analysis task force would inform decisions by the governor, the Legislature, and decision-making state agencies like Ecology on the state's policy priorities regarding offshore wind development off the Washington Coast and enable the state to represent those priorities in a BOEM process and other offshore wind leasing or siting efforts.

Recommendation 4: Washington State should organize an offshore wind consultation leadership team including cabinet agency leadership from the Washington Dept. of Ecology, the Dept. of Commerce, and the Dept. of Fish and Wildlife to engage in on-going, iterative government-to-government consultations with the state government and governments of Washington's Coastal Tribes and other Tribes that may be impacted by offshore wind development. The consultations contemplated by this recommendation are expected to run parallel to the work of a state task force, allowing the results of government-to-government engagements to feed into and impact task force deliberations and outcomes. In the end, the purpose of these government-to-government engagements is to produce agreements on the protection and mutually beneficial stewardship of offshore lands and resources protected by Treaty rights, Executive Orders, and the state's legislative directives related to Tribes, the protection of cultural resources and practices, the creation of pathways for sharing information and costs to participate, the recognition of and respect for the rights of all sovereigns to assure the health, safety, and welfare of their citizens, and to streamline information exchange between the state and Tribes to inform any offshore renewable energy planning and evaluation efforts. This recommendation is separate from the pre-decisional government-to-government engagement we recommend BOEM undertake with Washington's Coastal Tribes and other Tribes that may be impacted by offshore wind development that is required through the U.S. federal government's trust responsibility to Tribes.

Recommendation 5: Washington State should develop a road map for responsible offshore wind development in order to encourage and elevate state priorities around responsible offshore wind development. Following the examples of Maine, California, and Oregon, roadmaps can articulate state priorities such as:

- realizing Washington economic development opportunities;
- additional data and research collection needed alongside or prior to project development;
- expectations for project community benefit agreements outlining assurances that local communities will benefit from offshore wind development;
- expectations for labor agreements outlining assurances that certain labor standards will be met during the life of the project; expectations for mitigation of various impacts; and

- outlines for the nature and impact thresholds of process off-ramps or exit ramps to inform whether the state or federal government should halt consideration of offshore wind projects, among other topics.

The road map could provide a set of guidelines, or it could act as an enforceable document, depending on the state's priorities. A road map effort could also develop additional work products, such as draft community benefit agreements or minimum requirements of what community benefit agreements should offer.

Recommendation 6: The state should develop advisory body requests for BOEM to meet in BOEM's consideration of offshore wind leasing off the Washington Coast, such as an intergovernmental task force or another body.

Recommendation 7: Washington State should develop specific guidelines, such as through an MOU or another agreement, to help guide BOEM's interaction with Tribes, stakeholders, and the public during a BOEM leasing process in Washington, both within and outside of an advisory body. Our intention in recommending the state pursue guidelines for BOEM to pursue would be to improve the BOEM process to be more meaningful, engaging, and transparent to Washington Tribes and stakeholder voices.

These recommendations, including options for pursuing them, tactical next steps and considerations, and capacity and funding needs, are provided in more detail in Section 4 of this report.

SECTION 2: INTRODUCTION AND BACKGROUND

Offshore wind resource on the West Coast. With projected generating capacity of 15 megawatts per turbine, offshore wind has the potential to serve regional and state efforts to transition off fossil fuels and meet growing demand for clean energy.¹ However, that potential doesn't come without costs that states like Washington should consider seriously, especially as federal agencies ramp up exploration of offshore wind development along the U.S. coastline.

The federal Bureau of Ocean Energy Management (BOEM) is exploring offshore wind potential along the West Coast as part of a federal interagency initiative to support deployment of 15 gigawatts of floating offshore wind by 2035 (building on the administration's existing goal of deploying 30 gigawatts of offshore wind by 2030, which will be likely be met using fixed-bottom technology):²

- **Oregon.** In 2022, BOEM initiated a Call for Information and Nominations (Call) for two areas (known as Call Areas) in Southern Oregon: Coos Bay and Brookings. These Call Areas have an estimated 14 gigawatts of generation potential.³ In early 2024, BOEM further narrowed this exploration to final Wind Energy Areas totaling 2.4 gigawatts of potential energy generation.⁴ BOEM is expected to hold a lease auction in late 2024.⁵
- **California North Coast.** BOEM held lease auctions in December 2022 for two Humboldt Bay Lease Areas near Eureka, approximately 60 miles south of the Oregon/California border.⁶ Combined, these areas were estimated by BOEM to accommodate 1.6 gigawatts.⁷ BOEM has stated that a second California leasing round is under development, and the Del Norte area in Northern California is expected to be included.
- **Washington.** BOEM received two unsolicited requests to explore offshore wind near Grays Harbor, totaling approximately 4 gigawatts of capacity.⁸ BOEM may eventually launch a task force with state officials and Tribal nations to explore future planning in Washington as it did in Oregon and California.

Controversy of offshore wind development and implications for Washington State. Even as offshore wind offers an important opportunity for firm, reliable, clean electricity generation potential, important questions regarding potential impacts of offshore wind remain unresolved, including potential impacts to treaty-reserved tribal rights, the marine ecosystem, commercial and recreational fishing, coastal communities, utility power costs, and more. In previous BOEM activities exploring offshore wind leasing areas along the U.S. coastline, Tribes and stakeholders have raised concerns regarding the transparency and inclusivity of BOEM's typical planning process for offshore wind.⁹

A BOEM planning process in Washington, if initiated, could follow the same steps as those in other states, starting with:

¹U.S. Department of Energy, [Offshore Wind Market Report](#); 2023 Edition, xiii.

² Fact Sheet: [Biden-Harris Administration Announces New Actions to Expand U.S. Offshore Wind Energy](#).

³ Call for Information and Nominations: [Commercial Leasing for Wind Energy Development on the Outer Continental Shelf \(OCS\) Offshore Oregon](#), Federal Register / Vol. 87, No. 83 / Friday, April 29, 2022 / Notices 25533, part 4.

⁴ [Oregon Area Identification Memorandum](#) February 2024, page 60.

⁵ The Renewable Energy Leasing Process: Timeline of Operations, [RE Leasing Process Poster v2.pdf \(boem.gov\)](#); <https://www.boem.gov/renewable-energy/lease-and-grant-information>

⁶ BOEM's California activities: <https://www.boem.gov/renewable-energy/state-activities/california>

⁷ [3799_CA Area ID Humboldt County Memo Final.pdf \(boem.gov\)](#), page 2.

⁸ <https://tridentwinds.com/wp-content/uploads/2022/04/ulr.pdf> page 1;

https://www.cascadiaoffshorewind.com/documents/Hecate_CascadiaWind_BOEM_ULR_20220729.pdf

⁹ Confederated Tribes Of Coos, Lower Umpqua & Siuslaw Indians, February 13, 2024, press release, "Tribe disappointed with wind energy decision citing failure of BOEM to honor its obligations to Tribe and impacts to fisheries, cultural resources, and heritage.

1. designation of a large planning area,
2. formation of an intergovernmental task force to review potential development areas, and
3. issuance of Call and Wind Energy areas within a designated footprint.

BOEM activities in both Oregon and California also included evaluation of early unsolicited requests, which helped to initiate larger BOEM processes.

Washington Offshore Wind Engagement Project background. To better understand the public engagement processes BOEM and states have used to assess feasibility of offshore wind leasing along U.S. coastlines and to understand whether or how those process might be improved for a Washington context, the Washington Governor's Office and Dept. of Commerce retained Gridworks in January 2024 to research best practices and lessons learned from other states and to engage with Washington Tribes and stakeholders to inform recommendations on the design of a Washington-specific process and framework for planning and evaluation of potential offshore wind development off the Washington coast. The state intends this process framework to be science-driven and transparent, including robust tribal consultation and incorporating stakeholder voices in future decision-making processes.¹⁰

This project is not intended to evaluate potential offshore wind development, but rather to recommend the design of a comprehensive and transparent process to guide offshore wind planning and engagement if offshore wind development moves forward. Gridworks' research, including input gathered from more than 40 hours of interviews and collaborative meetings with Washington Tribal representatives and stakeholders spanning interest areas like recreational and commercial fishing, local governance, economic development, clean energy, conservation, maritime shipping, labor, and port management, is presented in Section 3 of this report. These interviews with Washington perspectives, as well as our research and interviews with individuals from other jurisdictions, form the basis of our recommendations outlined in detail in Section 4.

Research methodology.

Lessons learned from other states. Gridworks' review of the BOEM process in other states relies on review of public BOEM process materials, review of federal documents guiding BOEM processes, interviews with participants from impacted stakeholders and communities in those processes, and conversations with BOEM staff conducted in January and February 2024. We present case studies on stakeholder experiences of these processes in Oregon, Maine, and California, and stakeholder observations of BOEM and state engagement with Tribal nations in Appendix B of this report. These stakeholder experiences are drawn from direct interviews with a small cross section of state agency representatives and process participants that took place between January and February 2024, as well as public documents reviewed during the same time period. Our timeline did not allow for and Gridworks did not attempt to engage with all state agency representatives in a process; instead, we prioritized our available time for interviewing participants in offshore wind processes. We offer these perspectives as a snapshot of offshore wind processes in other states rather than a definitive account.

Due to the timing of this research coinciding with the announcement of final Wind Energy Areas in Oregon, our engagement with Tribes and some stakeholders in Oregon to understand their experiences with the BOEM process was inhibited; where we couldn't directly reach individuals, we relied on public announcements shared by Tribes and stakeholders about their experience of the BOEM process.¹¹

Through our research into other jurisdictions, we explored:

- What public engagement practices in other states were successful, and why?
- Did Tribes and interested parties consider those processes transparent? What were their expectations for a transparent process?
- Were engagement practices co-developed with or communicated to Tribes and the public early, in pre-decisional phases of an engagement process?

¹⁰ <https://www.commerce.wa.gov/contracting-with-commerce/recommending-a-planning-and-evaluation-process-for-offshore-wind-projects-request-for-proposals/>

¹¹ Native News Online. "[Simply Green Colonialism: Feds Move Forward with Oregon Offshore Wind Project Despite Tribal Objections](#)"

- What role did technical information and engagement support play in helping Tribes, stakeholders, and the public understand strengths and challenges of offshore wind as a potential energy resource?
- What trusted organizations or entities within the state and federal governments and the academic, nonprofit, or private sector supplied that support?
- What takeaways from these processes can inform any future interactions between Washington state and BOEM regarding offshore wind?

Interviews and collaborative meetings with Washington Tribes and stakeholders. Following identification of Tribes and stakeholder voices to include in our research—conducted in collaboration with the state team staffing the Washington State Offshore Wind Engagement Project—Gridworks invited and convened 28 interview conversations with identified Tribes and stakeholders both individually and in small groups (typically 5-15 individuals per group) between February 23 and May 24. Invitations were sent to an expansive list of potentially impacted Tribes and stakeholders: coastal Tribes and inland Tribes expressing interest in engaging with us during early project Tribal briefings; coastal local governments; coastal ports; coastal economic development and tourism organizations; commercial and recreational fishing and fish processing representatives; labor representatives; coastal and Washington-based conservation organizations; coastal and Washington-based oceanographic research institutions; maritime industry representatives; clean energy representatives; and offshore wind developers. The research team welcomed additional contacts identified by participants in our process. Meetings were scheduled based on participant availability and willingness to engage in our process. The length of meetings varied depending on participant availability and number of attendees in a call or in-person meeting, but generally ranged between 1 and 3 hours per meeting in order to include a period of orientation to the discussion and time for conversation.

The goal of these conversations was to uncover best practices and procedures Washington should consider in evaluating offshore wind, including gaps in existing data necessary to support an inclusive and participatory offshore wind evaluation process. The outreach meetings gathered insight and input from participants across a number of topics related to offshore wind development processes. Meeting participants were invited to continue to engage with the project and future discussions, including public comment meetings scheduled prior to report finalization.

Gridworks provided summaries or notes from meetings to participating contacts following each meeting and incorporated additional feedback on that summary or notes document from participants to ensure transparency and mutual understanding of conversations. Gridworks also provided participants the opportunity to give us feedback on our meetings and whether they felt heard and understood through post-meeting feedback surveys.

Through this report and associated research documentation, Gridworks does not attribute perspectives shared to individual participants in order to protect the identity of participants and encourage open communication. An unattributed summary matrix of our discussions, which is broken out by industry group, can be found in Appendix C of this report, and identifies:

- participants' motivating values and principals and specific elements requested for participatory framework,
- important key points,
- consensus elements,
- areas of divergence, and
- a list of data gaps, research studies, and funding or support needs proposed by participants.

Gridworks also cross references recommendations in Section 4 with the summary matrix to demonstrate where Tribal and stakeholder input was reflected in our report and recommendation development.

Challenges facing the WA Offshore Wind Engagement Project. Through initial engagement with stakeholders, Tribes, and tribal-led organizations at project launch, Gridworks heard a number of concerns that the project timeline would be difficult for Tribes and fishing communities to work with, particularly given the coincident start of fishing seasons along the Washington Coast. Additionally, through our engagement, we heard some skepticism that the project timeline allowed enough time for thoughtful discussion, analysis, and subsequent formation of recommendations.

Report authors appreciate the timing challenges of this project and recognize that providing sufficient time for participants to engage in a process is a cornerstone of a transparent, inclusive public engagement effort. We offer the research and recommendations outlined in this report as one piece of an on-going and longer-term conversation in Washington State to examine the potential opportunities, costs, and challenges offshore wind may present as a potential clean energy resource.

Evolving state policy and process context in planning for and evaluating offshore wind, including “roadmaps.”

As this project unfolded, our discussions uncovered a continued evolution in offshore wind policy among Pacific Coast states, which have differing priorities relative to offshore wind development. While California is actively pursuing the resource to meet state energy goals, Oregon took a different policy approach that initially focused on identifying the benefits and challenges of integrating up to 3 gigawatts of floating offshore wind by 2030 but with no mandate for any particular development goal. Oregon continues to study the opportunities and challenges offshore wind may present as part of its recently launched Energy Strategy effort and as Oregon offshore wind stakeholders develop their suggestions for considering offshore wind.¹²

Even as BOEM's leasing efforts move forward in California and Oregon, their state legislatures continue to propose or enact new legislation guiding offshore wind development and consideration. These policy ideas are often drafted in an effort to address issues and concerns raised by impacted communities and interests in an effort to create more inclusive, transparent, and science-based processes. For example:

- California [Assembly Bill 80](#) (introduced in December 2022 and suspended on August 15, 2023) would have required California's Ocean Protection Council to establish and oversee a nonprofit West Coast Offshore Wind Science Entity to research and identify a comprehensive baseline for and ongoing monitoring of the California Current Large Marine Ecosystem. This bill would also require the entity to conduct targeted research and ensure that research is available and used to inform state and federal decisions. The bill would also call on this entity to coordinate with other state and federal entities.
- California [Senate Bill 286](#), (signed into law and effective October 7, 2023) requires the California Coastal Commission, in coordination with the Department of Fish and Wildlife, to convene a working group by 2025 to develop a statewide strategy for ensuring that offshore wind energy projects avoid and minimize impacts to ocean fisheries to the maximum extent possible, avoid, minimize, and mitigate impacts to fishing and fisheries in a manner that prioritizes fishery productivity, viability, and long-term resilience, and fairly and reasonably compensate persons engaged in the commercial and recreational fishing industries and tribal fisheries for economic impacts to ocean fisheries resulting from offshore wind energy projects, among other topics.
- Oregon [House Bill 4080](#) (signed into law and effective March 27, 2024) clarifies Oregon's state policy as supportive of engagement between offshore wind developers and impacted interests and communities and instructs the Oregon Department of Energy (ODOE) to make a road map for standards for developing offshore wind energy. This road map will support engagement between offshore wind developers and impacted organizations, communities, and tribes. This bill also requires developers and contractors involved in the development of offshore wind to uphold certain labor and supply chain standards. Finally, this bill requires the Oregon Department of Land Conservation and Development to conduct or support consistency reviews of offshore wind leasing decisions and related actions involving state priorities outlined under federal Coastal Zone Management Act provisions.

¹² Oregon [House Bill 3630](#) (signed into law and effective in 2023) directed ODOE to develop a State Energy Strategy. The process has begun, and a final written report to the Governor and Legislature is due by November 1, 2025. The Oregon Energy Strategy will serve as a resource to identify and help stimulate investments in energy resources such as offshore wind and associated infrastructure that are needed to keep Oregon on track to meet its clean energy and greenhouse gas emission reduction targets between now and 2050. See also Informal Offshore Wind Work Group. 2024. Oregon Floating Offshore Wind Energy Roadmap with Exit Ramps: Considerations. <https://oregonconsensus.org/projects/oregon-offshore-wind-work-group/>

In response to this bill's provisions for developing a road map, a diverse group of Oregon stakeholders, including clean energy advocates, labor advocates, the fishing community, and more, co-authored recommendations to the Oregon Governor's Office for conducting a road map development process and the associated provisions they'd like to see in such a road map. This informal consensus-building exercise among state agency representatives and diverse Oregon stakeholders with divergent interests around offshore wind took place over 9 months and was published in April 2024.¹³

On-going legislative action in California and Oregon indicates that as planning and evaluation for offshore wind development begins, states find it necessary to direct planners, researchers, and developers for offshore wind to conduct their work in line with state values and goals for clean energy development, economic development, marine resource protection, and Tribal and coastal community involvement in offshore wind development, among other topics.

To-date, Washington has not directly stated policy priorities through state legislative, executive, or administrative action that our research could find, with the exception of the Washington State Energy Strategy that indicates offshore wind may be an economically viable resource for the state to consider in the 2040s, an initiative to contribute to overall supply chain efforts for the offshore wind industry at large, and the initiation of this report.

Washington's 2024 legislative action regarding offshore wind was largely limited to Washington [House Bill 2341](#) (introduced on January 12 2024, not passed out of committee), which would have directed the University of Washington to conduct a study on the cumulative effects, both negative and positive, of offshore wind development on the oceanographic processes of the Pacific Ocean, including processes like waves, tides, currents, and upwelling as well as how changes to these processes might impact the broader marine ecosystem.

This bill did not pass in the 2024 legislative session. However, budget provisions in the [2024 supplemental operating budget](#) support offshore wind supply chain development and effective ocean policy management discussions in Washington, including:

- Increased planning, engagement, and evaluation tool development for effective ocean management, including possible offshore wind energy development,
- A study to assess strategy for Washington's engagement in the offshore wind supply chain, including but not limited to public infrastructure needed for manufacturing, assembly, and transport of supply chain components, workforce needs, and community benefits, and
- A coalition to identify economic, community, and workforce development opportunities resulting from Washington state's participation in the offshore wind supply chain through conducting convenings, workshops, and studies as appropriate.

As our case studies by state in Appendix B indicate, participants in offshore wind planning and evaluation processes may find those processes to be more or less successful (transparent, meaningful, science-driven, and engaging) depending on the role the state plays in guiding offshore wind planning and evaluation through legislative action, gubernatorial guidance, or policy development at the state agency level—something for Washington State to consider as it considers its own processes around offshore wind development.

¹³Informal Offshore Wind Work Group. 2024. Oregon Floating Offshore Wind Energy Roadmap with Exit Ramps: Considerations. <https://oregonconsensus.org/projects/oregon-offshore-wind-work-group/>

SECTION 3: RESEARCH FINDINGS

U.S. Bureau of Ocean Energy Management (BOEM)

As an agency within the U.S. Department of the Interior, BOEM was founded in 2011, splitting from the Bureau of Ocean Energy Management, Regulation, and Enforcement (BOEMRE).¹⁴ BOEM is responsible for managing the development of offshore renewable energy and natural gas, oil, and other mineral resources in federal waters, which includes those waters along the outer continental shelf (i.e., waters situated between three nautical and 200 nautical miles from shore). BOEM approves leasing, site assessments, and construction and operations plans for offshore renewable energy projects. BOEM hands oversight of energy development projects to the federal Bureau of Safety and Environmental Enforcement (BSEE) at the beginning of a project's construction phase.

In general, BOEM's timelines and processes to consider and plan for leasing federal waters to offshore wind developers have evolved from state to state. Figure 1 below provides a generic timeline showing the main, overarching components of BOEM's process.

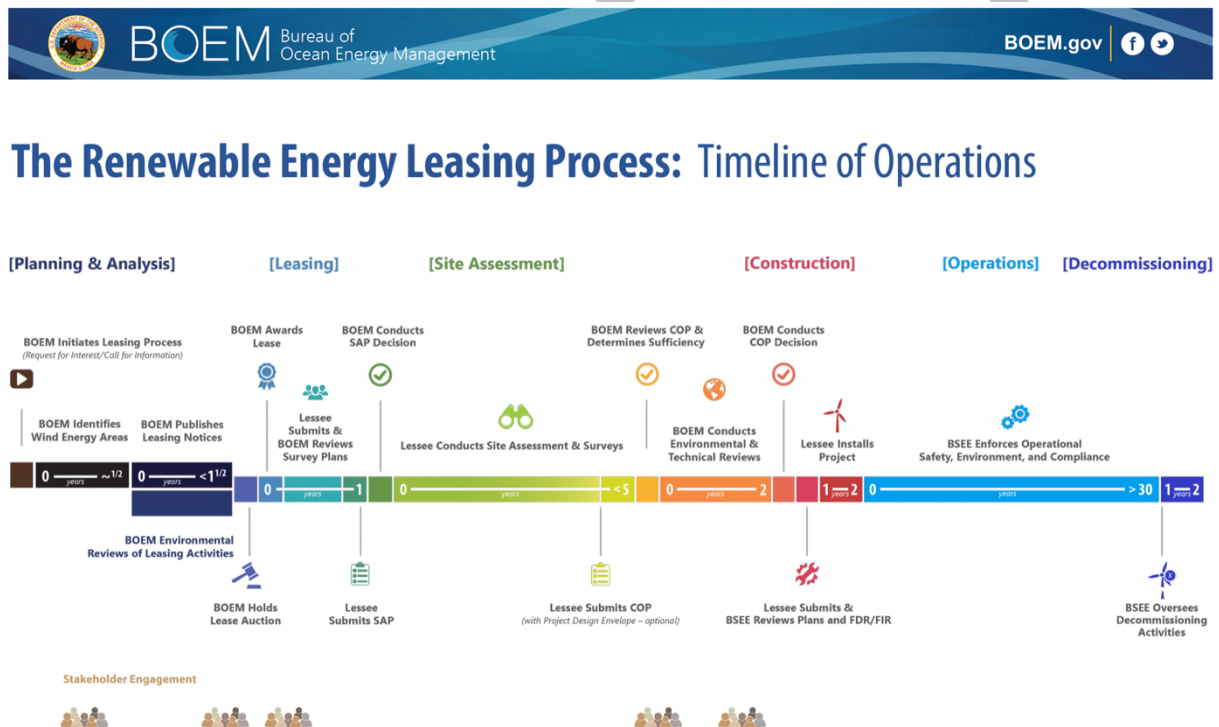


Figure 1: General BOEM timeline for its offshore wind activities, pulled from [CA leasing process materials](#).

BOEM's process for offshore wind leasing follows six phases containing three environmental assessments, beginning with planning and analysis and culminating in BOEM approval of the developer's Construction and Operational Plan after which oversight is passed to the Bureau of Safety and Environmental Enforcement (BSEE). BOEM's generic planning and analysis phase timeline for

¹⁴ BOEMRE, formerly known as Mineral Management Service, contained BOEM, the Bureau of Safety and Environmental Enforcement (BSEE), and the Office of Natural Resources Revenue (ONRR).

offshore energy projects is approximately 2-years long, but can and has historically started and paused or slowed to extend over a longer time period.¹⁵

Once, the planning and analysis phase establishes “Wind Energy Areas” or WEAs (areas in which BOEM may issue offshore wind leases), lease auctions are conducted and project developer lessees submit and conduct BOEM-approved site assessment plans that begin to identify the offshore wind technology to be used in projects, such as wind tower anchoring systems and spatial configuration of towers and cable routes. BOEM conducts an environmental assessment of the WEA under its NEPA requirements using best available science before issuing lease offers and subsequently conducting another environmental assessment of the site assessment plans. After site environmental assessment is completed, the lessee submits a construction and operational plan on which BOEM performs another environmental review.

In conducting its planning and analysis efforts to identify Wind Energy Areas and in its leasing processes, BOEM is required to provide for, among other things, consideration of safety, protection of the environment, prevention of waste, and conservation of the natural resources of the outer continental shelf.¹⁶ In its review, BOEM must coordinate with relevant federal agencies, including agencies tasked with managing marine uses and agencies tasked with maximizing economic and ecological benefits of the outer continental shelf, including marine spatial planning.¹⁷

BOEM is also required to “provide for coordination and consultation with the Governor of any state or the executive of any local government and Tribal government that may be affected by leasing, easement, or right-of-way” for offshore wind.¹⁸ BOEM must provide public notice and comment on any proposal submitted for a lease or grant.¹⁹

Intergovernmental Renewable Energy Task Force and the Federal Advisory Committee Act

Activities of an intergovernmental task force. As one part of its engagement processes for determining Wind Energy Areas, BOEM has utilized the federal/state Intergovernmental Renewable Energy Task Force (task force) to assist its coordination and consultation with state and local governments and Tribes. A BOEM task force is not a decision-making body, nor do task forces make recommendations to BOEM as a body. Instead, individuals on the task force assist BOEM’s decision-making by exchanging views, information, or advice relating to BOEM’s management of federal waters for offshore wind proposals.

The task force serves as a forum to:

- Coordinate planning to identify the most appropriate sites for renewable energy leasing and development activities,
- Provide education about BOEM’s processes and permitting and statutory requirements as early in the planning process as possible,
- Exchange information about biological and physical resources, ocean uses, and priorities, and
- Discuss BOEM’s renewable energy activities throughout the four phases of its process: planning, leasing, site assessment, and construction and operations.

BOEM’s intergovernmental task force is a formal public process *component* of BOEM’s overall engagement efforts around offshore wind planning, evaluation, and leasing. The task force is limited to governmental participants and federally recognized Tribes and does not operate BOEM’s broader public engagement processes, nor does it typically serve as a state forum for public engagement in considering offshore wind development. As such, the task force does not function as the center of

¹⁵ For example see history of timelines at <https://www.boem.gov/renewable-energy/state-activities/maine/gulf-maine>.

¹⁶ 30 DFR 585.102(a)(1)-(5), [eCFR :: 30 CFR 585.102 -- What are BOEM's responsibilities under this part?](#)

¹⁷ 30 DFR 585.102, [eCFR :: 30 CFR 585.102 -- What are BOEM's responsibilities under this part?](#)

¹⁸ Subsection 8(p)(7) of the Outer Continental Shelf Lands Act, as amended by the Energy Policy Act of 2005 (EP Act).

¹⁹ 30 DFR 585.102(a)(11).

BOEM's stakeholder or public engagement efforts and should not be considered as central to a BOEM public or stakeholder engagement plan for considering offshore wind leasing.

BOEM typically uses intergovernmental task force meetings to provide updates on its leasing process rather than as a forum to present new information or presentations on new announcements on agency actions. Task force members use the task force to present updates on information and studies regarding offshore wind leasing specific to their expertise or jurisdictional authority, provide updates on new or proposed legislation, and provide updates regarding deliberations of expert committees. Task force members have used task force discussions to raise specific questions about data used to evaluate offshore wind leasing efforts, BOEM's analysis methods, and to comment on specific changes BOEM has made or not made to the area under consideration for leasing. Members have also used the space to provide BOEM suggestions on additional changes and data BOEM should seek and further consider.

Federal Advisory Committee Act provisions guiding task forces and federal advisory bodies. To date, BOEM's use of intergovernmental task forces has limited the advisory body to consist exclusively of governmental bodies and federally recognized Tribes, which exempts BOEM from certain provisions of the Federal Advisory Committee Act (FACA).

FACA was established to ensure that advice to the federal executive branch and federal agencies by various advisory committees is objective and accessible to the public. FACA formalizes federal agency processes for establishing, operating, overseeing, and terminating these advisory bodies. FACA also identifies specific committees or groups that are exempt from FACA provisions and not subject to FACA rules. These exemptions include "intergovernmental committees," as long as the committee is limited to governmental entities and federally recognized Tribes and as long as the committee's defined purpose is solely to exchange views, information, or advice.²⁰

The rules governing BOEM's intergovernmental task force places no restrictions on the minimum or maximum number of task force members,²¹ and do not specify selection processes for identifying and convening task force members. To-date and in the states we researched, BOEM's task forces have included federal, Tribal, state, county, and city governments and elected governing bodies such as port and public utility districts. These task forces have not included non-federally recognized Tribes or non-governmental organizations, such as members of conservation groups or non-governmental representatives of a maritime or fishing industry.

Other types of FACA-exempted committees or groups include "groups established to advise State or local officials."²² This exemption could include groups specifically set up by a state to assist a state in its evaluation of offshore wind proposals *without* the membership limitations placed on intergovernmental committees. For example, this type of group may be able to include stakeholder voices such as fishing or maritime or conservation voices at the advisory body table.

²⁰ [eCFR :: 41 CFR 102-3.40 -- What types of committees or groups are not covered by the Act and this part? \(FMR 102-3.40\)](#) "Intergovernmental committees. Any committee composed wholly of full-time or permanent part-time officers or employees of the Federal Government and elected officers of State, local and tribal governments (or their designated employees with authority to act on their behalf), acting in their official capacities. However, the purpose of such a committee must be solely to exchange views, information, or advice relating to the management or implementation of Federal programs established pursuant to statute, that explicitly or inherently share intergovernmental responsibilities or administration (see guidelines issued by the Office of Management and Budget (OMB) on section 204(b) of the Unfunded Mandates Reform Act of 1995, [2 U.S.C. 1534\(b\)](#), OMB Memorandum M-95-20, dated September 21, 1995, available from the Committee Management Secretariat (MC), General Services Administration, 1800 F Street, NW., Washington, DC 20405-0002)."

²¹ The BOEM/Oregon task force has 47 members, the BOEM Gulf of Maine task force has 194 members, and the BOEM/California task force has 64 members.

²² Defined as "any State or local committee, council, board, commission, or similar group established to advise or make recommendations to State or local officials or agencies, [https://www.ecfr.gov/current/title-41/part-102-3/section-102-3.40#p-102-3.40\(j\)](https://www.ecfr.gov/current/title-41/part-102-3/section-102-3.40#p-102-3.40(j))."

For BOEM to develop an advisory body under its management that includes non-governmental groups or individuals would likely require more rigorous considerations and compliance with FACA policies and rules.²³ FACA emphasizes public involvement through open meetings and reporting, requires advanced public notice of meetings, and requires that all materials be publicly available to both the public and committee members. FACA rules also require committees to be terminated after two years, unless the sponsor agency renews the committee's charter prior to the two-year expiration date. Further, FACA requires agencies to terminate a committee once it has completed its function.

State involvement in forming a task force and other public engagement efforts. Task forces typically operate under a charter outlining their purpose, membership, role and responsibilities, and charge to the group. Historically, BOEM considers input from federal, state, local, and Tribal entities when forming its intergovernmental task force to define an appropriate role for that task force.²⁴ BOEM's discussions with states include the identification of key upcoming discussion and decision points and a determination of timing and frequency of in-person task force meetings, virtual meetings, and other forums for engagement. According to BOEM, these discussions with states determine a customized approach to offshore wind leasing task forces in each state as well as "customized stakeholder outreach and engagement plans to foster active engagement."²⁵

BOEM's task forces typically have not accepted public comments or questions during meetings, though the public is able to attend meetings to watch and listen.²⁶ Presentations to task forces must be conducted by governmental or Tribal personnel, not by non-governmental stakeholders. Historically, BOEM has closed its task force meetings and immediately followed them with facilitated and recorded oral public comment opportunities, during which each member of the public is usually provided a 3-minute time limit.²⁷ Frequently BOEM has made video recordings of public comments available.²⁸ This is all typically at BOEM's discretion as there is no requirement limiting a public speaker's time nor a requirement for BOEM to take oral public comments.

Outside of the task force, BOEM also solicits public input through public comment meetings that have included informational tables and periods for stakeholders to submit formal written public comments or informal oral comments. BOEM has conducted public meetings in coastal communities as well as small "one-on-one" meetings with varied stakeholders and Tribes.²⁹ BOEM has presented and discussed its offshore wind considerations at standing committees such as Oregon Port of Orford Commissions, Oregon Trawling Commission, and Columbia River Steamship Operators' Association³⁰ and conducted subject-specific public meetings such as a mobile gear meeting in Maine with Groundfish fisheries.³¹

BOEM is not required to respond to or summarize in writing public comments received outside of its official comment solicitations. However, BOEM has committed, "when needed," to provide documentation that explains its decision-making processes and rationale for decisions related to offshore wind energy development.³²

Other BOEM advisory body structures and participation in state public engagement processes

²³ Establishment of Advisory Committees, <https://www.ecfr.gov/current/title-41/part-105-54/subpart-105-54.2>.

²⁴ Strengthening the intergovernmental renewable Energy Task Forces, February 2018, Page 7.

²⁵ Strengthening the intergovernmental renewable Energy Task Forces, February 2018, Page 8.

²⁶ While this has been a general practice of the BOEM task force, we have not made an analysis of the legal restriction prohibiting the task force from taking public comment.

²⁷ Examples include BOEM/Oregon Renewable Energy Task Force meetings September 18, 2023, February 25, 2022.

²⁸ Examples include BOEM/Oregon Renewable Energy Task Force meetings September 18, 2023, February 25, 2022.

²⁹ Data Gathering and Engagement Summary Report, Oregon Offshore Wind Energy Planning, January 2022, page 14.

³⁰ Data Gathering and Engagement Summary Report, Oregon Offshore Wind Energy Planning, January 2022, page 20-21.

³¹ For more examples of topic specific meetings in Maine see: <https://www.boem.gov/renewable-energy/state-activities/gulf-maine-draft-wind-energy-area-public-meetings>

³² Strengthening the intergovernmental renewable Energy Task Forces, February 2018, Page 9.

Based on Gridworks' research conducted to-date, BOEM has not created other formal committees or work groups outside of an intergovernmental task force in determining Wind Energy Areas and issuing leases to offshore wind developers. On the other hand, states have created state-led working groups for consideration of offshore wind issues, and while BOEM has attended those committees and working groups, it has not typically been a sitting member of state-established groups.³³

That said, BOEM may have statutory discretion to participate in state committees or work groups as a sitting member: BOEM staff have engaged in state-led processes as attendees during the same time period that BOEM has conducted its own process for determining wind energy areas and issuing leases. Additionally, federal law includes provisions for BOEM to participate in "other joint planning or coordination agreements."³⁴ However, only information provided through a BOEM-led process becomes part of BOEM's official record for its leasing activities, and BOEM does not typically respond in writing to public input gathered in informal public meeting settings outside of its official comment process.

BOEM Tribal Engagement

The authority directing BOEM's engagement with Tribes is spread among several statutes, Executive Orders, and Department of Interior policies, manuals, and secretarial orders.³⁵ The collection of documents can make it difficult for the public and states to understand in practice what obligations BOEM has for consultation with the Tribes and what triggers those obligations.

Generally, the documents contain qualitative procedural requirements. The statutes do not contain, and BOEM's guidance does not specify, quantitative requirements for dates, timelines, numbers of meetings or opportunities for comment, or other quantifiable procedures BOEM must conduct to fulfill its obligations to consult with Tribes.

In short, BOEM is required to conduct government-to-government consultation with Tribal officials if a BOEM action has tribal implications.³⁶ BOEM is also required to identify Tribal consultation parties "early in the planning process" and provide "meaningful opportunity to participate in the consultation process."³⁷ BOEM is required to participate "in the consultation process in a manner that demonstrates a meaningful commitment."³⁸ BOEM consultation is intended "to create effective collaboration and informed Federal decision-making."³⁹ Among other duties, the BOEM Tribal Liaison Officer will provide

³³ See Oregon Floating Offshore Wind Study [public meetings attendance lists; Maine OSW road map advisory and steering groups](#), (page 18-19) and public meeting attendance lists; and [Maine Consortium steering and advisory committees](#) and meeting attendee lists. [Central California Offshore Working Group Outreach Summary Report Addendum California Offshore Wind Energy Planning Updated June 2021](#), (page 2-3).

³⁴ BOEM will provide for coordination and consultation with the Governor of any State, the executive of any local government, and the executive of any Indian Tribe that may be affected by a lease, easement, or ROW under this subsection. BOEM may invite any affected State Governor, representative of an affected Indian Tribe, and affected local government executive to join in establishing a task force or other joint planning or coordination agreement in carrying out our responsibilities under this part. [https://www.ecfr.gov/current/title-30/part-585/section-585.102#p-585.102\(e\)](https://www.ecfr.gov/current/title-30/part-585/section-585.102#p-585.102(e))

³⁵ [Tribal Engagement | Bureau of Ocean Energy Management \(boem.gov\)](#) For the most accessible explanation of the requirements for BOEM designating officials to perform the role of tribal consultation see United States Department of Interior, memorandum on BOEM Tribal Consultation Guidance, June 29, 2018, [BOEM Tribal Consultation Guidance with Memo](#).

³⁶ For the most accessible explanation of the requirements for BOEM designating officials to perform the role of Tribal consultation see United States Department of Interior, [memorandum on BOEM Tribal Consultation Guidance](#), June 29, 2018, page 3.

³⁷ United States Department of Interior, memorandum on BOEM Tribal Consultation Guidance, June 29, 2018, page

³⁸ U.S. Department of Interior, BOEM Tribal Consultation Guidance, June 29, 2018, page 3.

³⁹ U.S. Department of Interior, BOEM Tribal Consultation Guidance, June 29, 2018, page 3.

“follow up” on consultations.⁴⁰ As a federal agency, BOEM is required to report annually on Tribal consultations, including documenting outcomes and Tribal input.⁴¹

In considering its obligation to initiate government-to-government consultation with Tribal officials, BOEM has referenced whether its actions constitute actions that may have substantial direct effects on one or more Tribes.

Tribal consultations are not limited or restricted by the Federal Advisory Committee Act rules.

Participant capacity funding and support to engage in BOEM's offshore wind processes

BOEM does not currently have budget authorization to provide participant funding for its processes, neither in the task force nor other public engagement efforts outlined in its public engagement plans for individual states. Gridworks' research to-date has not identified federal sources of funding available to stakeholders to support their participation in BOEM offshore wind processes. Without the use of participant funding, BOEM has mitigated burdens to stakeholders participating in its processes by locating its public meetings in locally impacted communities, by providing remote attendance opportunities, and by improving its efforts to schedule some public or stakeholder meetings on days and at times that minimize lost work hours among impacted industries and stakeholders.

It is unclear if federal grant monies available to Tribes for activities in the clean energy space can be used to support Tribal participation in either BOEM's or a state's consideration of offshore wind.

That said, the state of Maine did use federal grant money to design its own road map and process for its consideration of offshore wind development.⁴² It is uncertain if future federal grants, to the extent they exist, will provide for funds to be used for participant funding or even available for state-led consideration of offshore wind, such as the Main roadmap process.

BOEM's offshore wind planning and evaluation research to determine lease sites and additional study funding

Through BOEM's planning and analysis phase of its leasing process, BOEM conducts its own internal modeling to assist it in determining wind energy and leasing areas. BOEM has capacity to examine studies conducted by other governmental agencies and public and private organizations,⁴³ however BOEM is only required to use best available information for its determination of offshore wind leasing.

BOEM typically starts its efforts to plan for and evaluate offshore wind leasing areas by identifying a Call Area that generally includes the areas developers have expressed interest in. BOEM then begins to narrow the Call Area to a potential Wind Energy Area by excluding areas with conflicts such as:

- shipping lane areas identified by the U.S Coast Guard,
- areas used by the Department of Defense, or
- marine habitat areas as suggested by the National Marine Fisheries Sciences, such as humpback whale critical habitat areas, areas designated as yellow rockfish conservation areas, and critical areas for leatherback turtles.⁴⁴

This process is iterative as BOEM seeks input from both a task force and from a broader group of stakeholders through additional engagement with stakeholders.

In the past, BOEM has teamed with other agencies to perform studies of floating offshore wind's effects on upwelling as well as other marine topics.⁴⁵ However, BOEM's funding for additional studies of offshore wind's effects on the marine environment is limited.

⁴⁰ U.S. Department of Interior, BOEM Tribal Consultation Guidance, June 29, 2018, page 6.

⁴¹ BOEM. [FY 2022 Tribal Consultation Report](#). Date Prepared: December 28, 2022

⁴² Maine secured a \$2.166 million grant from the U.S. Economic Development Administration in 2020. [Maine Offshore Wind Roadmap February 2023.pdf](#), page 6.

⁴³ BOEM used its Wind Energy Area siting suitability model to determine the final areas in Oregon; [A Wind Energy Area Siting Analysis for the Oregon Call Areas](#), page 2, [Appendix B NCCOS Final Report](#).

⁴⁴ BOEM Oregon Intergovernmental renewable Energy 2022 Task Force Q&A Session, 02/25/2022, 10:45-11:45 at 45 seconds

⁴⁵ [Selected BOEM-Funded Research Informing Renewable Energy Offshore California](#), August 2023; [Selected BOEM-Funded Research Informing Renewable Energy Offshore Oregon](#), August 2023

This additional work to understand impacts of offshore wind's effects on the marine environment is not conducted as a required part of BOEM's wind energy area or leasing determinations, as BOEM is only required to use best available information in its leasing process.

BOEM's review of and measures of success for public processes and Tribal consultation

In 2017, BOEM hired Consensus Building Institute to evaluate BOEM's task force process.⁴⁶ The study interviewed task force members and representatives of offshore lease holders from 14 coastal states with task force experience. One of the study's recommendations was to "enhance stakeholder engagement by building on and expanding the task force approach."⁴⁷ To enact this recommendation, BOEM committed to "work with each of its state partners to develop and implement customized stakeholder outreach and engagement plans to foster active engagement."⁴⁸ On issues of substantive decision-making, the study recommended BOEM, "provide documentation that explains the decision-making process and rationale for [its] decisions" related to offshore wind energy development.⁴⁹ The report provided detailed recommendations for strengthening task force dialogue, including:⁵⁰

Pre-task force meetings:

- Announce meetings and provide meeting materials well in advance
- Collaborate with state partners to tailor and vary meeting content and format
- Keep current and make public task force member lists
- Ensure agency's website is up-to-date with relevant materials and discussion summaries

At task force meetings:

- Foster more frequent and consistent contact with task forces using diverse formats (in-person, webinar, email updates)
- Design meetings to enhance participant engagement and meeting effectiveness
- Make public comments more integral to meeting
- Provide ongoing updates on previously raised issues

Post-task force meetings:

- Make meeting summaries available online
- Create succinct "meeting in brief" documents
- Distribute updates via email and social media
- Respond to frequently asked questions

As noted throughout this section, BOEM has flexibility to tailor processes to state needs, and the experiences of stakeholders in BOEM's engagement processes have varied from state to state. A common thread among participant experiences has been the extent to which a state has guided or helped to shape BOEM's processes to meet stakeholder needs.

See Appendix B: Process Case Studies from Oregon, Maine, and California for more information on state-specific offshore wind planning and analysis efforts, including both federal- and state-led processes.

⁴⁶ [Strengthening-the-Task-Forces-Final-4.2-\(1\).pdf \(boem.gov\)](#). The report included an evaluation of the task force established at the time.

⁴⁷ [Strengthening-the-Task-Forces-Final-4.2-\(1\).pdf \(boem.gov\)](#), page 4.

⁴⁸ [Strengthening-the-Task-Forces-Final-4.2-\(1\).pdf \(boem.gov\)](#), page 4.

⁴⁹ [Strengthening-the-Task-Forces-Final-4.2-\(1\).pdf \(boem.gov\)](#), page 9.

⁵⁰ [Strengthening-the-Task-Forces-Final-4.2-\(1\).pdf \(boem.gov\)](#), page 5.

Considerations Unique to Washington

Tribal Sovereignty and Treaty Rights

Treaty of 1855. Tribes in Washington who would be most immediately impacted by offshore wind development are located on or near Washington's Pacific coastline. Of these coastal tribes, Makah Tribe, Hoh Tribe, Quileute Tribe, and the Quinault Indian Nation are signatories to what is commonly referred to as the Treaty of 1855.⁵¹ The Treaty of 1855 reserved to these Tribes rights to fish at their "usual and accustomed grounds and stations" and the "privilege of hunting, gathering roots and berries, and pasturing their horses on all open and unclaimed lands."⁵² In exchange, the Tribes were forced onto "reservation" lands set forth in the treaty for their "exclusive use" and "occupation"⁵³ and were required to "cede, relinquish, and convey to the United States all their right, title, and interest in and to the lands and country occupied by them." This relinquishment constituted most of the Tribes' traditional lands and territories, used and stewarded by them since time immemorial.⁵⁴

Importantly, the Treaty of 1855 recognized the Tribes' inherent sovereignty to govern their lands and people. It also established the U.S. federal government's enduring obligation to protect and preserve the lands and resources set forth in the Treaty and to fully perform the promises it made to sovereign tribal governments. While each signatory Tribe's history includes the shared provisions of the Treaty of 1855, each affected Tribe's experience with the Treaty's implementation and enforcement has shaped its culture, traditions, and approach to governing its members.

In addition to these specific tribal treaty rights, Washington has policy related to engagement with Washington Tribes outlined in the [Millennium Agreement and Centennial Accord](#).

Washington and Pacific Northwest Tribal perspectives on offshore wind. As of the drafting of this report, Gridworks had undertaken initial engagement with four coastal Washington Tribes on offshore wind issues and engagement processes to support discussion of offshore wind issues. From our initial engagement with individuals and leadership from these Tribes, we understand that several Coastal Treaty Tribes perceive the prospect of offshore wind project development off Washington's Pacific Coast as a potential threat to their treaty rights, traditions, and culture, if not carefully evaluated and considered with Tribal rights front and centered in the discussion.

Gridworks' research looking into letters shared by Oregon and Washington Tribes, as well as research into resolutions passed by Affiliated Tribes of Northwest Indians (ATNI; a nonprofit organization of Northwest Tribes, including Washington Tribes, that is tribal-member led and directed) leads us to believe that, in general, while Pacific Northwest Tribes support the need for renewable energy resource development, particularly in response to climate change, the protection of treaty rights, sovereignty, and stewardship of resources is paramount.⁵⁵

At ATNI's Midyear Convention in Worley, Idaho, a quorum of ATNI members passed a resolution stating: "...Tribes understand the importance of renewable energy and recognize the potential benefits of offshore wind projects. However, we cannot overlook the potential negative impacts to our tribal communities, cultures, and natural resources..."

⁵¹ The Quinault Indian Nation signed the Treaty at the Quinault River on July 1, 1855, and the Quileute Tribe and Hoh Tribe signed the Treaty in Olympia on January 25, 1856. The Makah Tribe signed the Treaty of Neah Bay on January 1, 1855. Notably, additional Tribes are located on Washington's Pacific Coast, such as the Shoalwater Tribe, however only the Quinault, Makah, Hoh, and Quileute are signatories to the Treaty of 1855. Tribes located in in-land Washington also have a considerable interest in offshore wind development, given any potential impacts that development could have on fisheries such as salmon.

⁵² Treaty of 1855, see Article 3

⁵³ Treaty of 1855, see Article 2

⁵⁴ Treaty of 1855, see Article 1

⁵⁵ 2023 Midyear Convention Worley, Idaho Resolution #2023 – 39 "Immediate Action to Develop a Comprehensive and Transparent Procedure for Offshore Wind Project Permitting to Adequately Protect Tribal Environmental and Sovereign Interests."

The resolution went on to ask that BOEM and the U.S. Department of Interior to take immediate action to develop a comprehensive and transparent process that adequately protects Tribal environmental and sovereign interests and includes meaningful and timely consultation with Tribal governments, a comprehensive environmental and cultural impact assessment of offshore wind energy, and a commitment to respect and protect Tribal sovereignty and self-determination. Prior to the development of this process and procedure, ATNI requested that all scoping and permitting for offshore wind projects be halted. The resolution ended with the statement: “We cannot afford to sacrifice our cultural and natural resources for the sake of renewable energy without ensuring that our sovereign interests are protected.”

While no BOEM process has kicked off in Washington, several Tribes in Washington and in other states have formally expressed concerns regarding impacts to the marine environment and to traditional ways of life.⁵⁶ In Washington, the coastal Tribes of Quinault, Quileute, and Hoh expressed similar sentiments in BOEM’s Oregon leasing efforts. In a letter to BOEM dated August 22, 2022, these Tribes stated:

“The use of these floating facilities in the Pacific Ocean will negate the ability of our tribal members to conduct any meaningful commercial or recreational fishing within the area. Anchor cables and suspended power cables will not allow any fishing activity or most shipping activity to occur in wind farm areas. Current sustainable fishing practices generally tow lines or nets through the water and that would cease to be possible in the areas near the proposed wind farms due to the amount of cabling in the water. Further, there is often an exclusion zone surround [sic] an offshore wind project that prohibits entrance by fishing or other vessels.

The recent unprecedented rush to lease areas on the Outer Continental Shelf (OCS) by BOEM for offshore wind development is deeply concerning. The Treaty fish and marine mammal resources that our members depend on now and in the future do not exist only within our Treaty area. Many of those populations move freely up and down the U.S. west coast as migratory stocks. Treaty allocations of migratory fish stocks, including Pacific whiting, black cod, and halibut, are based on estimates by NOAA Fisheries of the proportion of those stocks that migrate through our ocean fishing areas along the Washington coast. Massive offshore wind developments anywhere along the west coast, including the ones proposed, have the potential-and likelihood to negatively impact migratory stocks of fish and marine mammals that pass through usual and accustomed fishing areas.”⁵⁷

Tribal treaty rights to fish are held in common by individual tribal fishers and commercial fisheries owned and operated by tribal governments, and these rights apply to many fisheries (e.g., salmonid or bottom species) as well as methods used by fishers (e.g., long-line, bottom drag nets).

Tribes may view offshore wind development as either a threat to the environment affecting the numbers or quality of fish available to fishers or a blanket prohibition of fishing at development sites, even though development areas may be within their “usual and accustomed” fishing grounds. Both examples could be considered a threat to the rights guaranteed by treaty and could result in the impairment of cultural and traditional activities related to the abundance and timing of fishing activities and harvest.⁵⁸

Other treaty rights potentially threatened by development include the potential for onshore development of offshore wind staging areas or supply stations on or near reservations, thus impacting a tribe’s ability to govern and assure the health, safety, and welfare of its members.⁵⁹ A related issue could be the development of temporary living quarters for project workers near a reservation and the health

⁵⁶ Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians Tribal Government comments on BOEM Draft Wind Energy Areas—Commercial Leasing for Wind Energy Development on the Outer Continental Shelf Offshore Oregon: Docket No. BOEM-2022-0033, October 2023.

⁵⁷ Quileute, Quinault, Hoh comments regarding “Guidelines for Mitigating Impacts to Commercial and Recreational Fisheries on the Outer Continental Shelf Pursuant to 30 CFR Part 585,” Docket ID, BOEM-2022-0033, August 22, 2022

⁵⁸ Treaty of 1855, see Article 2.

⁵⁹ Treaty of 1855, see Article 3.

and safety issues that would result from interaction with transient populations over which the tribal government has little control or authority.

Finally, on initial engagement with Washington Coastal Treaty Tribes, some Tribes raised questions regarding the interpretation of the Treaty of 1855 and rights and properties not expressly included in the Treaty. If rights and properties are not expressly discussed in the treaty, for example mention of areas along the outer continental shelf, then those properties could arguably remain under tribal control, under an inherent right “reserved” to the tribes due to its exclusion from the Treaty’s express provisions.

Washington’s Fishing Industry

Washington State’s commercial fishing industry is vital to both the state’s economy and its cultural heritage. This industry contributes significantly to local and state economies through job creation, supporting thousands of workers in fishing, processing, and related services. The industry also generates substantial revenue from the harvest of various seafood, including salmon, crab, and shellfish, which are in high demand both domestically and internationally.

Washington’s coastal and inland waters provide a rich and diverse marine environment, making it one of the top states in the U.S. for commercial fishing. The robust output and diverse range of species harvested, including salmon, Dungeness crab, and various shellfish, underscore Washington’s critical role in the U.S. seafood industry. This high productivity not only sustains local communities but also supports the broader national seafood supply chain. In 2022, Washington’s commercial fishing industry generated \$4.5 billion in economic value, supported nearly 88,000 jobs, and sold more than \$11 billion in product.⁶⁰ This economic activity translates into significant tax revenues and supports numerous secondary industries, such as seafood processing and distribution.

Additionally, the commercial fishing industry in Washington State holds cultural and environmental significance, as demonstrated by our interviews with coastal community representatives. Many coastal communities have a long history and tradition of fishing, which plays a central role in their way of life and identity. Washington’s Coastal Tribes, in particular, have a deep-rooted connection to fishing, with treaty rights that guarantee access to traditional fishing grounds.

Coastal Zone Management Act and Washington Policies, Plans, and Existing Engagement Forums

Coastal Zone Management Act and Enforceable Policies. The federal Coastal Zone Management Act manages the nation’s coastal resources to preserve, protect, develop, and where possible, to restore or enhance the resources of the nation’s coastal zone. States are given an active role in reviewing federal activities within their coastal zones—defined in Washington State as all lands and waters of the fifteen coastal counties that front saltwater out to three nautical miles from the shoreline—to address their unique issues and needs through state-defined and federally approved Coastal Zone Management Programs. Washington State does not have a single, stand-alone law for coastal zone management. Instead, Washington relies on a framework of existing state laws, regulations, and the Marine Spatial Plan (MSP) for Washington’s Pacific Coast that are all incorporated into the state’s Coastal Zone Management Program as enforceable policies.⁶¹

Within the BOEM leasing process, typically state agencies can provide input into federal leasing efforts but ultimate decision-making rests with BOEM. That said, having a federally approved Coastal Zone Management Program gives Washington State a role in the federal agency decision-making process for activities that could affect the state’s coastal resources and uses. The federal consistency provisions of the Coastal Zone Management Act require that federal actions, including direct federal agency

⁶⁰ <https://s3.amazonaws.com/media.fisheries.noaa.gov/2024-04/FEUS-2022-v03.pdf> page 9.

⁶¹ Relevant Washington State laws include Shoreline Management Act (SMA) – RCW 90.58/WACs 173-15 through 26; Water Pollution Control Act (WPCA) – RCW 90.48/WACs 173-40 through 270 and WACs 372-52 through 68; Washington Clean Air Act (WCAA) – RCW 70.94/ WACs 173-400 – 495; and Ocean Resources Management Act (ORMA) – RCW 43.143, see Ocean Management Guidelines at WAC 173-26-360. <https://apps.ecology.wa.gov/publications/documents/1706027.pdf>

actions and the issuance of federal licenses and permits, be consistent with the [enforceable policies of the Washington Coastal Zone Management Program](#).⁶²

Federal consistency review offers an important way for a state to influence offshore wind leasing decisions, by enhancing coordination and cooperation between the state, federal agencies, and applicants for federal licenses and permits, but it also has some limitations:

Generally, federal consistency applies to federal actions within and outside the coastal zone that could have reasonably foreseeable impacts on land, water, and natural resources of the coastal zone. This includes activities such as ocean energy projects that are federally reviewed by BOEM and are advanced through federal lease sales. The process by which Washington State reviews these activities and makes decisions is summarized by the Washington Department of Ecology in its [Federal Consistency Procedures for the WA State Coastal Zone Management Program](#) publication.

Federal consistency reviews occur at specific points in the BOEM process, and the specific type of federal action determines whether a federal agency or an applicant needs to submit a consistency determination or certification. For example, BOEM's activities related to determining Wind Energy Areas prior to leases may require a consistency determination. This is different from BOEM's activities issuing leases or issuing permits, which may require a consistency certification.⁶³

For federal actions conducted by a federal agency, the federal agency prepares a consistency determination that demonstrates whether its activity is either "fully consistent" or consistent "to the maximum extent practicable" with the state's enforceable policies. If the state objects to the consistency determination, the federal agency can still proceed with its activity if it describes the legal impediments to being fully consistent, or it concludes that the activity is fully consistent.

For federal actions, in which a federal lease or permit is required, the applicant prepares a consistency certification that demonstrates its licensed/permitted activity is "fully consistent." If the state objects, the federal agency is prohibited from issuing the permit. To proceed with permitting, the applicant must either appropriately amend the license/permit or successfully appeal the state's objection to the federal Secretary of Commerce.

Enhanced Federal Consistency Review. State Coastal Zone Management Programs have authority to enhance their federal consistency review process by establishing a Geographic Location Description, a federal consistency review tool used for specific purposes, like marine renewable energy development. A Geographic Location Description is a designated area within federal waters where a predetermined list of federal license or permit activities are determined to have reasonably foreseeable effects on a state coastal uses or resources.

Developing this tool would ensure that Washington State has the opportunity to review specific federally permitted or licensed activities in federal waters off the Pacific Coast of Washington, outside the state's designated coastal zone. State review of proposed offshore wind projects under the CZMA is not automatic unless a state lists offshore wind authorization in its coastal management program and NOAA approves a Geographic Location Description for the state.

While a Geographic Location Description does not include specific management measures, it does highlight the state's geographically defined interests relative to listed activities and ensures federal consistency review will occur. Without the designation of a Geographic Location Description under CZMA, federal consistency reviews would occur either with specific federal approval of a proposed activity, at the discretion of the federal permitting agency, or when an applicant requests federal permits or leases. These opportunities also typically start a clock for state response; for example, upon federal approval of a proposed activity, the state has 30 days to respond.

⁶² <https://apps.ecology.wa.gov/publications/documents/2006013.pdf>

⁶³ <https://www.boem.gov/environment/environmental-assessment/coastal-zone-management-act>

To date, Washington State has considered developing a Geographic Location Description but has not formally initiated the process with NOAA.

Washington's state policies and Marine Spatial Plan. In 1989, the Washington Legislature passed the Ocean Resources Management Act (ORMA)^{64,65} in recognition that "Washington's coastal waters, seabed, and shorelines are among the most valuable and fragile of its natural resources." The state Legislature found that Washington's coastal areas are "faced with conflicting use demands and some may, at times, pose unacceptable environmental or social risks." The Legislature went on to acknowledge the importance of existing uses stating, "ocean and marine-based industries and activities, such as fishing, aquaculture, tourism, and marine transportation have played a major role in the history of the state and will continue to be important in the future." ORMA and its implementing administrative rules are CZMA enforceable policies.

The state's Ocean Use Guidelines, found in WAC 173-26-360 implementing ORMA, expand ORMA's geographic scope to include Shoreline Management Act⁶⁶ jurisdiction and include, "the near shore area under state ownership, shorelines of the state, and their adjacent uplands." ORMA describes policies and establishes guidelines for state and local authorities when reviewing projects affecting Washington's coastal waters. ORMA's policy is to protect Washington's valuable and fragile coastal waters, seabed, and shorelines while, at the same time, recognizing that marine-based industries and activities such as fishing, aquaculture, tourism, and marine transportation are important for Washington's future.⁶⁷

Washington's Marine Waters Management and Planning Act (RCW 43.372) provides the overall intent, purpose, principles, and elements for development of Washington's Marine Spatial Plan (MSP).⁶⁸ The MSP creates a framework for integrating existing state and local authorities, primarily ORMA and its implementing guidelines, but does not supersede authority of state agencies or local governments (RCW 43.372.060). For example, local city or county Shoreline Master Programs are one of the many existing authorities that set forth more detailed requirements for ocean uses within local jurisdictions.

The MSP contains two additional enforceable policies and guidelines that regulate new ocean uses to help protect the coast's unique existing uses and sensitive ecological areas: The MSP framework as described in Chapter 4 applies to "new" uses of the coastal and offshore environment—typically defined as something that has not been previously permitted or authorized, including ocean energy projects. The MSP study area consists of marine waters of the Pacific Ocean adjacent to Washington's coastline from the intertidal zone out to the continental slope. It extends from the ordinary high water on the shoreward side out to a water depth of 700 fathoms (4,200 feet) offshore, a distance ranging from 35 to 55 nautical miles off the Washington coast. It extends along the coast from Cape Flattery on the north of the Olympic Peninsula south to Cape Disappointment at the mouth of the Columbia River as well as the estuaries of Grays Harbor and Willapa Bay. A Geographic Location Description tool, as mentioned in the subsection above, would extend federal consistency authority beyond state jurisdiction for review of specific types of federal actions that have potential impacts to the state resources.

The MSP assists local and state agencies and others in evaluating and engaging in proposals for new ocean uses and guides potential applicants as they develop those proposals, including key principles that must be complied with per state law.⁶⁹ The plan also identifies the various local and state

⁶⁴ <https://app.leg.wa.gov/rcw/default.aspx?cite=43.143>

⁶⁵ ORMA's jurisdiction extends from mean high tide seaward three miles along the Washington coast from Cape Flattery south to Cape Disappointment, including Grays Harbor, Willapa Bay, and the Columbia River downstream from the Longview Bridge.

⁶⁶ The goal of the Washington State Shoreline Management Act, passed in 1971, is to "prevent the inherent harm in an uncoordinated and piecemeal development of the state's shorelines." It requires all counties and most towns and cities with shorelines to develop and implement Shoreline Master Programs that include policies on shoreline use, environmental protection and public access.

⁶⁷ <https://ecology.wa.gov/water-shorelines/shoreline-coastal-management/ocean-management>
⁶⁸ <https://apps.ecology.wa.gov/publications/documents/1706027.pdf>

⁶⁹ According to RCW 43.372.040(4), "The marine management plan must be developed and implemented in a manner that:

- a) Recognizes and respects existing uses and tribal treaty rights;
- b) Promotes protection and restoration of ecosystem processes to a level that will enable

authorizations that a project may be required to obtain, such as city or county shoreline permits under a local government's Shoreline Master Program⁷⁰ and aquatic land use authorizations from the Department of Natural Resources. State agencies, including the Department of Fish and Wildlife, Department of Ecology, Department of Natural Resources, and others are charged with implementing the MSP.

The MSP includes:

- an overview of federal and Tribal management in the MSP study area;
- a summary of current conditions and trends of the MSP study area, including: ecology, socio-economics, archeological and historic resources, existing ocean uses, and potential new ocean uses;
- details about spatial analyses, including methods and outputs examining ecology and human uses; and
- a management framework that covers process and substantive requirements tied to existing state laws, policies, and the need for consultation with Tribal governments.

Chapter 2 of the MSP contemplates marine renewable energy, including offshore wind, as a potential new use of ocean space within the MSP study area, requiring the MSP to address its possibilities through development of maps summarizing locations with high potential for marine renewable energy and minimal conflicts as well as the development of a framework for coordinating local and state agency review of proposed energy projects. Chapter 2 contemplates potential compatible co-uses with marine renewable energy, as well as environmental concerns largely due to a lack of data and uncertainty about potential environmental effects from marine renewable energy deployment at scale. Chapter 2 also discusses use conflicts, such as with the shipping industry, fishing industries, and research and military activities. It goes on to outline best management practices BOEM has used to avoid or mitigate conflicts between current ocean uses and offshore wind facilities, suggesting that Washington may desire a tailored set of best management practices to meet local needs.

Chapter 4 of the MSP lays out its management framework, including recommendations to address new potential ocean uses in Washington's marine waters, such as marine renewable energy. Chapter 4 recommends early Tribal consultation and sets out criteria for: ocean use planning and project review; coordinated state agency and local government review of proposed renewable energy developments; a procedure to request the establishment of a BOEM task force if or when potential renewable energy projects are considered likely; requirements that project applicants conduct stakeholder engagement; the development of a Pacific Coast Science and Research Agenda process to improve scientific information available for managing ocean resources; adaptive management of the MSP such as by updating maps and data; and standards for avoiding and minimizing impacts to fisheries and coastal uses.

Washington's Existing Marine Use Engagement Forums. As part of its efforts to enact marine use and planning laws, Washington State established several coastal advisory groups, known as the marine resource committees, to seek direct involvement and advice from stakeholders on coastal marine issues, including the development of Washington State's Marine Spatial Plan. Another advisory body,

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- long-term sustainable production of ecosystem goods and services;
 - c) Addresses potential impacts of climate change and sea level rise upon current and projected marine waters uses and shoreline and coastal impacts;
 - d) Fosters and encourages sustainable uses that provide economic opportunity without significant adverse environmental impacts;
 - e) Preserves and enhances public access;
 - f) Protects and encourages working waterfronts and supports the infrastructure necessary to sustain marine industry, commercial shipping, shellfish aquaculture, and other water-dependent uses;
 - g) Fosters public participation in decision making and significant involvement of communities adjacent to the state's marine waters; and
 - h) Integrates existing management plans and authorities and makes recommendations for aligning plans to the extent practicable."

⁷⁰ Under the Shoreline Management Act, local governments (cities or counties) develop Shoreline Master Programs (SMPs) that regulate local permit decisions over shoreline development. For all counties and a few cities on the Pacific Coast, this local jurisdiction also extends to three nautical miles.

the Washington Coastal Marine Advisory Council (WCMAC), serves as a coast-wide forum for ocean policy, planning, and management issues on the state's Pacific coast, advising the governor, Washington Legislature, and state and local agencies on ocean policy, planning, and management issues. Appointed by the governor, WCMAC representatives include a variety of relevant interest groups, including citizens, commercial fishing, conservation, economic development, education, energy, recreation, recreational fishing, ports, shellfish aquaculture, shipping, and science interests. In 2022, WCMAC established a technical working group to examine offshore wind issues. The committee developed recommendations regarding stakeholder engagement around offshore wind development, which were later reviewed and approved by the full WCMAC and provided to the Governor's Office.⁷¹

Additionally, Washington Department of Ecology leads the State Ocean Caucus (SOC), a state interagency team that focuses on ocean policy management. State Ocean Caucus agencies include Washington Department of Natural Resources, Department of Fish and Wildlife, Washington Sea Grant, and Washington State Parks and Recreation Commission. The SOC is tasked with implementing the MSP and to ensure Washington maintains a resilient, healthy coastal marine ecosystem.⁷² The MSP specifies that "state and local agencies will coordinate their roles and review of new ocean use proposals" and the SOC will "assess needs to further specify how best to coordinate on individual, proposed projects and to create more detailed agreements for their review process, as needed."⁷³

State Energy Strategy and Washington Policy Regarding Offshore Wind

Washington state has a number of clean energy objectives, such as the state's Clean Energy Transformation Action that calls for the state's electric utilities to be 100% carbon free by 2045 and the Climate Commitment Act that caps and reduces greenhouse gas emissions from Washington's carbon-emitting resources and industries. As part of Washington's efforts to meet its clean energy objectives, the 2021 Washington State Energy Strategy provides a road map for meeting the state's need for clean, affordable, and reliable energy supplies and outlines a path to a clean energy economy by 2050.

In the 2021 Energy Strategy modeling analysis of the state's most cost effective decarbonization pathway, researchers anticipated Washington adding 4 gigawatts of offshore wind to its energy portfolio between 2040 and 2050.⁷⁴ One of the 2021 Washington State Energy Strategy recommendations called for state action to help fund the identification of clean energy development zones through stakeholder engagement.^{75,76,77}

The Washington State 2023 Biennial Energy Report, a biannual report containing updates on progress to meeting the state energy strategy goals, recognizes that Washington utilities and planners will continue to explore offshore wind, however to-date offshore wind has not become cost competitive with wind resources in the Mountain West or solar in the Southwest.^{78,79} Expansion of interstate transmission, which has proven slow and difficult to develop in the past, will be necessary to enable Washington's use of out-of-state onshore wind and solar resources.⁸⁰

Regarding the creation of in-state resources, the 2023 Biennial Energy Report also states: "In-state projects offer opportunities for economic development, including job creation, workforce development,

⁷¹https://www.ezview.wa.gov/Portals/_1962/Documents/WCMAC/WCMAC%20Offshore%20Wind%20Recommended%20Principles%20of%20Engagement%20to%20Gov._Final_01.10.2023_Signed.pdf

⁷² <https://ecology.wa.gov/water-shorelines/shoreline-coastal-management/ocean-management/marine-spatial-planning>

⁷³ <https://apps.ecology.wa.gov/publications/documents/1706027.pdf>

⁷⁴ Washington 2021 State Energy Strategy, December 2020, page 48

⁷⁵ Washington 2021 State Energy Strategy, December 2020, page 118.

⁷⁶ 2023 biennial Energy Report, page 23.

⁷⁷ Chapter 230, Laws of 2023 identifies a process for recommending clean energy zones, among other permitting procedures for clean energy projects. It is unclear to the research team if or how this law addresses offshore wind, which would likely be sited in federal waters.

⁷⁸ 2023 biennial Energy Report, page 18-19.

⁷⁹ Washington 2021 State Energy Strategy, December 2020, page 119 and 2023 biennial Energy Report, page 18-19.

⁸⁰ Washington 2021 State Energy Strategy, December 2020, page 119.

and capital investment. These projects must also adhere to the state's commitments to respect and uphold tribal sovereignty, protect natural resources, and create direct benefits in the communities where these projects occur. Understanding competing land uses and being aware of culturally significant areas and areas where tribes have rights to resources can help the state better target areas that have high production potential for solar, wind and other sources of renewable energy, and better protect conservation and agricultural lands and tribal resources."⁸¹

The prospect of Washington offshore wind meeting Washington's electric power needs is driven by its strong winter electricity production profile that matches Washington's winter power needs, combined with the potential for short overland transmission pathways to major Washington load centers.⁸²

The feasibility of offshore wind transmission development is still under investigation. As noted above, onshore transmission development is already a lengthy process, and it remains to be seen what additional jurisdictional, development, and environmental challenges will be raised in an offshore environment. Pacific Northwest National Labs is performing some of the first large-scale offshore wind transmission modeling that includes examining the overland transmission needs of Washington offshore wind. Results of this modeling study are expected by the end of 2024.⁸³ The federal Department of Energy is also exploring recommendations to improve offshore wind transmission planning and development efforts, with DOD recommendations expected sometime in late 2024 or early 2025.

Beyond a policy initiative exploring the potential for Washington state to benefit from the offshore wind supply chain,⁸⁴ the state does not have a direct policy supporting or scoping the examination, exploration, or development of offshore wind off the Washington Coast, nor does Washington have explicit policies shaping any future offshore wind development undertaken by the federal government or private developers. This lack of policy around whether offshore wind is appropriate for Washington's particular unique considerations, both in terms of energy policy and marine conservation and co-use policies, has, as outlined in the section below, created several questions from impacted Tribes, stakeholders, and community groups about why the state would consider exploring offshore wind development off the Washington Coast within a BOEM process or outside of it.

Summary of Washington Interviews and Synthesis of Research

Summary of Gridworks' interview process.

Following Gridworks' research into other jurisdictional experiences with BOEM offshore wind planning and evaluation processes (detailed in Appendix B) and alongside our research into Washington's unique considerations relevant to offshore wind planning and evaluation, Gridworks invited and convened discussions with Washington communities and interests who would be most impacted by the development of offshore wind off the Washington Coast to understand how to engage these perspectives in potential future offshore wind planning or evaluation discussions. The goal of these conversations was to uncover best practices and procedures identified by Washington Tribes, residents, industry, and interests that Washington should consider in its evaluation of offshore wind, including gaps in existing data necessary to support an inclusive and participatory offshore wind evaluation process.

We invited discussions with coastal Tribes, inland Tribes, tribal-led organizations, coastal local governments representing community voices, coastal ports, coastal economic development and tourism organizations, commercial and recreational fishing and fish processing representatives, labor representatives, coastal and Washington-based conservation organizations, coastal and Washington-based oceanographic research institutions, maritime industry representatives, clean energy representatives, and offshore wind developers. We also met with state agencies tasked with energy policy development and marine resource management as well as the Washington Coastal Marine Advisory Committee and its offshore wind technical subcommittee. Gridworks additionally welcomed

⁸¹ 2023 biennial Energy Report, page 22.

⁸² System Value of Offshore Wind in Washington, Trident Wind Study, prepared by E3, May 23, page 13, and page 21 and 23.

⁸³ <https://www.pnnl.gov/projects/west-coast-offshore-wind-transmission-study>.

⁸⁴ [Blue Wind Supply Chain Collaborative](#)

supplemental contacts identified by participants in our process, including the federal Department of Defense.

Meetings were scheduled based on participant availability and willingness to engage in our process. The length of meetings varied depending on participant availability and number of attendees in a call or in-person meeting, but generally ranged between 1 and 3 hours per meeting to include a period of orientation to the discussion and time for conversation. Table 1 below shows our meeting cadence and the organizations we engaged with. This list is not comprehensive of all organizations invited to participate, as some declined our invitation.

Table 1: Meeting Date, Duration, Group Focus, and Attendee Organizations

Meeting Date	Duration	Group Focus	Attendee Organizations
February 14, 2024	1 hour	WCMAC briefing	WCMAC
February 20, 2024	1 hour	Coastal tribal briefing	Coastal tribes
February 23, 2024	1 hour	State tribal briefing	Tribes in Washington State
March 19, 2024	2 hours	Commercial fishing	Midwater Trawlers Cooperative, WA Coast Marine Resources Committee representatives, Columbia River Crab Fishermen's Association, Pacific Seafoods, Mothership Processor, Western Fishboat Owners Association, Fishing Vessel Owner's Association, Pacific Seafoods, Washington Dungeness Crab Fishermen's Association, United Catcher Boats, Pacific Whiting Conservation Cooperative, American Albacore Fishing Association, West Coast Seafood Processors Association
March 20, 2024	2 hours	Recreational fishing	American Sport Fishing Association, Coastal Conservation Association in WA
March 25, 2024	3.5 hours	Commercial and recreational fishing	Midwater Trawlers Cooperative, WA Coast Marine Resources Committee (representatives, Columbia River Crab Fishermen's Association, Pacific Seafoods, Mothership Processor, Western Fishboat Owner's Association, Fishing Vessel Owner's Association, Pacific Seafoods, Washington Dungeness Crab Fishermen's Association, United Catcher Boats, Pacific Whiting Conservation Cooperative, American Albacore Fishing Association, West Coast Seafood Processors Association, American Sport Fishing Association, Coastal Conservation Association in WA,
March 25, 2024	1.5 hours	Local government	City of Ilwaco and City of Forks representatives
March 26, 2024	2 hours	WCMAC OSW Technical Committee	WCMAC OSW Technical Committee

March 27, 2024	2 hours	Labor	Blue Green Alliance, Washington State Labor Council, Inland Boatmen's Union of the Pacific, International Brotherhood of Electrical Workers Local 77
March 27, 2024	1 hour	State Ocean Caucus	State Oceans Caucus Members
March 28, 2024	2 hours	Pacific County, ports, economic development	Port of Ilwaco, Port of Chinook, Pacific County Commission, Pacific County Economic Development Council representatives
March 28, 2024	1 hour	State Dept. of Ecology	State Dept. of Ecology
April 8, 2024	2 hours	Clean energy advocates	Climate Solutions, Renewable NW, Northwest Energy Coalition
April 8, 2024	1 hour	Maritime industry	Pacific Shipping Merchant Association
April 10, 2024	2 hours	Marine conservation	NRDC, NWF, Audubon, and Surfrider Foundation
April 10, 2024	1 hour	Marine and oceanographic research	PNNL, University of Washington, NOAA
April 10, 2024	1 hour	Local government	Clallam County representative
April 11, 2024	1.5 hours	Tribal-led organization	Affiliated Tribes of Northwest Indians
April 12, 2024	45 minutes	Marine energy research	University of Washington researcher
April 14, 2024	1 hour	Ports	Port of Grays Harbor representative
April 16, 2024	30 minutes	Local Government	Grays Harbor County representative
May 6, 2024	45 minutes	Marine Resource Committee representatives	Pacific MRC representative
May 6, 2024	45 minutes	Marine Resource Committee representatives	Grays Harbor MRC representative
May 8, 2024	2 hours	WCMAC	WCMAC
May 13, 2024	1.5 hours	Tribal representatives	Quileute Tribe representatives
May 14, 2024	3 hours	Tribal council	Hoh Tribe

May 15, 2024	1.5 hours	Tribal representatives	Shoalwater Tribe representatives
May 15, 2024	2 hours	Tribal council	Quinault Tribe
May 22, 2024	1 hour	State Ocean Caucus	State Ocean Caucus members
May 24	30 minutes	Developer	Hecate
May 24	1 hour	Federal Government	Department of Defense

These outreach meetings gathered insights and input from participants across a number of topics related to offshore wind evaluation processes. Meeting summaries were shared with participants to ensure mutual understanding of our conversations. Participants were invited to continue to engage with the project and future meetings, including public comment meetings scheduled prior to report finalization.

Outreach meetings began with a welcome from the facilitator and roundtable participant introductions. Introductions were followed by a brief Gridworks' presentation on Washington Offshore Wind Engagement Project background, takeaways from our research conducted to-date, and the purpose of the outreach meetings. Participants were then provided question-and-answer opportunities, before the facilitated conversations began. Discussion for each outreach meeting varied based on timing, target audience, and participant interest areas. Input grouped by topic and participant type are provided in Appendix C while a synthesis of our discussions and research can be found in the subsection below.

Synthesis of BOEM research, findings from other state processes, and Washington interviews

Of the states Gridworks researched—Oregon, California, and Maine—each has taken different approaches to planning and evaluation for offshore wind and the processes to understand and develop policy goals around offshore wind: Initially, the state of Oregon did not establish work groups or committees to consider actions to lease Oregon offshore wind resources, though the future of offshore wind in the state was discussed in hypothetical, study-oriented contexts.⁸⁵ In contrast, Maine's Governor's Office took an active interest in developing offshore wind off the state coast and created its own roadmap for offshore wind development in the Gulf of Maine. As a result of legislation, Maine also stood up a committee with working groups to pursue offshore wind development under a "best practices" approach. California legislation designated the California Energy Commission as lead agency to coordinate state agencies as it developed offshore wind goals and a strategic plan for offshore wind development.⁸⁶

While BOEM's examination of offshore wind development and the circumstances surrounding that examination were different from state to state (see Appendix B for details), we can find common themes supported by our interviews with Washington stakeholders:

State leadership and offshore wind "road maps." States typically provide leadership in offshore wind evaluation efforts with processes that at least run in parallel, if not start before, BOEM's initiation of its leasing process.⁸⁷ BOEM's leasing efforts to-date and in the states we researched were largely centered on the central question of determining lease areas. They were not structured to be the avenue in which states determine any values or priorities around offshore wind development, initiate new research, or

⁸⁵ Oregon did produce its own [literature review study of Oregon offshore wind](#) that included public engagement.

⁸⁶ California Energy Commission: '[Offshore Wind in California](#)'

⁸⁷ The initiation of the BOEM leasing process starts with a request for interest from developers and a Call for Information to begin the process of identifying Wind Energy Areas. [RE Leasing Process Poster v2.pdf \(boem.gov\)](#).

definitively understand impacts to marine co-uses. Rather, state actors engaging in a BOEM process brought their insights about state information or priorities to BOEM's process, either by informational presentations and discussion at a task force or by writing comments as part of a formal record for BOEM's efforts to establish lease areas.

An element of state processes that we have repeatedly found in our research is the concept of a “road map.” Maine, California, and, through 2024 legislation, now Oregon have designed and engaged state-led road maps for planning for, evaluating, considering, or moving to realize the potential of offshore wind.

The Maine roadmap process created committee structures and processes to provide formal roles for participation by stakeholders and communities in order to make a space for every offshore wind viewpoint and include those reflections in the final road map product. The road map process provided explicit opportunities for the different aspects of offshore wind to be examined by diverse viewpoints, even if those opportunities were not realized to the level all stakeholders and Tribes expected. Initiated through executive branch action, the road map produced legislative recommendations regarding offshore wind that were then followed by legislative action directing and establishing additional actions in explicit pursuit of offshore wind.

California's pursuit of offshore wind began with executive action but was soon followed by legislative action establishing the California Energy Commission as the point agency for stakeholder engagement and the substantive content of several new examinations of offshore wind including a road map. The legislation established a coordinated coherence to the processes and objectives for multiple different agencies and a set of objectives for those agencies to pursue, including public engagement processes. This coherent structure of examining and planning for offshore wind enabled stakeholders to focus their efforts.

Skepticism of the BOEM leasing process. BOEM's issuance of a lease largely just provides for lessee access to the federal waters outlined in its lease area to further study impact issues and refine project proposals—which may or may not ever be granted permits for development. However, many stakeholder groups and Tribal representatives we interviewed were skeptical that BOEM would decide not to issue project permits to developers after both BOEM and the developer had already spent significant efforts on offshore wind planning and development efforts.

Gridworks cannot speculate on what federal or state regulatory decision-makers may or may not do as new information about offshore wind project proposals and potential impacts or benefits to Tribes, communities, state energy goals, and the environment becomes available, however we do conclude that Washington participants' skepticism about how the federal government intends to move forward with leases and projects with or without taking local stakeholder and Tribal input into account indicates a fundamental lack of trust in the federal efforts to lease federal waters to offshore wind developers.

Stakeholders' primary concerns include transparency, maintaining opportunities to determine that offshore wind is not good for Washington State or its coastal communities, and preserving tribal rights as well as stakeholder power to effectively advocate for things like community benefits, labor agreements, and more in project development. Stakeholder concerns suggest that to get their buy in, Washington needs to prepare extensively to guide any BOEM process should one be advanced (including preserving an option to say no to leases through a process exit ramp or other methods), helping BOEM achieve greater stakeholder involvement in a planning and evaluation process for federal leasing, and upholding values of science-based decision-making.

If a BOEM planning and evaluation effort were initiated in Washington prior to the launch of other important conversations identified through our interview process, we conclude that that federal planning and analysis effort would be viewed by Washington stakeholders and coastal communities as not transparent, not meaningfully engaging of Washington Tribes and stakeholders, and not science-driven.

Data gathering and research. Most stakeholders we interviewed spoke of the need to better understand impacts to offshore wind development prior to issuance of a developer lease. They shared

concerns that impacts will be discovered too late in a process to reverse or pause development or use of offshore wind facilities, and that rather than avoiding impacts only mitigation would be possible.

Meanwhile, our research shows that states, with the input of Tribes and stakeholders, continue to work to scope the additional scientific understanding of the marine environment that would improve overall understanding of the impacts of offshore wind.

The current lack of understanding of offshore wind's potential impacts to the marine environment and coastal communities has become a key point of contention in offshore wind evaluation processes, particularly in Oregon. However, BOEM's obligation to understand impacts and environmental issues through its issuance of leases is based on best available science, and BOEM is not itself a research entity that would likely develop additional studies. This indicates that states would be well-served by supporting or coordinating the launch of priority studies before or alongside the BOEM's offshore wind evaluation process.

Transparency, Trust, and Engagement. All stakeholder groups Gridworks met with in our interview process expressed shared concerns about the inclusivity and transparency of BOEM offshore wind planning and analysis processes, the main avenue through which offshore wind leasing and development in federal waters subsequently occurs. All stakeholder groups Gridworks met within our interview process shared a desire for more meaningful engagement around offshore wind planning and evaluation for both stakeholders and Tribes. However, individual organizations also shared differing views on what meaningful engagement and transparency mean to them, how quickly planning or evaluation efforts should be set up, and whether efforts should happen through state-led processes or through BOEM processes.

Our research and interviews show that stakeholder requests for transparency and inclusivity are largely about how stakeholders are included or not included at tables of discussion, whether they feel heard in those discussion, whether their input has demonstrably impacted decision-making, and understanding how decisions are made. This includes how the input they provide has affected or not affected decision-making. To improve transparency, states and BOEM could work to define the scope and intent of their processes up front, including clear definitions of decision points, criteria for decision-making, and opportunities for Tribal and public engagement along the way, and then make concerted efforts to enact those engagement aspirations (such as by providing time and capacity in a decision-making process to meet with stakeholders for conversations, not just informational presentations). Decision-makers would do well to communicate any changes to those processes as well as reasons for those changes early and often.

Stakeholders are also skeptical about decision-makers intentions, which lends an element of trust to the transparency issue. Trust-building, especially with impacted communities, is a long-term effort, and the extent to which stakeholders and communities believe decisions are pre-determined impacts how they view a process as transparent or a decision-maker as trust-worthy.

Moving forward with offshore wind planning and evaluation.

How Washington can set up a planning and evaluation process for offshore wind that is transparent, that is meaningfully engaging of Washington Tribes and stakeholders, and that is science driven is Gridworks' fundamental task through our research efforts. Washington Tribes and stakeholders we interviewed spoke to us about what might be transparent, meaningful, and science-driven from their individual perspectives, some of which is shared by most if not all groups and identified below:

- **Washington stakeholders shared that Washington should prepare itself to get ahead of and play an active role in a BOEM planning and analysis process before entering the process in order to ensure federal efforts are meaningful and transparent.** Gridworks research into other state planning efforts validates this idea: Historically, federal advisory bodies tasked with assisting BOEM in its offshore wind planning and analysis efforts center around governmental participants advising BOEM based on known and understood information, whether that information is about environmental concerns or about community impacts. Additionally, BOEM is only required to use best available research and evidence to inform its

decision-making; BOEM is not required to undertake additional studies to inform its decision-making. Our research demonstrates that California was successful in guiding BOEM's planning and analysis efforts because it was able to play an active role in the BOEM process upfront and, through that upfront work as well as considerable on-going efforts throughout the planning and analysis phase of BOEM's process, was positioned to influence inclusion of priorities like community benefit provisions into BOEM's leasing efforts. Additionally, Washington state will have a limited time frame to exercise its jurisdictional authorities relative to any federal decision-making and would benefit from having a detailed catalog of those authorities prior to entering a federal process in order to properly exercise the state's authorities.

- **Washington stakeholders and Tribes shared a need for the state to articulate why, how, or under what circumstances it is considering offshore wind development off the state coast.** Our research validates the need for the state to clearly state value-, policy-, and/or science-based priorities to provide clarity around the state's consideration of offshore wind. Articulating values or goals specific to offshore wind will inform both state actors tasked with uplifting those priorities in any future BOEM offshore wind planning and analysis processes and provide clarity to Washington stakeholders, enabling *their* effective participation in future offshore wind planning and analysis process. One suggestion from clean energy participants in our process has been that the state update its Energy Strategy to articulate how offshore wind might enable Washington to meet its clean energy targets. Other options demonstrated by the states of Oregon, California, and Maine, could be policy directive from the state legislature or executive branch that any offshore wind development in federal waters off the Washington Coast, should it occur, should be developed responsibly, center community and Tribal input in project proposals, and ensure that negative impacts are mitigated and that positive benefits flow to impacted communities.
- **Washington Tribes share a need for more coordinated efforts from federal and state governments exploring offshore wind and more time and capacity funding to respond to those efforts.** Of the tribal representatives we interviewed, all shared concerns about the timeline of the federal government's initiatives to build offshore wind, as well as their need for more time to engage on the issues, conduct studies, and access funding to staff up for a long-term effort to understand and evaluate offshore impacts. Most Tribes we interviewed requested capacity funding from the state and/or the federal government to engage in and navigate offshore wind conversations, particularly impacts and science issues. They also articulated the need for funding to be upfront, flexible, and under tribal direction to build internal capacity.
- **Washington Tribes share concerns about how offshore wind could impact tribal rights, way of life, and stewardship of the natural environment even as they support renewable energy.** Of the tribal representatives we interviewed, all shared concerns about how offshore wind would impact treaty rights as well as other tribal rights, culture, and stewardship of natural resources and emphasized the need for more targeted government-to-government consultation from the state and the federal government on this issue. Representatives of Coastal Treaty Tribes additionally articulated that treaty rights are paramount in their consideration of offshore wind and that they have concerns about the potential negative impacts of offshore wind both in and outside of unusual and accustomed fishing areas. Several tribal representatives we interviewed shared concerns that offshore wind is being positioned as "green energy" but may have significant negative environmental impacts. Several tribes representatives also highlighted the need for indigenous knowledge and science to be included and respected in planning and analysis assessments, among other study requests.
- **Washington Tribes and stakeholders share concerns that the benefits of offshore wind will not flow to communities.** They would like to understand more about what benefits are likely to materialize versus those that are promised, and would like to ensure benefits that flow to communities are also defined by those impacted communities.
- **Washington stakeholders and Tribes share concerns about when and how environmental analysis and other research takes place within BOEM's planning and analysis process for determining offshore wind leasing areas.** Many stakeholders and Tribes want ecosystem issues studied on a coast-wide basis, rather than state-by-state. They would like to see a cumulative impact analysis and/or programmatic environmental impact statement, or similar assessments, addressing data gaps at the start of the BOEM process during the planning and analysis phase, rather than after leases are auctioned and project proposals come in (at which point, many stakeholders believe the only recourse is mitigation of impacts rather than avoidance). Stakeholders, and particularly research interests, also share that the studies needed

to understand impacts to the California Current Large Marine Ecosystem and then to set up monitoring and evaluation of offshore wind impacts will take years to develop. Additional data gaps and questions about offshore wind impacts span topics including:

- Impacts and/or benefits of transmission build-out on coastal communities,
- Impacts to fisheries and fish production/stock assessments and habitat,
- Impacts to marine protected areas and species,
- Impacts and/or benefits to local jobs, economic development, and other socio-economic issues, and
- Impacts to shipping routes, military and research activities, and tribal usual and accustomed fishing areas, among other topics.

Participants also expressed the need to identify effective ways of sharing data and information that has already been collected. For example, research information and geospatial mapping could be consolidated and made public and available through public databases.

- **Washington stakeholders share concerns about when and how BOEM's planning and analysis process for determining offshore Wind Energy Areas handles conflicts with other ocean co-uses.** As with environmental analysis efforts, Washington stakeholders want to see potential siting conflicts addressed upfront, prior to BOEM Call Area or draft Wind Energy Area issuance. Examples of these siting conflicts include unique environmental, tribal, and co-use considerations such as the location of the Olympic Coast National Marine Sanctuary, tribal usual and accustomed fishing areas, known Department of Defense sensitive areas, known important fishing grounds, and known important shipping routes and safety buffer zones. Stakeholders like the fishing community as well as agencies such as the Department of Defense encourage BOEM to reach out to impacted interests prior to BOEM's issuance of Call Areas so that these conflicts may be removed from Call Area drafts prior to those drafts being issued for public comment.
- **Washington stakeholders share concerns about how information collected from stakeholders and Tribes would be used to inform decision-making in any federal or state-led process.** All stakeholders shared that while BOEM has collected vast numbers of comments from many and varied interests collectively expressing skepticism and concern over process and recurrent requests for environmental and community impact analyses, BOEM has not provided direct responses or answers, frustrating many participants. Stakeholders we interviewed shared a common element to their definitions of what would constitute transparent engagement: Transparent means answering questions, examining and addressing issues Tribes and stakeholders raise, and proactively communicating how that input informed decision-makers' choices, or how it didn't.
- **Washington stakeholders and Tribes shared a need for any process to plan for and evaluate offshore wind off the Washington Coast to include an opportunity for not moving forward in the process if and when it becomes apparent that offshore wind is not appropriate for Washington.** Stakeholders and Tribal requests for this opportunity, or "off ramp," largely centered around how offshore wind planning, analysis, and development should respond to changes to our understanding about the environmental and community level impacts of offshore wind and hold possible the option that offshore wind not be developed off the Washington Coast.
- **Washington stakeholders shared a concern about the inclusivity of federal planning and analysis efforts through BOEM's intergovernmental task force.** Stakeholders shared that there is little meaningful way for the public or non-governmental stakeholders to contribute to task force meetings. They also share that BOEM time constraints, especially for public and non-governmental stakeholder comment, are too short to meaningfully engage with the public and non-governmental stakeholders on issues as complicated as offshore wind. For some participants we interviewed, inclusivity in a process means taking time to meet and consult with each Tribe and stakeholder group on their own timeframes.
- **Washington stakeholders also shared a need for early coordination, public and stakeholder engagement, and Tribal consultation to take place well before issuance of Call Areas, Wind Energy Areas, and other proposals developed for decision-making.** To this end, engagement efforts that could improve perceptions of process transparency, meaningful engagement, or trust in decision-makers include:
 - engaging early to invite all possible stakeholders and Tribes prior to launching any formal process, including early notification of timelines and coordination needs,

- engaging Tribal Nations on a government-to-government basis with sufficient meetings, staffing, and information exchange,
 - endeavoring to answer questions that are asked or explaining why those questions can't be answered,
 - hiring neutral, qualified facilitators with a track record of managing controversial and contentious issues and an expertise in facilitating one or more of the issues under discussion,
 - designing engagement processes that allow decision-makers to get to know and respect the communities their decisions impact, such as by offering in-person, on-site meetings in impacted communities, and
 - dedicating the funding and staffing capacity to engage Tribes and stakeholders with the care these processes require as capacity shortfalls can hamper otherwise well intended processes.
- **Washington stakeholders and Tribes share a need for offshore wind planning and evaluation efforts to be conducted carefully, respectfully, and with attunement to the perspectives of those who would be most impacted by development.** Participants in Washington state, particularly Tribes, coastal communities and fishing and marine shipping industries, question the urgency and need for offshore wind planning and evaluation for Washington, particularly in light of a shared fear among many we interviewed of unknown but potentially devastating future impacts to their ocean-based economies and the communities and cultures reliant on those economies. At the same time, participants groups largely had differing levels of understanding for the need for more clean energy, indicating the state would benefit from better communication of the changing energy landscape and its need to develop new resources to meet growing electricity demand. Many participant groups we interviewed agreed that Washington should avoid repeating what they shared as past energy-related mistakes, including impacts to Washington's waterways and keystone species through the development of the Pacific Northwest hydro system, the Washington Public Power Supply System's bond default in pursuing nuclear development, and creating "sacrifice zones" of impacted coastal Tribes and communities.

From Tribes and individual stakeholder groups, we also heard variations on the above themes along with insights and perspectives unique to Tribes and stakeholder groups. This additional input can be found in our discussion matrix in Appendix C.

SECTION 4: RECOMMENDED NEXT STEPS AND FRAMEWORK FOR OFFSHORE WIND PLANNING AND EVALUATION IN WASHINGTON

Gridworks' task through the scope of this project has been to provide the Washington Office of Governor Inslee and the Washington Department of Commerce recommendations to engage in a meaningful, transparent, and inclusive planning and evaluation process for the potential development of offshore wind off the Washington Coast. Per our scope of work, recommendations may center on how BOEM and the state can tailor a BOEM Task Force to Washington's unique needs or may recommend a process(es) to augment the Task Force model. Our report is also to include recommended next steps Washington could take to advance the planning and evaluation of offshore wind development off Washington's coast. As we noted in our project plan, the ultimate outcome of Gridworks' recommendations depends, in large part, on the input we receive through our research and stakeholder and Tribal engagement processes.

As outlined above, our findings demonstrate that the BOEM planning and analysis process leading to longer term offshore wind leasing and project development efforts is not set up to be meaningful, transparent, or inclusive as defined by any of the Washington groups we were tasked with interviewing.

We also find that the planning and analysis phase of BOEM's offshore wind leasing processes doesn't itself allow for the type of science-driven policy development Washington stakeholders expect. Absent careful planning and leg work prior to a BOEM process, we conclude that Washington may find it difficult to navigate and direct a federal leasing effort consistent with Washington's values. We also find that an early step Washington can take to guide any federal planning and leasing efforts is to articulate its values and priorities relative to offshore wind evaluation prior to or early in the BOEM process.

Our recommendations center on helping Washington prepare for a BOEM process, should Washington choose to initiate one, both through identification of off-ramps it might employ in a predominantly federal decision-making process and through identification of Washington's priorities for offshore wind prior to entering a federal leasing effort in order to ensure that effort is accountable and transparent to stakeholders and Tribes and attuned to Washington's unique needs.

The intent of our recommendations that follow is to list important actions Washington should consider through planning and analysis efforts for offshore wind development off the Washington Coast, including actions Washington should consider taking prior to and during any BOEM process. Our subsequent suggestions for an improved BOEM planning and analysis process center largely on Washington stakeholder calls for:

- state leadership prior to and within a BOEM planning and analysis effort,
- inclusion of tribal and stakeholder voices early in planning and analysis efforts, including early efforts to minimize co-use conflicts in identification of call and wind energy areas,
- increased tribal engagement,
- independent review of research needs and data discussions,
- increased dialogue between decision-makers and process participants,
- increased transparency of decision-making criteria and reasoning,
- the implementation of off-ramps in a BOEM leasing process at the planning and evaluation stage, and
- the implementation of Washington's enforceable policies and jurisdictional authorities relative to BOEM decision-making.

Our recommendations also center on Tribes' articulations of concerns for tribal treaty rights, the need to understand environmental impacts and community impacts of offshore wind development prior to pursuing development through a BOEM leasing effort, and respectful positioning of tribal governments as sovereign nations in any future planning and evaluation processes.

Many of our recommendations for an improved federal process can also be extrapolated to state planning and analysis efforts, such as inclusion of non-governmental voices, increased dialogue between process stakeholders and decision-makers, and increased transparency of decision-making.

In developing these recommendations, we focus on these overarching ideas:

Washington state should position itself in a leadership role in a BOEM process, requiring rigorous stakeholder engagement, pre-decisional Tribal consultation, and offramps to the BOEM leasing process that allow the state and its communities to stop a leasing effort if/when the state determines continued pursuit of offshore wind development of the Washington coast is not in the best interests of the state.

Washington state should set itself up for success prior to the initiation of a BOEM process to explore offshore wind leasing off the Washington Coast. The state should understand its authorities, authorities of impacted Tribal governments, and the range of concerns for coastal Tribes, communities, and industries—including concerns regarding potential impacts to the marine environment and other

important marine co-uses such as fishing and shipping—prior to engaging a BOEM federal leasing process. Inviting a BOEM process prior to initiating this leg work may not provide the state sufficient preparation to engage with and lead a Washington-specific planning and analysis process, such as a process that provides off ramps or exits from offshore wind leasing efforts.

Washington state should take time to be inclusive and intentional. The state should provide time, capacity, and monetary investments to enable informed state decision-making in an offshore wind planning and analysis process—namely to determine and articulate the state's policy priorities relative to offshore wind. Taking time to do this leg work may engender trust among Washington stakeholders and Tribes that the challenges experienced in prior BOEM processes will be mitigated in Washington. As one stakeholder in our process put it: "It's clear where the Biden Administration is headed, which I think is the underlying issue with lack of credible engagement with the coastal areas, communities, fisheries, and governments. It's a predetermined outcome."

BOEM and stakeholders will look to the state to inform BOEM of Washington's priorities in a planning and analysis process as BOEM has historically done through the intergovernmental task force.

In determining the state's policy priorities, the state should explore offshore wind relative to other reasonable cost/cost effective clean energy resources to meet the state's energy laws and growing demand for electricity.⁸⁸ That said, offshore wind also poses particular opportunities, challenges, and constraints, indicating that the exploration of cost effectiveness of offshore wind resources must go beyond standard power cost analyses. At any point the state identifies its priorities for offshore wind development absent our recommended process, the state should clearly articulate its goals and intentions to Tribes and stakeholders to enable *their* effective and meaningful participation in subsequent state or federal processes.

Continue pre-decisional engagement with Washington Tribes. Early and thorough engagement with Washington Tribes, particularly Coastal Tribes, will be important for Washington given the Tribes' reserved treaty rights and their long history of stewarding and protecting their resources and ancestral lands. Gridworks had limited engagement with these Tribal governments in the development of our recommendations, and it will be important to continue engaging with the Tribes with a common objective: honoring and preserving Coastal Tribal rights in a Washington-specific offshore wind planning and evaluation process. Ramping up pre-decisional engagement efforts with the Tribes will provide the state a clearer picture of Tribal priorities for engagement in a state or a federal planning and analysis process, honoring their sovereignty.

Recommended next steps and framework for a comprehensive, transparent process to evaluate offshore wind development in Washington state

The following are recommended next steps and a recommended framework for a Washington-specific consultation and public engagement process to guide the planning and evaluation of potential offshore wind development off Washington's coast.

Recommendation 1: Prior to entering a BOEM task force, Washington state should perform a thorough investigation and comprehensive catalog of Washington's legal authorities under CZMA enforceable

⁸⁸ Northwest Regional Forecast of Power Loads and Resources, August 2024 through July 2034, Pacific Northwest Utility Conference Committee, May 2024, page 5. The 2024 ten-year load forecast is 3.1% annually compounding.

policies and other jurisdictional authorities pertinent to potential siting and permitting of offshore wind. For example, the state should catalog its authority over transmission siting in state jurisdictional waters and lands and any other siting and permitting authorities likely relevant to offshore wind. The state should also examine whether the state wants to pursue a geographic location description designation to its CZMA enforceable policies to increase the state's ability to ensure enforceable policies are met. Undertaking this review will position the state to influence federal offshore wind leasing and development processes, from the start of a BOEM planning and analysis process through leasing, site assessments, and construction.

Tactical next steps and considerations: The Department of Ecology, with assistance from other state agencies (State Oceans Caucus agencies, EFSEC, and others) could immediately launch this effort, which could include legal analysis or conducting a table-top exercise to understand when and where state jurisdiction comes into play.

Capacity and funding needs: Capacity and funding needs are likely limited to the staffing resources Department of Ecology and/or other agencies would need to complete this analysis.

Recommendation 2: Washington state should consider development of or support for a regional research consortium that provides independent expert analysis and peer review of, guidance for, and prioritization of research and analysis informing responsible offshore wind development off the Pacific Coast. Research to develop a baseline understanding of the California Current Large Marine Ecosystem and to then understand offshore wind impacts to Washington fisheries and other natural resources will be a complicated conversation that will likely draw on researchers and efforts from across the Pacific Coast, requiring substantial time and funding. The prioritization of studies or pilot efforts to conduct research is outside of our scope and expertise, however we recommend Washington form or support the formation of an entity drawing on West Coast-wide research expertise to scope the additional studies Washington would need to effectively plan for and evaluate offshore wind impacts to the marine environment and coastal communities.

A preliminary list of research study needs identified by participants in our process for consideration include:

- potential impacts to the California Current Large Marine Ecosystem
- changes in upwelling
- changes to surface-level mixing
- changes to larval drift/ocean transport
- impacts to stratification
- impacts to thermocline
- wake effects of turbines
- forage effects
- seabird impacts, including blade collision
- endangered and protected species/habitat impacts
- phytoplankton impacts
- electromagnetic field effects
- impacts to marine mammals and migration
- acoustic noise impacts on ocean life
- social/socio-economic impacts to coastal Washington
- fishing production (including stock surveys)
- impacts to other ocean co-uses
- impacts to the ecological value of natural resources

An initial list of organizations or entities to consider for inclusion on the consortium are Washington Department of Ecology, Washington Department of Fish and Wildlife, Oregon Department of Fish and Wildlife, the University of Washington and other Washington-based academic research groups, Oregon

State University, Northwest Indian Fisheries Commission, Tribes, independent or nonprofit researchers and organizations, BOEM, National Labs, NOAA, NMFS, and DOD.

Tactical next steps and considerations: The Governor could put together a small informal work group of cabinet agencies and stakeholders to design and further develop a research consortium proposal and identify funding and capacity needs for the group's activities. Washington could set up a consortium to prioritize, review, and stimulate research through enabling state legislation and/or by requesting enabling federal legislation.

Capacity and funding needs: This proposal could require significant funding and capacity needs, however more research is needed to identify those needs.

Recommendation 3: Washington state should take an active role in determining and articulating its policy priorities relative to offshore wind development off the state coast prior to a BOEM process. To determine the state's policy priorities, the state could take multiple routes (gubernatorial action, legislative action, or policy articulation developed through a working group). Given the early nature of offshore wind discussion in Washington state, Gridworks recommends state form a new offshore wind planning and analysis task force led by the State Dept. of Ecology that includes representation of Washington state agencies including Dept. of Natural Resources, Dept. of Fish and Wildlife, Dept. of Commerce, EFSEC, and the Utilities and Transportation Commission as well as Tribal governments, Tribal-led organizations, local governments, interested federal agencies such as the Dept. of Defense, and representatives of impacted groups including the fishing and maritime industries, labor, conservation, and other impacted viewpoints.

The work of the state planning and analysis task force would inform decisions by the governor, the Legislature, and decision-making state agencies like Ecology on the state's policy priorities regarding offshore wind development off the Washington Coast and enable the state to represent those priorities in a BOEM process and other offshore wind leasing or siting efforts.

The state planning and analysis task force should consider and weigh the following issues and perspectives:

- How offshore wind resources off the Washington Coast could contribute to Washington's energy resource need,
- How offshore wind resources off the Washington Coast could contribute to regional or national energy resource need, and
- How development of offshore wind resources off the Washington Coast may impact existing ocean resources, use, and local communities and Tribes.

For example, to inform policy and value recommendations to send to the Governor, Legislature, or administrative agencies, the task force could:

- Examine up-to-date mapping of important marine industries, Tribal usual and accustomed fishing grounds, environmentally sensitive areas, military zones, and other areas;
- Overlay or otherwise compare these maps to developer proposals and other wind energy potential assessments;
- Discuss likely offshore wind project configurations or technology proposals with offshore wind developers at the table; and
- Estimate likely geospatial opportunities for offshore wind, potential impacts to existing co-uses, potential mitigation measures, and likely power routing, including any subsequent state or regional decarbonization potential as well as impacts to Washington electricity ratepayers.

Tactical next steps and considerations: The state will have important considerations to weigh in any planning and analysis efforts and articulation of policy priorities, beginning with when to explore such conversations. Ideally, the state's evaluation would be informed by additional scientific studies such as those mentioned in Recommendation 2. However, the research and modeling needed to understand these issues may take years to develop. State-level task force discussions will require additional cross-sector education about the various issues at play. The state could still undertake initial and early planning and analysis efforts to answer the above questions. For example:

- State-wide energy issues: Any offshore wind process would benefit from clearer articulation to coastal communities, local governments, coastal Tribes, ports, and others of the possible roles offshore wind resources could play in Washington's clean energy transition to inform their engagement in planning and analysis processes. However, current modeling analyses come to different results regarding when and at what point offshore wind sited off the Washington Coast would become cost competitive with other resources.⁸⁹ To prepare for the development of a state task force discussion or to support other gubernatorial or Legislative action, the Dept. of Commerce Energy Office could request that relevant energy planning processes examine the role offshore wind may play in meeting the energy goals of the state. Candidate planning processes include the NWPCC regional plan or the integrated resource planning of utilities with significant carbon emissions. Commerce and/or EFSEC could also help articulate transmission build-out scenarios for offshore wind power serving either Washington loads and/or customers of other states to inform state task force discussion of its impacts and opportunities. Discussion of build-out scenarios could also meaningfully inform a BOEM planning and analysis process: This information could enable, at least in part, the study of how offshore wind build-out would impact coastal communities, positively or negatively.
- Regional grid decarbonization: The state, Tribes, and Washington stakeholders would also benefit from a clear picture of whether or how Washington's offshore wind resource would contribute to larger grid decarbonization goals and/or support regional grid resilience and reliability. The West's trend towards regionalization in grid system operations and in energy market participation will be a key driver of Washington's energy position in the coming years.⁹⁰ However, this is a challenging dynamic for stakeholders and non-energy experts to understand. The state could support overall effective engagement in offshore wind planning and analysis by elucidating the benefits and opportunities of potential offshore wind resource buildout, not just to the state but also regionally. The Washington Dept. of Commerce and the UTC could be tasked with leading this discussion.
- Priorities for ocean use and resource management: The state, Tribes, and stakeholders would benefit from building on the work of the State Ocean Caucus, the Washington Coastal Marine Advisory Committee, the Marine Spatial Plan, and other policies and work products noted in this report to examine how offshore wind development could benefit or impact communities and current protected uses such as fishing and marine conservation, tribal usual and accustomed fishing areas, maritime shipping lanes, military and research zones, local port access, and local jobs.

Absent a more detailed understanding of how offshore wind could contribute to Washington's energy goals or benefit or impact the marine environment, communities, and Tribes, the state could still pursue development of a Washington Offshore Wind Road Map (see Recommendation 5) to detail responsible offshore wind development off the Washington Coast. Washington could also develop guidelines for BOEM to follow in BOEM's planning and analysis process (see Recommendations 6 and 7), including improved tribal and stakeholder engagement as well as process exit ramps.

⁸⁹ 2021 Washington State Energy Strategy, page 48; 2023 Washington Biennial Energy Report, May 22, 2023 page 18; E3 System Value of Offshore Wind in Washington, May 2023, page 30; Clean Energy Transition Institute [Net-Zero Northwest: Technical and Economic Pathways to 2050](#)

⁹⁰ 2023 Biennial Energy Report, May 22, 2023, page 19.

Capacity and funding needs:

- State capacity and funding: State funding and staffing for this effort could be minimal, particularly if aspects of this analysis and discussion are conducted through utility IRPs or the Northwest Power and Conservation Council. Discussions could also be comparable to other state efforts exploring Washington's priorities around emerging energy technologies, such as hydrogen ([Chapter 292, Laws of 2022](#)) and geothermal energy ([Chapter 350, Laws of 2024](#)).
- Tribal capacity and funding: Several tribal governments we spoke with indicated an interest in participating in these processes and a need for flexible, upfront grant funding to support their efforts. More discussion with Tribes would be needed to determine amounts and types of funding support.

Recommendation 4: While Tribes may elect to collaborate with a state's offshore wind policy task force (Recommendation 3), Gridworks also recommends the Governor's Office concurrently organize a separate offshore wind consultation leadership team including cabinet agency leadership from the Washington Dept. of Ecology, the Dept. of Commerce, and the Dept. of Fish and Wildlife to engage in on-going, iterative government-to-government consultations with the state government and governments of Washington's Coastal Tribes and other Tribes that may be impacted by offshore wind development. The consultations contemplated by this recommendation are expected to run parallel to the work of a state policy task force, allowing the results of government-to-government engagements to feed into and impact task force deliberations and outcomes. In the end, the purpose of these government-to-government engagements is to produce agreements on the protection and mutually beneficial stewardship of offshore lands and resources protected by Treaty rights, Executive Orders, and the state's legislative directives related to Tribes, the protection of cultural resources and practices, the creation of pathways for sharing information and costs to participate, the recognition of and respect for the rights of all sovereigns to assure the health, safety, and welfare of their citizens, and to streamline information exchange between the state and Tribes to inform any offshore renewable energy planning and evaluation efforts. This recommendation is separate from the pre-decisional government-to-government engagement we recommend BOEM undertake with Washington's Coastal Tribes and other Tribes that may be impacted by offshore wind development that is required through the U.S. federal government's trust responsibility to Tribes.

Tactical next steps and considerations: The Governor's Office, with assistance from other state agencies (Department of Ecology and Department of Fish and Wildlife) could immediately launch this effort.

Capacity and funding needs:

- State capacity and funding: Capacity and funding needs are likely limited to the staffing resources agencies would need to undertake this effort.
- Tribal capacity and funding: Several tribal governments we spoke with indicated an interest in participating in offshore wind processes and a need for flexible, upfront grant funding to support their efforts. More discussion with Tribes would be needed to determine amounts and types of funding support.

Recommendation 5: Washington State should develop a road map for responsible offshore wind development in order to encourage and elevate state priorities around responsible offshore wind development. Following the examples of Maine, California, and Oregon, the road map can articulate state priorities such as:

- realizing Washington economic development opportunities;
- recommendations for BOEM best management practices;
- additional data and research collection needed alongside or prior to project development;

- expectations for project community benefit agreements outlining assurances that local communities will benefit from offshore wind development;
- expectations for labor agreements outlining assurances that certain labor standards will be met during the life of the project;
- expectations for mitigation of various impacts; and
- outlines for the nature and impact thresholds of off-ramps to inform whether the state or federal government should halt consideration of offshore wind projects, among other topics.

The road map could provide a set of guidelines or it could act as an enforceable document, depending on the state's priorities. A road map effort could also develop additional work products, such as draft community benefit agreements or minimum requirements of what community benefit agreements should offer.

If the state engages in a federal leasing process, the road map could be useful in encouraging BOEM to include specialized lease provisions, such as bid credits for community benefit agreements, or best management practices in its leasing process. The road map could also inform off-ramps for the BOEM process from BOEM's planning and analysis phase through site assessments and project development. This road map could also be useful to developers in understanding how the state expects developers to interact with Tribes, communities, and important ocean-based industries in pursuit of offshore wind projects, such as engagement with affected communities and individuals in their planning and analysis processes prior to submitting a proposal to BOEM. The scope and detail of the road map would depend on the state's priorities relative to offshore wind, whether expressed through gubernatorial action or through legislative direction.

Tactical next steps and considerations: Through enabling state legislation sponsored by the governor or by executive action, the state could set up a working group composed of state agencies, Tribes, coastal communities, developers, local government, and representative stakeholders from the fishing community, the maritime industry, conservation, clean energy, labor, and other impacted voices to develop a road map, including provisions for community engagement in the development of the road map. The road map process and content could be modeled on ideas from Maine, California, and Oregon outlined in Appendix B.

Capacity and funding needs:

- **State capacity and funding:** Funding and staffing this effort could be comparable to or larger than other state efforts exploring Washington's priorities around emerging energy technologies.
- **Tribal capacity and funding:** Several Tribal governments we spoke with indicated an interest in participating in these processes and a need for flexible, upfront grant funding to support their efforts. More discussion with Tribes would be needed to determine amounts and types of funding support.

Recommendation 6: The state should develop advisory body requests for BOEM to meet in BOEM's consideration of offshore wind leasing off the Washington Coast, such as an intergovernmental task force or another body. The Gridworks team recognizes both the need to include Tribal and stakeholder perspectives in the design of this Washington-focused BOEM process and the fact that the BOEM process could kick-off absent a state invitation. BOEM has suggested it won't open federal waters off Washington Coast to leasing prior to a state invitation, however BOEM is the decision-maker tasked with federal leasing, and Washington should be prepared if BOEM's directives change.

All of the following options should be vetted and discussed with Tribes through government-to-government consultations as Gridworks has only been able to begin discussions with some Tribes on these issues, and further discussion is warranted. As a caveat to the recommendations below, it is clear

that Tribes are distinct from stakeholders due to their inherent sovereignty and treaty rights. Discussions with Tribes conducted to-date have indicated that Tribes would not view participation in a BOEM advisory body as a substitute for government-to-government consultations regarding treaty rights or BOEM's trust responsibilities. Therefore, these recommendation options should be considered as additional to state and federal government-to-government consultation.

R6-Option A: Washington State asks BOEM to establish an intergovernmental task force for consideration of Washington offshore wind through BOEM's authorities under the Federal Advisory Committee Act (FACA) exemption for "intergovernmental committees." Per restrictions on FACA-exempt committees, membership would be limited to Tribes, state, federal, and local governments, however Washington should require much stronger standards for public engagement (see Recommendation 7 for more detail below) in the BOEM process, such as guidance for public access to information and mandatory feedback from BOEM on issues stakeholders raise both in and outside of task force meetings. In this option, BOEM would manage the intergovernmental task force under an agreement with Washington ideally via a memorandum of understanding or another agreement that creates reasonable timelines for public involvement and accountability to stakeholders.

R6-Option B: Washington State asks BOEM to establish a new committee instead of an intergovernmental task force that would include stakeholders such as the fishing and maritime industries as well as state, federal, and Tribal decision-makers under the FACA provisions for groups established to advise a state government or through the FACA committee approval process. Washington state should define expectations for stakeholder and governmental engagement through an MOU or another agreement with BOEM (see Recommendation 7 guidelines below). As with the intergovernmental task force, this body would be designed to advise BOEM's activities for offshore wind leasing but would not be created as a decision-making body. It could improve the inclusivity of BOEM's advisory bodies by allowing voices to the table who are non-governmental representatives of industries like the fishing and maritime industries.

R6-Option C: Washington State requests BOEM form a traditional intergovernmental task force and, separately, either uses the Washington Coastal Marine Advisory Committee or establishes a new committee such as in Recommendation 3 to advise BOEM's Washington state agency task force members specifically on the offshore wind issues discussed in a BOEM intergovernmental task force. This state-led group runs parallel with a BOEM task force and is formed without expectations for BOEM leadership of the group. Instead, state agency staff on the BOEM task force carry recommendations informed by stakeholder feedback into a BOEM process/intergovernmental task force. Washington State would be responsible for stakeholder engagement and carrying back information to stakeholders. Washington State and BOEM establish an MOU or another agreement to outline procedural aspects.

Tactical next steps and considerations: The governor may request BOEM launch an advisory body to help BOEM plan for and evaluate offshore wind off the Washington Coast. This decision has many considerations to weigh, including: federal goals for offshore wind development and the readiness of Washington to pursue a leasing process in which BOEM is the decision-maker; whether continued evaluation of offshore wind off the Washington coast should be informed by existing science or whether additional studies are needed; BOEM's willingness to launch an advisory body absent specific federal goals for offshore wind development off the Washington coast; and BOEM's willingness to modify its advisory body and public engagement practices to suit Washington's needs, among other considerations.

Capacity and funding needs: Capacity and funding needs depend on options selected or other options the state deems available to pursue as well as the more specific guidelines for guiding any of these options suggested in Recommendation 7.

Recommendation 7: Washington State should develop specific guidelines, such as through an MOU or another agreement, to help guide BOEM's interaction with Tribes, stakeholders, and the public during a BOEM leasing process in Washington. While BOEM's task force/advisory body is an important aspect of BOEM's process, it is not the sole public engagement vehicle for BOEM's process, particularly as the intergovernmental task force has historically been limited to government representatives and federally recognized Tribes. Our intention in recommending the state pursue guidelines for BOEM to pursue would be to improve the BOEM process to be more meaningful, engaging, and transparent to Washington Tribes and stakeholder voices. Improvements Washington should pursue could also be applied to any state process examining offshore wind, including those that are state-led:

Procedural guidelines:

1. Washington state should encourage BOEM to develop a charter for its advisory body, whether it's an intergovernmental task force or another advisory body. Washington and BOEM should agree upfront on the terms of charter, representation, scopes of work, decision-making powers, public engagement functions, and how public comment will be taken and responded to during or around the advisory body meetings.
2. Washington state should encourage BOEM to increase its consultation efforts with Washington Tribes and share decision-making rationale with Tribes prior to public announcements. Washington should request BOEM engage in pre-decisional engagement with Washington Tribes prior to the launch of a BOEM process.
3. Washington state should encourage BOEM to share with the state, Tribes, and stakeholders a comprehensive and detailed process plan for any BOEM leasing effort off the Washington coast. The plan should include clear, and early identification of timelines, advisory bodies, decision-points, decision-makers, and decision-making criteria. Ideally, this plan would be developed using input from representatives of impacted groups, including state, local, and federal government, industry leadership, and Tribal representatives to assist with early notification and coordination of efforts. At minimum, the draft plan should be shared with the state, Tribes, and stakeholders for feedback and adjustments prior to finalization and implementation to ensure timelines and engagement methods work for impacted communities and stakeholders. For example, proposed timelines for engagement with the fishing community should not overlap with known dates the fishing community will be unavailable. Public comment opportunities should be scheduled at times and in locations physically accessible to the public.
4. Washington state should encourage BOEM to conduct an analysis of potential impacts of offshore wind development to coastal communities, the marine ecosystem West-wide, Tribes, and economic interests like fishing and shipping during the planning and analysis phase of the BOEM process. This analysis should include stakeholder, state, and Tribal input into drafting, and should be provided for public comment. This analysis should also be conducted prior to the identification of Wind Energy Areas and, ideally, prior to identification of Call Areas in order to inform and deconflict designation of those areas. Washington could encourage BOEM to include straw proposals or modeling assumptions, such as those found in the PNNL West Coast Offshore Wind Transmission Study or informed by Washington state, where key information from developers to inform impacts is not yet available.

Transparency, inclusivity, trust, and meaningful engagement guidelines

5. Before any BOEM planning and analysis process kicks off, Washington state should encourage BOEM to reach out to Tribes, communities, and impacted stakeholders to share and exchange

information, understand the network of impacts and interested parties, and begin building relationships and trust. This could be accomplished in partnership with local governments who know their communities and preferences for engagement.

6. Washington state should encourage BOEM to provide time and funding for key BOEM staff to spend time in the community with affected communities and Tribal members to understand how they live and work in the coastal environment and how offshore wind may impact their communities. This could occur through an increase of staff capacity (number of FTEs) physically stationed in Washington State, ideally near coastal communities.
7. Washington state should encourage BOEM to share BOEM's criteria for decision-making and the reasoning supporting BOEM's decisions, such as any footprint changes to wind energy areas between drafts or reiterations of planning areas between drafts and how those footprints are driven by data modeling or other considerations. The state should encourage BOEM to explain how Tribal and stakeholder input was taken into account in decision-making and how it shaped decision-making, if at all.
8. Washington state should encourage BOEM to share drafts of Call Areas and additional drafts of Wind Energy Areas to inform the public and stakeholders of any changes made responding to conflicts with shipping lanes, Department of Defense areas, sensitive marine areas, etc.
9. Washington state should encourage BOEM to identify task force or advisory body members or staff to act as points of contact for Tribes and affected communities and stakeholders to help channel their concerns into the decision-making process.
10. Washington state should encourage BOEM's public meeting efforts to provide clear and scoped agendas with sufficient time to cover the complexity of the planned discussion to enable stakeholders to focus their time and efforts.
11. Washington state should encourage BOEM to commit to responding to issues or ideas raised by stakeholders and clearly communicate how and when it will respond to those issues and with which topical experts.
12. Washington state should encourage BOEM to lengthen oral public comment opportunities to provide an individual stakeholder enough time to address the complex issue of offshore wind. Forms and durations of public comment opportunities, whether written or oral, should be made clear in advance of any public meetings as well as how they will be captured in records of decision-making.
13. Washington state should encourage BOEM to place task force public comment opportunities earlier in a meeting or at times convenient for the public so that important stakeholder voices can be included in the BOEM record of decision-making.
14. Washington state should encourage BOEM to commit to one-on-one meetings with Tribal, community, and stakeholder experts.
15. Washington state should encourage BOEM to include facilitators at its meetings and locate meetings in affected communities.
16. Washington state should encourage BOEM advisory body staff to be available before, during, and after advisory body meetings to engage with the public. Open house and fair-style public meetings with topical tables staffed with BOEM employees can be effective at answering public questions and creating a dialogue.

Tactical next steps and considerations: Next steps pursuing these options are largely dependent on any decisions made regarding Recommendation 6, however elements of these guidelines could also be used to set up any state-led working groups such as those in Recommendations 2, 3, 4, and 5.

Capacity and funding needs: Capacity and funding needs are largely dependent on which of these actions the state chooses to pursue or recommend BOEM pursue.

APPENDIX A: COMPILATION OF REPORTS AND STUDIES ON OFFSHORE WIND AND OFFSHORE WIND LEASING PROCESSES FROM STATE AND FEDERAL JURISDICTIONS

Oregon

[Oregon's Floating Offshore Wind Study](#)

[Oregon Territorial Sea Plan Part Five: Marine renewable energy development](#)

California

[California AB 525 Reports:](#)

- Outreach
 - [California Tribal Outreach](#)
 - [California Fishers outreach](#)
- AB 525 Interim Reports and Consultant Reports
 - [Offshore Wind Energy Development off the California Coast Maximum Feasible Capacity and Megawatt Planning Goals for 2030 and 2045](#)
 - [Preliminary Assessment of the Economic Benefits of Offshore Wind Related to Seaport Investments and Workforce Development Needs and Standards](#)
 - [AB 525 Offshore Wind Energy Permitting Roadmap - Final Report](#)
 - [Analytical Guidance and Benefits Assessment for AB 525 Strategic Plan Seaport and Workforce Development for Floating Offshore Wind in California](#)
 - [OSW Transmission Technologies Assessment](#)
 - [California State Lands Commission AB 525 Port readiness Plan - Final Report](#)
 - [California State Lands Commission AB 525 Workforce Development Readiness Plan - Final Report](#)
 - [Northern California and Southern Oregon Offshore Wind Transmission Study, Volume 1](#)
 - [Northern California and Southern Oregon Offshore Wind Transmission Study, Volume 2 - Appendices](#)
- Draft AB 525 Strategic Plan
 - [Notice of Availability: Assembly Bill 525 Draft Strategic Plan for Offshore Wind Development](#)
 - [Volume I: Overview of AB 525 Strategic Plan](#)
 - [Volume II: AB 525 Plan](#)
 - [Volume III: Appendices for AB 525 Strategic Plan](#)

[Research and Development opportunities for Offshore Wind Energy in California, CEC.](#)

[An Assessment of the Cumulative Impacts of Floating Offshore Wind Farms, California Ocean Protection Council](#)

Maine

[The Offshore Wind Roadmap: Charting a Course for Maine](#)

Washington

Washington Coastal Marine Advisory Council 2022 Offshore Wind Recommended Principles of Engagement, final 01.10.2023

[The Marine Spatial Plan for Washington's Pacific Coast](#) (2017) relevant chapters and Chapter 4 management recommendations

[HB 2341](#), research needs affecting the Olympic Coast National Marine Sanctuary Advisory Council.

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APPENDIX B: PROCESS CASE STUDIES BY STATE: OREGON, MAINE, AND CALIFORNIA

As part of our initial research for the Washington Offshore Wind Engagement Project, Gridworks conducted research into offshore wind planning and evaluation processes in other states. Our review was scoped to the states of Oregon, Maine, and California and relies on review of public BOEM process materials and interviews with participants from impacted stakeholders and communities in those processes.

We present case studies on stakeholder experiences of these processes in Oregon, Maine, and California, and stakeholder observations of BOEM and state engagement with Tribal nations. These stakeholder experiences are drawn from direct interviews with a small cross section of state agency representatives and process participants that took place between January and April 2024, as well as public documents reviewed during the same time period. Our timeline did not allow for and Gridworks did not attempt to engage with all state agency representatives in a process; instead, we prioritized our available time for interviewing participants in offshore wind processes. Our ability to conduct interviews was limited by time and by participants' willingness to engage with us.

In Oregon, Gridworks interviewed four local coastal conservation representatives, three fishing industry representatives, and two state government representatives. In Maine, Gridworks interviewed three fishing industry representatives, one state government representative, one developer, one labor representative, one conservation representative, one fisheries management representative, and one Maine tribal member professionally involved in the Maine tribal interests. In California, Gridworks relied more heavily on the documents produced from the OSW leasing process and through state studies including those directed by legislation. Gridworks also interviewed one person from state government, two fishing representatives, and one person from local coastal government.

We offer these perspectives as a snapshot of offshore wind processes in other states, rather than a holistic account of those processes.

Oregon

Background. Prior to the BOEM process for considering offshore wind leasing sites off the Oregon coast, BOEM examined a request filed in 2012 to deploy a wave energy test facility in federal waters off the central Oregon coast in a process that was widely panned by the Oregon stakeholders Gridworks interviewed. Stakeholders felt that this previous effort left coastal communities with negative feelings toward ocean energy projects and the federal public process associated with them. Other stakeholders reported losing trust in BOEM, developers, and the sincerity of the BOEM public engagement process.

The wave energy process was followed in 2013 by [an unsolicited lease proposal](#) for the Wind Float Pacific Demonstration Project by Trident Wind that proposed a relatively small footprint. After several years of public engagement in the 2014-2016 timeframe, BOEM determined that Trident no longer retained its non-competitive status.⁹¹ Subsequently, BOEM released a three-part call area that was much larger than the potential lease footprint that had been discussed in the context of the unsolicited bid. BOEM did not engage stakeholders on the size of the call area in advance of issuing the call areas, surprising and frustrating stakeholders.

In 2019, BOEM revived the operation of the BOEM Oregon Intergovernmental Task Force (Oregon task force) that includes representatives from cities, counties, states, Tribes, and federal agencies.⁹² From

⁹¹ On May 14, 2013, Principle Power Inc. submitted an [unsolicited lease request](#). BOEM determined Principle Power Offshore Wind Pilot project no longer retained its non-competitive interest status.

⁹² BOEM stood the task force up in 2011 and had previously addressed Principle Power's Offshore Wind unsolicited lease request. The task force currently consists of two cities, two ports, seven counties, four Tribes (including the Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians), 12 state agencies, and 21 federal agencies. Not all of the named entities have a participating representative. In December 2010, Governor Theodore Kulongoski requested the establishment of a state-federal task force. The Governor designated the [Oregon Department of Land Conservation and Development \(DLCD\) Coastal Management Program \(OCMP\)](#) as the state agency lead to coordinate with BOEM.

2019 to 2023, the task force held one meeting per year to coordinate and consult among governments and government agencies.⁹³

After each task force meeting was officially adjourned, the public was allowed to make three-minute public comments or ask questions through the virtual meeting platform's chat function.⁹⁴ The public comment periods after task force meetings did not provide opportunities for verbal dialogue with task force members, though they did initiate one-on-one conversation between the public, BOEM staff, state and local governmental staff, and other officials participating in the process. Written public comments were solicited in advance of the 2021 and 2022 Oregon task force meetings.⁹⁵

In advance of the most recent Oregon task force meeting in September 2023, BOEM released its draft Wind Energy Area (WEA) and a notice of opportunity to comment.⁹⁶ On February 13, 2024, BOEM issued its final WEA. No task force meetings were held between the issuance of the draft WEA and the issuance of the final WEA. BOEM issued its notice of intent to prepare an Environmental Assessment for Wind Leasing and Site Assessment on February 14, 2024, with a 30-day comment period.⁹⁷ Gridworks could not find evidence demonstrating that BOEM and Oregon provided any participation assistance funding for interested persons during the task force process or associated public meeting and public comment opportunities.

Separately, as directed by Oregon HB 3375, the Oregon Department of Energy led a public engagement process as it developed its *Oregon Floating Offshore Wind Study*.⁹⁸ The legislation directed the Oregon Department of Energy to examine the benefits and challenges of adding 3 GW of floating offshore wind off the Oregon coast including reporting on the effects on "reliability, state renewable energy goals, jobs, equity, and resilience."⁹⁹ The legislation required ODOE to conduct a literature review and public engagement process for development of the study.¹⁰⁰

The formal public engagement for the *Oregon Floating Offshore Wind Study* consisted of a kick-off meeting and three meetings located along the Oregon coast, often piggy-backing on the same day as other floating offshore wind public meetings (such as those for BOEM). Importantly, ODOE conducted many one-on-one and small group meetings with representatives of the impacted communities to collect perspectives on what floating offshore wind meant to them. Almost all Oregon stakeholders interviewed by Gridworks praised the ODOE engagement process. The stakeholders appreciated the constant availability of ODOE staff to listen and engage in a dialogue and the balanced nature and inclusiveness of diverse perspectives of the report on such a controversial subject.

⁹³ No other working groups were established as part of the BOEM process to engage interested persons. BOEM Oregon Intergovernmental Renewable Energy Task Force meeting, slide 3, September 18, 2023. The BOEM staff available at the September 18, 2023, meeting included the regional director, supervisor, and section chief, Tribal liaison, and personnel with expertise in areas of environmental, marine and GIS.

⁹⁴ Several of the task force meetings were conducted during the COVID pandemic.

⁹⁵ [BOEM 2021 Task Force Meeting Nine](#); Oregon Department of Land Conservation and Development and BOEM.

⁹⁶ Issuing a draft WEA is an additional step BOEM added in the last several years as a result of their experience with stakeholders.

⁹⁷ Notice of Intent to Prepare an Environmental Assessment for Commercial Wind Leasing and Site Assessment Activities on the U.S. Outer Continental Shelf Offshore Oregon, <https://www.federalregister.gov/documents/2024/02/14/2024-02985/notice-of-intent-to-prepare-an-environmental-assessment-for-commercial-wind-leasing-and-site>

⁹⁸ <https://www.oregon.gov/energy/energy-oregon/Pages/fosw.aspx>

⁹⁹ Floating Offshore Wind: Benefits & Challenges for Oregon, Sept. 15, 2022, page 2.

¹⁰⁰ Floating Offshore Wind: Benefits & Challenges for Oregon, Sept. 15, 2022, page 3-4. From the literature review ODOE developed the following questions for stakeholder discussions for Oregon FOSW: 100 Percent Clean Energy Targets, Economic Development, Equity, Reliability and Resilience for Coastal, State, and Regional Power Systems, Siting and Permitting (Focused on Potential Impacts to Ocean Users and Environment), Technologies and Costs, Port Infrastructure and Sea Vessels, Transmission Infrastructure, Offtakers and Energy Markets.

Engagement plan and process. BOEM in conjunction with Oregon's Department of Land Conservation and Development Coastal Management Program (Oregon DLCD; designated lead offshore wind agency for Oregon and BOEM engagement) developed an Oregon-specific data gathering and engagement plan for BOEM's offshore wind efforts, published October 2020.¹⁰¹ The purpose of the plan was to identify how to "engage with research organizations and potentially interested and affected parties to gather data and information to inform potential offshore wind energy areas and leasing decisions offshore Oregon."¹⁰² The plan outlined an approach and specific considerations for different categories of stakeholders. For instance, for engaging the fishing industry BOEM should avoid fishing seasons and focus on one-on-one small meetings.¹⁰³ For coastal communities, BOEM should communicate the purpose of the data and information gathering, be transparent about how the data and information was used, reach out to organizations in the community first to disseminate information and then hold public meetings in the communities or close by.¹⁰⁴

In January 2022, BOEM issued its *Data Gathering and Engagement Summary Report on Oregon Offshore Wind Energy Planning*, summarizing its activities.¹⁰⁵ Per the report, between October 2020 through September 2021, BOEM and the state participated in 37 meetings and briefings with various coastal community groups and another 31 meetings with ocean users from February 2021 and December 2021, all outside of the roughly annual task force meetings.¹⁰⁶ Engaged groups included fishing industry associations, ports, conservation groups, and ocean- and marine-related commissions and committees.¹⁰⁷ The general purpose of the engagement was to explain BOEM's work on determining Wind Energy Areas and gather input on the same from stakeholders with diverse interests, perspectives and expertise that ranged from issues of marine environmental science writ large and specific fisheries to supply chain infrastructure and impacts. The information, data, and feedback on BOEM's work would be used to help BOEM determine the WEA. BOEM and Oregon DLCD also made several presentations at public meetings held as part of ODOE's separate work to write an *Oregon Energy Floating Offshore Wind Study*, and provided process updates to coastal cities and counties.¹⁰⁸

Later, as part of its public engagement process to designate wind energy areas off the Oregon Coast, BOEM held three 4-hour in-person public open house meetings in September 2023 at which BOEM took public comment regarding designation of wind energy areas limited to 3-minutes per participant.¹⁰⁹ However, BOEM did not provide for the oral public comment to be entered into BOEM's official record, and did not capture transcripts or recordings of the oral comments. Instead, public comments for BOEM's official record could be submitted by typing into computers at stations scattered throughout the meeting space or by filling out comment cards by hand. The public open houses also included information tables organized by subject matter and staffed by BOEM representatives to give the public an opportunity to talk with BOEM staff.

Tribal engagement. As part of its data gathering and engagement plan, BOEM and Oregon DLCD detailed their efforts on Tribal engagement, noting: "The State will participate fully with BOEM in Tribal engagement when amenable to the Tribe; joint engagement is preferable to foster intergovernmental relationship-building and coordination."¹¹⁰

¹⁰¹ [Data Gathering and Engagement Plan for Offshore Wind Energy in Oregon](#). In December 2010, Governor Theodore Kulongoski designated the Oregon Department of Land Conservation and Development (DLCD) Coastal Management Program (OCMP) as the State agency led to coordinate with BOEM. BOEM hired Kerns and West to prepare the engagement plan.

¹⁰² BOEM's Data Gathering and Engagement Plan for Offshore Wind Energy in Oregon, page 6.

¹⁰³ BOEM's Data Gathering and Engagement Plan for Offshore Wind Energy in Oregon, page 20.

¹⁰⁴ BOEM's Data Gathering and Engagement Plan for Offshore Wind Energy in Oregon, page 21

¹⁰⁵ BOEM: [Data Gathering and Engagement Summary Report: Oregon Offshore Wind Energy Planning](#)

¹⁰⁶ [Data Gathering and Engagement Summary Report](#), Page 19 and 22.

¹⁰⁷ [Data Gathering and Engagement Summary Report](#), see page 22-25 and

¹⁰⁸ <https://www.boem.gov/renewable-energy/state-activities/oregon/boem-and-state-oregon-participation-standing-meetings>

¹⁰⁹ <https://www.boem.gov/renewable-energy/state-activities/Oregon>

¹¹⁰ BOEM's Data Gathering and Engagement Plan for Offshore Wind Energy in Oregon, page 22.

In that plan, BOEM also initially stated that it does not consider the engagement and data gathering described in the plan “to constitute an action that may have substantial direct effects on one or more Tribes” and “thus does not intend to initiate government-to-government consultation with Tribes at this pre-planning stage of offshore wind in Oregon.”¹¹¹ However, BOEM stated that it “will give close and respectful consideration to any opinions a Tribe expresses about whether the engagement and data gathering has Tribal implications and the reasons given in support, in addition to requests for consultation.”¹¹² BOEM stated that this approach is consistent with Federal Department of Interior policy on consultation with Tribes and BOEM Tribal consultation guidance.¹¹³

In February 2021, BOEM changed course and conveyed in a formal letter an invitation to the nine federally recognized Tribes in Oregon to engage in government-to-government consultation or pre-consultation informational discussions at their choosing, and asked their preferences regarding a tri-lateral dialog with Oregon Department of Land Conservation and Development participation.¹¹⁴ In May of 2021, BOEM additionally invited engagement via formal letter to two federally recognized Tribes currently located in California with ancestral lands in Oregon.¹¹⁵

BOEM’s subsequent data gathering and engagement report summarizes the engagement activities and topics discussed with Tribes and their feedback at a very high level.^{116,117} BOEM had three meetings with Tribes and Tribal councils and organizations from June 2020 through December 2021.¹¹⁸

Data gathering. Outside its Oregon offshore wind WEA-designation process, BOEM has funded studies of seabirds, leatherback sea turtles, seafloor habitat, blank brant, whales, and other marine elements to support a better understanding of the marine environment where offshore wind leases may be issued.¹¹⁹ The studies themselves were almost exclusively conducted by other agencies and organizations with expertise on the topics.

During BOEM’s consideration of wind energy areas, Oregon did not initiate new state-led or -funded committees or work groups to gather data on the impacts of offshore wind development. Oregon designated the Oregon Department of Land Conservation (DLCD) as the lead state agency for offshore wind, and DLCD worked with BOEM to engage existing institutions and stakeholders to gather existing data and research. Other Oregon agencies contributed to the state/BOEM processes under their own direction, filing individual agency comments without the benefit of a single state organization coordinating those efforts.

Key takeaways from Oregon to inform a Washington process:

Lessons learned about the BOEM task force structure

- Task forces are only one aspect of a BOEM process, which also includes public comment periods and other types of stakeholder meetings. Given the limited types of participants who can sit on a task force and the limited window for public comments at task force meetings, the state and BOEM should consider additional types of engagement meetings that allow for two-way dialogue, relationship building and trust building with and between communities and

¹¹¹ BOEM’s Data Gathering and Engagement Plan for Offshore Wind Energy in Oregon, page 22.

¹¹² BOEM’s Data Gathering and Engagement Plan for Offshore Wind Energy in Oregon, page 22-23. BOEM states that its “approach is consistent with DOI policy on consultation with Indian Tribes and BOEM Tribal consultation guidance.”

¹¹³ Additional information on [BOEM’s Tribal consultation and engagement policy](#) is available online.

¹¹⁴ [Data Gathering and Engagement Summary Report](#) Oregon Offshore Wind Energy Planning, January 2022, page 28.

¹¹⁵ The Elk Valley Rancheria and the Tolowa Dee-ni’ Nation. BOEM’s Data Gathering and Engagement Summary Report, Page 29.

¹¹⁶ [Data Gathering and Engagement Report OR OSW Energy Planning January 2022 \(boem.gov\)](#), page 28-32.

¹¹⁷ [Data Gathering and Engagement Summary Report](#), Page 28-32.

¹¹⁸ [Data Gathering and Engagement Summary Report](#), Page 2.

¹¹⁹ [Selected BOEM-Funded Research Informing Renewable Energy Offshore Oregon](#), August 2023.

stakeholders as well as opportunities for two-way dialogue and education between decision-makers, task force members, stakeholders, and Tribes.

Lessons learned about data gathering and education

- Early public education on the BOEM process and offshore wind technologies and impacts is essential to meaningful engagement, but education must be provided by trusted third-parties and not focus too heavily on industry perspective. If agencies don't discuss and provide information about the concerns stakeholders raise, the public may fill in the gaps with information that is not necessarily accurate.
- Science is a key element of stakeholder trust. Decision-makers should lean on the science-based organizations that produce studies and that provided direct input to the BOEM process. Stakeholders and Tribes share that they need more science to understand the impacts of offshore wind on communities and the marine environment, particularly beyond the Call Areas.
- The University of Washington and other Washington-based or Pacific Northwest-based scientific institutions could be a great resource for Washington to leverage for additional science-based study work.
- To utilize available science and to develop more, Washington and BOEM could coordinate early in a process, such as prior to Call Area issuance, with fisheries and marine science agencies such as NOAA and National Marine Fisheries Service. Early coordination with these agencies, even before processes officially kick off, would provide longer-lead times for federal agencies like NOAA to gather information needed to inform decision-making in a BOEM process. This could be helpful for other agencies responding to a federal leasing effort about potential siting conflicts, such as the Department of Defense.
- Many stakeholders and Tribes believe a programmatic environmental impact statement (PEIS) and a cumulative impact study is necessary to determine Wind Energy Areas, despite BOEM's argument that a PEIS cannot be done without a site evaluation and offshore wind facilities design.¹²⁰ It is likely that studies getting to the heart of stakeholder requests for something like a PEIS or cumulative impact analysis can be done prior to lease issuance, however more discussion between BOEM, stakeholders, Tribes, and researchers is needed to uncover what is possible and what isn't possible.
- Many stakeholders and Tribes will likely be unsatisfied without a comprehensive look at the offshore wind entire leasing program on the West Coast to understand cumulative impacts on the California Current Large Marine Ecosystem. As an example, a stakeholder pointed out that Pacific whiting larvae transport in California is critical to the whitening fish population of northwest Washington.

Lessons learned about public engagement

- Processes can be successful if they are accessible to the people and organizations they hope to engage. For example, mid-morning meetings for crabbers who are out all night are not accessible meetings. Processes can also be successful if they scope their public engagement broadly, including all potential constituencies in initial engagement. For Washington, initial engagement should include all coastal Tribes, coastal governments, coastal communities, and representatives of all coastal economies and interests, including fishing, conservation, tourism, and more.
- Processes can be considered meaningfully engaging when decision-makers socialize with communities and among stakeholders and support socialization of the community itself on offshore wind issues, especially between those with different views and perspectives. During remote meetings, participants would appreciate the ability to communicate with each other via the chat or to at least see each other on video camera.
- Hosting information tables organized by subject matter that give the public an opportunity to talk with BOEM staff and provided the public a dialogue with decision-makers can be helpful.
- Public comments should be well documented, and those methods of documentation should be clearly communicated in advance of meetings and other opportunities.
- The use of third-party facilitators to run meetings can be helpful and increase notions of a process's transparency and accessibility.

¹²⁰ A site evaluation involves activities such as taking samples of and assessing the geography of the ocean floor in the WEA as well as other studies.

- A decision-maker's choice to spend time engaging with Tribes and stakeholders in one-on-one meetings, rather than only through task force meetings or other public meetings, can contribute to successful outcomes.

Lessons learned about transparency

- Processes can be considered untransparent when stakeholders believe that decision-makers have predetermined eventual outcomes. Many stakeholders believe that the federal administration's directive about the amount of offshore wind it hopes to develop leaves little room for offshore wind not to be developed, even if a state determines it's not a good fit for the state's energy goals or community priorities.
- Process participants may be willing to participate in a process that is trying to work toward offshore wind leasing so long as the process holds open a no-go option, or exit ramp, i.e., the possibility of terminating an offshore wind evaluation and leasing process as more information is discovered during the process.
- Stakeholders would like to hear more about how decision-makers are making choices, such as by releasing draft ideas on how to change Wind Energy Areas prior to releasing new drafts and explaining how decisions are made as well as the criteria considered in making those decisions.

Lessons learned about Tribal engagement

- Tribes should be consulted well before a planning and evaluation process kicks off to understand and begin addressing Tribal concerns, interests, and priorities.¹²¹

Lessons learned about state leadership

- States should provide leadership in a planning and evaluation process, such as by gathering and organizing state input into the process early, addressing questions about offshore wind, including how offshore wind contributes to the state's energy goals, likely onshore transmission needs and impacts, economic or marine impact issues, and any guidelines the state has relative to responsible offshore wind development.

Maine

Background. Maine has a long history of working towards an offshore wind industry. Some of the earliest work began in the early 2000s through 2014 with research and demonstration project development conducted by the University of Maine (UMaine),¹²² which proposed deployment of one-eighth scale offshore wind platforms and towers to be located in lobster and other fisheries grounds in state waters.

As UMaine promoted its technology and test facility, some constituents in the fishing industry were initially disappointed in UMaine's execution of its public engagement process. Over time participants felt the public engagement process improved as UMaine added facilitation and outreach capacity to its efforts, but the awkward start hampered some stakeholders' trust in the state's process for considering offshore wind. Though UMaine described its proposal for the demonstration project well, its engagement process did not address fishing industry and stakeholder concerns about impacts to fisheries and the marine environment. The fisheries industry eventually relented to the deployment of test facilities for the study of offshore wind based on the limited scale of the proposal.

This early process continues to shadow stakeholder perceptions of offshore wind development in Maine through the present day. In November 2020, after a long hiatus on public engagement around the UMaine offshore wind research project, the state of Maine announced support for a proposed full-scale

¹²¹ Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians, February 13, 2024 press release, [Tribe disappointed with wind energy decision citing failure of boem to honor its obligations to tribe and impacts to fisheries, cultural resources, and heritage](#).

¹²² UMaine received its biggest grant in 2010. [UMaine Receives \\$12.4 Million for Deepwater Offshore Wind Research Facility - UMaine News - University of Maine](#).

array of up to 12 offshore wind platforms in federal waters in prime Maine fishing areas.¹²³ This announcement came without any advanced communication with the fishing industry.

The lack of prior public engagement divided communities over offshore wind's future in the state. The lobsterman's willingness to share fisheries data declined. The fishing industry and others felt they had participated in the earlier discussion of offshore wind in good faith, only to have decisions made without engagement. They felt their trust had been broken.¹²⁴

The state's announcement of its support of a full-scale offshore wind project also occurred at the infancy of a separate effort to develop an offshore road map for Maine.

In 2020, the state of Maine received a \$2.1 million grant to develop a plan, or road map for Maine offshore wind.^{125,126} The road map was part of a strategy to meet Maine's climate and clean energy goals,¹²⁷ and was led from the Governor's Office.¹²⁸ The goals of the roadmap were much broader than the narrow question in the BOEM leasing process, which was focused on establishing WEAs. The road map had three primary objectives: 1) Pursue Offshore Wind Supply Chain, Infrastructure, and Workforce Investments to Support Economic Growth and Resiliency, 2) Harness Abundant Renewable Energy to Reduce Long-Term Costs, Reliance on Fossil Fuels, and Fight Climate Change, 3) Advance Maine-Based Innovation to Compete in Emerging National and Global Offshore Wind Industry.

The roadmap process operated separately and independently from the BOEM process and included an advisory committee of 24 members and four working groups. The four working groups included: Energy Markets and Strategies; Supply Chain, Workforce, Ports and Marine Transportation; Fisheries; and Environment and Wildlife. The working groups focused on energy markets, ports and infrastructure, socioeconomic impacts, equity, manufacturing and supply chains, workforce development, and fisheries and environmental compatibility. They included state, city, port and federal agency representatives, conservation and preservation NGOs, private fishing interests, and supply chain industry and labor representatives.¹²⁹

The entire road map effort is reported to have had over 78 public engagement meetings up and down the coast of Maine in order for the road map process to hear from a diverse set of stakeholders and collect existing scientific studies to inform the road map.

¹²³ The governor's energy office proceeded to conduct more than a dozen public meetings with stakeholders over a nine-month period and dozens of one-on-one meetings with interested stakeholders, fishermen, and federal agencies. [On October 1, 2021, the State of Maine submitted a research lease application](#) to BOEM for a floating research array of up to 12 turbines and 144 MW capacity in federal waters.

¹²⁴ The alienation was aggravated by the involvement of an unfamiliar international development company. In the intervening two years prior to the announcement of the full array, the university had licensed its technology to a development company. When the state made its announcement, rather than the public hearing that the University of Maine, a familiar institution, was going to deploy offshore wind in state waters, the affected communities were confronted by the involvement of an unfamiliar international development company.

¹²⁵ Conservation interests strongly supported the securing of the grant and the creation of a road map as a positive state-direct examination of offshore wind for Maine. They believe the road map processes increased the state's ability to secure funding for additional marine impact studies of offshore wind. Labor interests advocated for the leveraging of Maine-based jobs and improving the quality and compensation of the jobs from offshore wind. They cite the beginning of a port development project as an example of the positive outcomes of the road map process.

¹²⁶ Development of the Maine Offshore Wind Road Map was funded by a \$2.166 million grant from the U.S. Economic Development Administration.

¹²⁷ Maine's statutory climate and clean energy targets: "Using 80 percent renewable energy by 2030 with an intention of 100 percent by 2040, cutting emissions by 45 percent by 2030 and 80 percent by 2050, achieving carbon neutrality as a state by 2045, and doubling our clean energy jobs to 30,000 by 2030."

¹²⁸ See [Maine Offshore Wind Road Map, February 2023](#).

¹²⁹ For a complete list, see Maine Offshore Wind Road Map, February 2023. https://www.maine.gov/energy/sites/maine.gov/energy/files/inline-files/Maine_Offshore_Wind_Roadmap_February_2023.pdf page 18 and 19.

Through legislation that grew out of the road map process, Maine established the Maine Offshore Wind Research Consortium.¹³⁰ The Consortium is directed out of the Maine Governor's Office and is responsible for establishing a research strategy for offshore wind and minimizing its impact.¹³¹ The Consortium steering committee consists of five members.¹³² The Consortium advisory committee has 25 members.¹³³ The Consortium created four working groups.¹³⁴

Somewhat in parallel to the Maine road map process, on January 2, 2019, Governor Sununu of New Hampshire requested BOEM create an intergovernmental renewable energy task force for the state of New Hampshire. BOEM subsequently established the Gulf of Maine Intergovernmental Renewable Energy Task Force (task force) that included New Hampshire, Maine, and Massachusetts. In contrast to the state efforts like the Maine Offshore Wind Road Map and consortium that included a wide variety of public, private, tribal and NGO members, the BOEM task force membership consisted only of state and federal agency and tribal representatives from the three new England states.

Many of the formal and informal participants in the Map roadmap process were also participants in the BOEM's leasing efforts and were thus able to cross-pollinate the processes, though Gridworks cannot find evidence of an intentional effort to directly link the processes beyond periodic meeting updates from BOEM in the road map effort. That said, the road map was developed between 2020 and early 2023, a time during which the BOEM Gulf of Maine leasing process slowed.

BOEM process. The purpose of the BOEM's planning and evaluation process in the Gulf of Maine was to issue leases for offshore wind sites, if appropriate. That process included an intergovernmental task force, open public meetings, engagement with stakeholders and Tribes in one-on-one meetings, and consultation with agencies with expertise on issues relevant to potential offshore wind impacts. The Gulf of Maine task force has approximately 194 members.¹³⁵ The task force held three meetings from December of 2019 through May of 2023 that the public could watch live.¹³⁶ The Maine governor's office made presentations to the task force explaining the work of the roadmap initiative. Short summaries of the task force meetings were provided, and video recordings of the task force meetings were made available online. The public was not allowed to comment or participate in the task force meetings, but public comment opportunities were made available outside of official meetings.¹³⁷

Stakeholders we interviewed shared that BOEM also conducted many one-on-one working meetings with stakeholders and Tribes in Maine outside of the task force process. BOEM often took stakeholder or Tribal input from these meetings, considered the input, and came back to meet with participants to discuss the input further. Multiple stakeholders praised BOEM's willingness to engage in ongoing dialogue with stakeholders on issues at a granular level. Stakeholders also felt that BOEM's WEA footprint decisions were influenced and affected by BOEM's engagement through these small

¹³⁰ S.P. 512 - L.D. 1619.

¹³¹ [Per Maine's initiatives website](#), the strategy includes: Opportunities and challenges caused by the deployment of floating offshore wind projects to the existing uses of the Gulf of Maine; methods to avoid and minimize the impact of floating offshore wind projects on ecosystems and existing uses of the Gulf of Maine; and ways to realize cost efficiencies in the commercialization of floating offshore wind projects.

¹³² Carl Wilson, Department of Marine Resources, John Perry, Department of Inland Fisheries and Wildlife, Stephanie Watson, Governor's Energy Office, Alison Bates, Colby College, Terry Alexander, F/V Jocka.

¹³³ Membership classes include Commercial and recreational harvesting interests, scientists from private and public research institutions, offshore wind industry experience, coastal community representatives, Maine-based environmental groups, state agencies and at-large members.

¹³⁴ The four working groups included: Energy Markets and Strategies; Supply Chain, Workforce, Ports and Marine Transportation; Fisheries; and Environment and Wildlife.

¹³⁵ Membership numbers as of May, 2023, [from BOEM website](#).

¹³⁶ The meets were held in Durham, New Hampshire, one virtually (due to the COVID pandemic), and Bangor, ME. The BOEM process took a slight hiatus as Maine developed its road map. Very short summaries of the task force meetings were provided by the private facilitator, for an example [see here](#).

¹³⁷ The first task force meeting held public comments after the end of the task force meeting. The second two task force meetings paused the task force meeting during the day to allow the two public comment opportunities to occur during the day long task force meeting rather than afterward.

stakeholder meetings and the information the stakeholders provided BOEM, however it is unclear how information from these small meetings flowed back into task force discussions.

Stakeholders we interviewed also shared that BOEM did a good job consulting with Tribes located in Maine, engaging Tribes as nations and building close working relationships to understand their perspectives and interests.

BOEM issued its Gulf of Maine draft wind energy areas in October 2023 with a total projected capacity of 40 gigawatts.¹³⁸ Thanks in part to state and federal delegation leadership, these areas excluded major fishing areas from development as Maine's lobstering industry had hoped.¹³⁹ After BOEM released its draft call and wind energy areas, it conducted three in-person general public meetings¹⁴⁰ to discuss the draft areas, six virtual meetings on specific topics, and one meeting with Gulf of Maine Tribal Nations.¹⁴¹ BOEM provided an approximately 30-day comment period.¹⁴²

Tribal engagement. Stakeholders we interviewed also shared that the State of Maine did too little to coordinate or consult with Tribes on the state's road map process. Overall, they shared that the state also did too little to reach out to Tribe for the purpose of establishing government-to-government relations on the topic of offshore wind. Multiple non-Tribal stakeholder participants independently reported their observation that Maine left the Tribes in Maine out of the process conducted by the state.¹⁴³

However, observers also report that BOEM did a good job consulting with Tribes located in Maine. They report that BOEM engaged Tribes as nations and built close working relationships to understand their perspectives and interests through multiple meetings located in the Tribal communities.

Data gathering. Both the fishing industry and conservation groups as well as many other interest groups strongly desire more science to understand the marine environment and the impacts of offshore wind on that environment. The Maine stakeholders Gridworks interviewed overall share a fairly uniform trust in independent scientific research. The Fisheries and the Environment and Wildlife work groups of the Maine Consortium ran point on gathering and considering existing scientific studies of the marine environment and fishers.

After a long-running negotiation between the fishing industry and state and federal regulators over satellite-based continuous tracking on fishing boats, the technology is being rolled out as a requirement in the fisheries off Maine, with the marine scientific community expecting the additional data to provide useful information for understanding the marine environment. Despite the effort to gather more information, there remains a broad consensus that there is insufficient baseline information about the marine environment needed to evaluate the impacts of offshore wind.

Key takeaways from Maine to inform a Washington process:

Lessons learned about BOEM task force structure and public engagement efforts

- Prior to the launch of a task force, BOEM and the state would do well to engage in pre-launch engagement conversations with the well-established, well-identified, and well-engaged stakeholders in Washington.

¹³⁸ Massachusetts has a goal of 10 gigawatts and Maine has a goal of 3 gigawatts of offshore wind for the Gulf of Maine.

¹³⁹ BOEM draft Wind Energy Areas identified three Secondary Areas for further analysis that are in part in federal fishing Area One.

¹⁴⁰ [BOEM's Gulf of Maine projects page](#).

¹⁴¹ [BOEM's Gulf of Maine Draft Call Area Meetings](#)

¹⁴² [Draft Wind Energy Areas Notice– Commercial Leasing for Wind Power Development on the Gulf of Maine Outer Continental Shelf \(OCS\)](#)

¹⁴³ Stakeholders note that the Governor's Office did send a letter to Tribes, but Gridworks has been unable to find a public version.

- Stakeholders can find task force structures and engagement processes successful when decision-makers engage in dialogue with stakeholders and Tribes through one-on-one meetings.
- Locations of meetings, especially task force meetings, can contribute to public perception of process accessibility and meaningful engagement. For example, if task force meetings are physically located far from impacted communities, they can be considered inaccessible.
- Third party facilitation of meetings contributes to process success.
- Public comment periods at task force meetings that don't include stakeholders at the seat of those meetings should be long enough to allow stakeholders to fully express interests in and concerns about offshore wind.
- Stakeholders can deem processes successfully transparent and meaningfully engaging if end results demonstrably show how their input was considered and included in decision-making. For example, some in Maine's fishing industry believed their contributions to the BOEM process were worthwhile and their priorities, standards of avoidance, mitigation, and compensation were respected. This can be accomplished, in part, by hosting one-on-one working meetings with stakeholders who remain fully opposed to offshore wind development. For example, BOEM held working meetings with the fishing industry to examine maps and worked with marine and fisheries data to draw potential wind energy areas. Other meetings worked to identify gaps in baseline data.

Stakeholder observations on other state public engagement efforts

- Processes should establish respectful ground rules for communication and welcoming forums such as through a road map advisory committee, or other working groups and efforts.
- Road map forums can foster a constructive dialogue between the diverse interests of a state and facilitate personal relationships between the individuals representing the varied interests within the state, even as some tensions will remain between examining jobs, economic development opportunities, clean energy, and offshore wind technology versus community, environmental, and fishing industry concerns.
- Processes will be more considered more transparent and meaningfully engaging if they're willing to address hard-to-answer questions and difficult challenges, such as lack of baseline data on the marine environment or challenges like the estimation of offshore wind impacts.
- Relationship-building between state agency staff and participants through learning how the lives of the people in the affected communities related to the land and sea, including site visits, can help decision-makers understand other perspectives.

Stakeholder observations on tribal engagement

- Continuous, iterative, and respectful engagement with Tribes is key a procedural success.

California

Background. BOEM's consideration of California offshore wind was prompted by an unsolicited request for an offshore wind lease in 2016 by Trident Winds LLC and BOEM's determination of competitive industry interest in California offshore wind leases. In coordination with the state of California, BOEM initiated its competitive planning and leasing process that included consideration of all federal waters off the California coast and the formation of the BOEM California Intergovernmental Renewable Energy Task Force (task force). The task force had 64 members as of 2022, including 14 Tribal nations.^{144, 145}

The task force's purpose was to identify potential offshore wind areas suitable for leasing and development in federal waters off California, and like other BOEM task forces it did not have a formal decision-making role. Instead, the task force served as a forum to:

¹⁴⁴ California Intergovernmental Renewable Energy Task Force Meeting Five.

¹⁴⁵ California Intergovernmental Renewable Energy Task Force Meeting Five, membership roster. Tribes in attendance on the task force included: Bear River Band of the Rohnerville Rancheria, Blue Lake Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, Coyote Valley Band of Pomo Indians, Santa Ynez Band of Chumash Indians, and Tolowa Dee-ni' Nation.

- Discuss stakeholder issues and concerns,
- Exchange data and information about biological and physical resources and ocean uses and priorities, and
- Facilitate early and continual dialogue and collaboration opportunities.¹⁴⁶

Following the October 2016 task force meeting, BOEM and the state of California began a public engagement process to support BOEM's federal leasing process and the potential issuance of a "Call for Information and Nominations for Commercial Leasing for Wind Power Offshore California" in the Federal Register.¹⁴⁷ In 2018, BOEM proposed the Humboldt, Morro Bay, and Diablo Canyon Call Areas to formally solicit commercial interest in wind energy leases and wind energy development in those Call Areas.¹⁴⁸ In 2021, BOEM formally designated the Northern and Central California Call Areas and issued lease sales in 2022 for Humboldt Bay and Morro Bay.¹⁴⁹ In 2023, following the lease sales, BOEM executed five leases.¹⁵⁰

As California was coordinating with the federal offshore leasing process, the California Energy Commission (CEC) received state legislative directives to establish offshore wind planning goals and develop a strategic plan for achieving the planning goals for offshore wind.¹⁵¹ Assembly Bill 525 (AB 525), passed in 2021, directed the CEC to quantify the maximum feasible capacity of offshore wind for California and establish offshore wind planning goals for 2030 and 2045.¹⁵² In response, in 2022 the CEC issued the *Offshore Wind Development Off of California Coast* report.

The report set a preliminary planning goal of 2 to 5 gigawatts of offshore wind by 2030 and 25 gigawatts by 2045,¹⁵³ with the lower goal for 2030 reflecting the significant mobilization efforts and tight timelines for installing offshore wind by 2030.¹⁵⁴ Initially, the CEC's draft report proposed a lower threshold target for offshore wind by 2045, but the CEC adopted the 25 gigawatt goal in light of the California governor's call for an "aspirational target" and based on additional studies and comments it received.¹⁵⁵ More recently, the CEC issued a draft of the last report required by AB 525, the *Draft Offshore Wind Strategic Plan*. The strategic plan will provide an overview of the issues and challenges in achieving offshore wind goals as well as recommendations for a path forward.

Process. BOEM held its first of five task force meetings in 2016, shortly after BOEM and California created a stakeholder outreach plan.

From February 2017 and September BOEM and California held 67 engagement meetings with elected officials, commercial fishing community, mariners, academics and environmental groups, and the public.¹⁵⁶ Many of these meetings, especially those for mariners and the commercial fishing community, were conducted in communities up and down the coast of California. BOEM and California engagement activities between 2018 and the end of 2020 were hampered by the COVID pandemic, but 14 meetings were conducted with Tribes and coastal and fishing communities.¹⁵⁷

¹⁴⁶ [BOEM-Offshore-Renewables-Factsheet—02-22-17](#), page 1.

¹⁴⁷ Outreach Summary Report California Offshore Wind Energy Planning, Updated September 2018.

¹⁴⁸ [California Activities | Bureau of Ocean Energy Management \(boem.gov\)](#).

¹⁴⁹ [BOEM Website, under California activities](#). The Humboldt WEA is in the Northern California lease area and the Morro Bay WEA is in the Central area lease area.

¹⁵⁰ [BOEM Website, under California activities](#).

¹⁵¹ [Offshore Wind Energy Development Off the California Coast](#), August 2022, page ii. AB 525 requires four steps: the feasibility and target setting report; an assessment of the economic benefits of offshore wind; preparation of a permitting roadmap; and a strategic plan for achieving the offshore wind goals.

¹⁵² *Offshore Wind Energy Development off the California Coast*, August 2022, page 1. California has a centralized planning and acquisition process for the state.

¹⁵³ *Offshore Wind Energy Development off the California Coast*, August 2022, page 5.

¹⁵⁴ These goals were in turn used in the California Independent System Operator transmission study.

¹⁵⁵ *Offshore Wind Energy Development off the California Coast*, August 2022, page 5.

¹⁵⁶ Outreach Summary Report California Offshore Wind Energy Planning Updated September 2018 Page 3.

¹⁵⁷ Outreach Summary Report Addendum California Offshore Wind Energy Planning Updated June 2021, page 2.

In 2019, alongside the BOEM task force, U.S. Representative Salud Carbajal and California formed an ad-hoc working group¹⁵⁸ inspired in part by federal Department of Defense (DoD) concerns with the Morro Bay and Diablo Canyon Call Areas. The working group included DoD, BOEM, NOAA's Office of National Marine Sanctuaries, and Congressman Panetta's office. The working group met multiple times, eventually proposing "additional areas for consideration."¹⁵⁹

Between January 2021 and December 2022, public engagement ramped up: California and BOEM led a total of 151 meetings, including 41 Tribal meetings largely led by California's Energy Commission.¹⁶⁰

The 220+ meetings conducted over the six years from 2016 to 2022 covered an array of issues surrounding offshore wind in California, including smaller gatherings with specific interest groups on specific topics that allowed far more detailed discussions of issues than were achievable at large venue meetings. The Outreach Summary Report and its addendums provide a very high-level summary of the issues raised at the many meetings with specialized topics.

Data Gathering. BOEM has funded, in full or in part, studies of seabirds, black brant, and California-specific studies of whales, bats, the seabed, and leatherback Sea Turtles.¹⁶¹

In partnership BOEM, the California Energy Commission and the California Public Utilities Commission maintain the California Offshore Wind Energy Gateway database that assembles geospatial information relating to issues of offshore wind.¹⁶² The data sharing and mapping platform allows state and federal agencies, interested stakeholders, and the public full access and use of the data and information compiled in that database.

Tribal Engagement. Working in conjunction with the California Energy Commission, the state's lead agency on Tribal affairs related to offshore wind, BOEM hosted engagement with federally and non-federally recognized Tribes in California.¹⁶³ The outreach began in late 2016 with Tribes that had current and/or ancestral territories along the coast. BOEM issued letters to federally recognized Tribes to invite their participants in the task force.¹⁶⁴

Engagement expanded in 2017 with California's creation of the State Tribal Offshore Renewable Energy Working Group (working group).¹⁶⁵ The working group's purpose was to solicit input from federally and non-federally recognized Tribes, inform the California offshore renewable energy planning efforts, and streamline information exchange between the State and Tribes.¹⁶⁶

¹⁵⁸ Outreach Summary Report Addendum California Offshore Wind Energy Planning Updated June 2021, page 2-3. It eventually achieved the name Central California Offshore Working Group

¹⁵⁹ Outreach Summary Report Addendum California Offshore Wind Energy Planning Updated June 2021, page 3.

¹⁶⁰ Outreach Summary Report Addendum California Offshore Wind Energy Planning, November 2023, page 3.

¹⁶¹ [Selected BOEM-Funded Research Informing Renewable Energy Offshore California](#), August 2023

¹⁶² <https://caoffshorewind.databasin.org/>

¹⁶³ "The State of California has an obligation to consult with all California Native American tribes regardless of federal recognition." Outreach Summary Report: California Offshore Wind Energy Planning, update September 2018, Page 37 and 39.

¹⁶⁴ Outreach Summary Report California Offshore Wind Energy Planning Updated September 2018, page 19.

¹⁶⁵ Outreach Summary Report California Offshore Wind Energy Planning Updated September 2018, page 37-38. California held five regional informational meetings for Tribes between November 21, 2016 and May 18, 2017, and a sixth informational webinar for all California tribes on June 30, 2017.

¹⁶⁶ Outreach Summary Report: California Offshore Wind Energy Planning, update September 2018, page 37.

In September 2018, BOEM again reached out via phone call and emails to federally recognized Tribes to update them and re-invite their participation.¹⁶⁷

Overall, BOEM's engagement with Tribes included bi-lateral meetings between BOEM and individual Tribes, joint meetings with the CEC, other state agencies, BOEM, and Tribes on the North Coast and Central Coast, and a multi-Tribe consultation webinar with BOEM.¹⁶⁸

Institutional capacity. California took a strong lead in examining and developing offshore wind, driven in a large part by state leadership and legislation. BOEM and California worked jointly together in much of their public engagement efforts. California's own state-based statutes that create a legal obligation to consult with Tribal nations positioned California to play a lead role in Tribal engagement. Specific issues related to offshore wind, such as impact on U.S. Department of Defense operations, transmission needs, and underwater cable routing were examined through working groups and jurisdictional agencies with expertise. Of note, California's institutional landscape and resources—such as agencies like the CPUC, CEC, and CAISO, each with their own engagement processes and procedures—are able to address questions about how much offshore wind contributes to state energy goals or how transmission might enable offshore wind's connection to the grid and allow the state to provide more capacity to the evaluation of offshore wind than other states like Oregon, Washington, or Maine are internally set up for. Oregon and Maine are more directly comparable to Washington given their makeup and state capacity resources.

That said, process approaches from California could be scaled to Washington institutions and resource capacity. For example, Washington agencies like the Department of Ecology, Department of Commerce, and the Utilities and Transportation Commission could lead on efforts to elucidate information needed for planning and evaluation of offshore wind, such as by articulating how or in what way the state would consider the development of offshore wind to meet state energy goals, among other priorities.

Key takeaways from California to inform a Washington process:

Lessons learned about state and federal engagement processes

- Stakeholders may feel that formal meetings that are presentation heavy defeats goals of decision-makers listening to the community. Instead, states and BOEM should “meet communities where they're at” and provide communities with two-way dialogue on issues of importance to them.
- Decision-makers shouldn't overstate their knowledge or understanding of marine matters, including science, fish populations, and the fishing industry. Doing so, especially without acknowledging data gaps, may weaken credibility in the eyes of stakeholders.
- States will have a fine line to thread between sufficient engagement and causing meeting or process fatigue. To help tow this line, states should develop engagement plans with input from stakeholders, communities, and Tribes.
- Direct engagement between communities and developers can also be helpful, especially if developers demonstrate willingness to move boundaries, use active listening, and allow for personal relationship-building. Wind developers should be present, participate, and be available in processes for considering offshore wind.
- Third-party facilitators are important procedural elements, and should also have some subject matter expertise, such as on marine issues.

Lessons learned about transparency and meaningful engagement

- Perceptions of transparency and meaningful engagement can be improved when stakeholders feel that decision-makers understand the perspectives of stakeholder groups and individuals,

¹⁶⁷ Outreach Summary Report California Offshore Wind Energy Planning Updated September 2018, page 19

¹⁶⁸ The Section 106 requires federal agencies to consider the impacts of their actions on properties of religious and cultural significance to Indian tribes. [CONSULTATION WITH INDIAN TRIBES \(achp.gov\)](https://www.achp.gov/).

and when decision-makers offer two-way dialogue opportunities that demonstrate how and why decisions are made.

- Environmental impact statements should be carefully developed with input from state-level agencies.
- Prior to issuance, BOEM and the state could work to deconflict Call Areas and Wind Energy Areas with known and well-established existing uses and restrictions.

Lessons learned about state leadership

- Provisions for leasing and other best management practices can be outlined prior to offshore wind leasing and subsequently included in leasing efforts. For example, California's lease auction included bid credits for developers committed to developing community benefit agreements in addition to other requirements that companies developing offshore wind projects in California enter into labor agreements and work with Native American Tribes. Considering the state of California's support for offshore wind and its all-agency engagement in realizing offshore wind deployment, some in the fishing industry would welcome more encouragement from the state in fostering and encouraging the development of community benefit agreements (CBAs). One fishing representative recommended industry-to-industry CBAs with careful attention paid to the construction and administration of the CBA.
- States should look at what authority they have through existing statutes and agencies prior to entering a leasing process and leverage those powers to reduce the impacts of offshore wind development or leasing.

APPENDIX C: DISCUSSION MATRIX FROM GRIDWORKS' ENGAGEMENT MEETINGS

(see attachment)

Type of Organization	Topic type	How reflected in Gridworks' report and/or recommendations	1-2 sentence summary of idea
Clean Energy	1. Federal Process & BOEM	See Recommendation 7, Transparency, inclusivity, trust, and meaningful engagement guidelines	Is there money for a FTE outside of CA? Having a dedicated person in Washington could be useful
Clean Energy	1. Federal Process & BOEM	Reflected in Section 3, Considerations Unique to Washington and Summary of Washington Interviews and Synthesis of Research as well as Recommendations	The Department of Defence is going to be a big player in this process, given their location and activity offshore Washington.
Clean Energy	1. Federal Process & BOEM		Oregon informal working groups have been productive. The meetings are not public facing, which allows people to engage in hard conversations and feel heard.
Clean Energy	1. Federal Process & BOEM		In the OR process, BOEM avoided 98% of the fishing areas that were deemed important from the fishing community.
Clean Energy	1. Federal Process & BOEM	Reflected in Section 3, BOEM chapter and Summary of Washington Interviews and Synthesis of Research	the BOEM meetings were well-run meetings, but the frustration happens because BOEM is a siting agency running a siting process with a goal of deployment.
Commercial Fishing	1. Federal Process & BOEM		Concerned this project presumes BOEM will start an offshore wind leasing and exploration process in Washington. The question should not be "when BOEM begins," but "whether or not BOEM starts a process in Washington." [x4]
Commercial Fishing	1. Federal Process & BOEM	Reflected in Section 4, See Recommendations 3 and 7	BOEM has provided no way for the public to influence call areas prior to an initial draft. The state could help lead an effort to "deconflict" the call areas prior to release (i.e. look into existing conflicts and scope BOEM's initial call areas)

Commercial Fishing	1. Federal Process & BOEM		BOEM has said it can't involve the public because of costs/they can't pay the public to participate. How can we get dollars in the federal budget to ensure members of the public and the fishing industry are involved in the BOEM process?
Commercial Fishing	1. Federal Process & BOEM	See Recommendations 6 and 7	BOEM task force is not chartered under the Federal Advisory Committee Act, and there is no room for the public to act or speak in its processes. If there is going to be a taskforce, the state should recommend BOEM charter it under the FACA. This could lead to more trust
Commercial Fishing	1. Federal Process & BOEM		BOEM order of operations violates NEPA process and endangered species processes
Commercial Fishing	1. Federal Process & BOEM	See Recommendations 3 and 6	Fishing industry needs to be represented in a task force because industry data/fisheries data has not been well represented by task force members in the past. Example: BOEM shared a map of fishing areas during a task force meeting; the map was sparse and under populated but fishermen couldn't speak up to clarify or ask questions of the map during the meeting and it went undiscussed/not captured in BOEM's meeting records.
Commercial Fishing	1. Federal Process & BOEM	Reflected in Section 4	Given the Biden Administration's focus on offshore wind, it seems like a pro-offshore wind stance has already been set and holds little space for precautionary principles or understanding potential environmental, socio-economic, marine and avian species, and power cost impacts that could occur. Will OSW at scale be a blessing or a curse?
Commercial Fishing	1. Federal Process & BOEM		NMFS should spearhead the PEIS process independent of BOEM. The state should serve as an advisor along with stakeholders in the fishing industry.
Commercial Fishing	1. Federal Process & BOEM	See Recommendation 3	Process should start with the question of whether an offshore wind leasing exercise should happen at all
Commercial Fishing	1. Federal Process & BOEM	See Recommendations 1, 5, 6, and 7	Any process should include a go/no-go option.

Commercial Fishing	1. Federal Process & BOEM		The BOEM engagement process plan in Oregon was adequate, but BOEM did not seem to follow the plan
Commercial Fishing	1. Federal Process & BOEM	Reflected in Section 4	Under the 30/30 plan, Washington was not included in the West-coast targets for offshore wind development and Washington's wind resource is less robust than California or Oregon.
Commercial Fishing	1. Federal Process & BOEM		Washington state should not ask for a BOEM task force. Once a task force has been initiated, there is no state authority over decision-making or processes
Commercial Fishing	1. Federal Process & BOEM	See Recommendation 7	BOEM doesn't respond to any comments/requests from stakeholders or those from Tribes, as evidenced by Tribal letters and letters from other stakeholders. While BOEM has collected vast numbers of comments from many and varied interests collectively expressing skepticism and concern over process and recurrent requests for cumulative impact analysis, BOEM has not provided direct responses or answers. Tribal sovereigns echo many of other stakeholder concerns but also hold rights to direct government-to-government consultations, which, by tribal accounts, has not occurred.
Commercial Fishing	1. Federal Process & BOEM		Many representatives at today's meeting are fully opposed to OSW development (not everyone expressed direct positions) due to past experience with a flawed process, such as BOEM's insistence to proceed with policy decisions before adequate data collection and review
Commercial Fishing	1. Federal Process & BOEM		How do we get to a win-win situation? BOEM process is a lose-lose situation
Commercial Fishing	1. Federal Process & BOEM	Reflected in Section 3, See Recommendation 7	Lack of transparency in decision-making for all stakeholders, not just the fishing industry. Decisions are made based on arbitrary and capricious timelines and policy agendas and not through open discussions, dialogue, and data.

Commercial Fishing	1. Federal Process & BOEM	See Recommendation 7	BOEM provided a public engagement process plan for Oregon. The plan, if it had been enacted, may have been adequate in terms of public engagement. There were some good ideas in the engagement plan, however BOEM did not follow its own plan.
Conservation	1. Federal Process & BOEM	Reflected in Sections 3 and 4; See Recommendations 2 and 3	The BOEM process stages and separates analysis of things like transmission development and port impacts, things we need to know early and upfront—state could play a role in looking into these issues up front.
Conservation	1. Federal Process & BOEM	See Recommendation 7	BOEM does extend the comment period upon request if enough people request, but they do not share news of the extension until the day the comment period was originally scheduled to end.
Conservation	1. Federal Process & BOEM		BOEM's public comment periods are almost all too short, but they may be limited by regulation. The shortest period is 30 days
Conservation	1. Federal Process & BOEM	Reflected in Sections 3 and 4	There is the sense that once the federal government is invited into the process, state stakeholders feel that the train is moving and there is no ability to change anything (even though there are still ways to provide input).
Conservation	1. Federal Process & BOEM		A participant shared that they thought 60 days was an appropriate and adequate amount of time for a public comment period.
Conservation	1. Federal Process & BOEM	Reflected in Sections 3 and 4	There has never been a time where BOEM explored OSW and then stopped the process, except perhaps in Hawaii. Could the state stop a BOEM process once started?
County Government	1. Federal Process & BOEM	Reflected in Sections 3 and 4; See Recommendation 7	It would be best to work with individual county commissions to set up informational work sessions in the BOEM process.
County Government	1. Federal Process & BOEM		BOEM should coordinate with Washington Associate of Counties
County Government	1. Federal Process & BOEM		Decision-making processes/bodies should be representative of impacted groups/communities interests.

County Government	1. Federal Process & BOEM		Short deadlines within a long process are not well received, especially for turning around comments. Short is defined as 30 days or less
County Government	1. Federal Process & BOEM		The appointment of individual to a task force should be carefully considered. Ad hoc seats or general membership are tricky, because a certain level of education is needed.
County Government	1. Federal Process & BOEM	See Recommendation 7	In a task force (or any advisory process), set out principles first, create standards about how the group is going to work, and what standards are going to be upheld. Give the group this responsibility from the start, and allow them to establish their working rules.
County Government	1. Federal Process & BOEM		Technical support may be more valuable than monetary support, especially for engaging government agencies and stakeholder organizations
County Government	1. Federal Process & BOEM		Timing for notices should be minimum 30 days, but 90 days is ideal timing
County Government	1. Federal Process & BOEM		Communities need at least 90 days to discuss important issues, but 6 months or longer is better.
County Government	1. Federal Process & BOEM	Reflected in Sections 3 and 4; See Recommendation 6 and 7	There are concerns with the intergovernmental taskforce model. There is skepticism that this would be a government-only body
Labor	1. Federal Process & BOEM	Reflected in Appendix B	BOEM's Oregon process was not well received by coastal communities and fishing industry
Labor	1. Federal Process & BOEM	See Recommendation 3 and 5	It is important to have an equal number of labor and business representatives on any task force. A structure that does not afford labor the same voice as industry is concerning.
Labor	1. Federal Process & BOEM	See Recommendation 3	What is the interplay with transmission coming from a BOEM project into WA? Where is the power going and how is transmission line access going to happen?
Local Government	1. Federal Process & BOEM	See Recommendation 6	A taskforce model would 'be a tough sell' after the OR process, but local leaders are willing to serve on the taskforce

Local Government	1. Federal Process & BOEM	Reflected in Section 3 and 4	BOEM's current work seems reactive, and any future process should be proactive
Local Government	1. Federal Process & BOEM	See Recommendation 7	Is there one contact at BOEM that would be the point person for WA efforts, and interfacing with all local agencies?
Marine Resources Committees	1. Federal Process & BOEM	Reflected in Sections 3 and 4	BOEM receives directives and guidance from the president. There is already a conclusion around the decision in its leasing efforts.
Marine Resources Committees	1. Federal Process & BOEM		There is use to stakeholders being able to attending meetings where they can't speak (like taskforce meetings) to follow conversations
Marine Resources Committees	1. Federal Process & BOEM	See Recommendation 7	A website that maps out BOEM processes and current actions will be helpful
Marine Resources Committees	1. Federal Process & BOEM		Consistency among BOEM and state staff would be helpful—to show that someone is tracking and following these long conversations.
Marine Resources Committees	1. Federal Process & BOEM		BOEM and the state should present to groups who don't request presentations or otherwise volunteer to engage—try harder to involve local interests.
Marine Resources Committees	1. Federal Process & BOEM		In a conversation with BOEM one year ago in a WCMAC meeting, they asked the question: What would stop a BOEM process once it began?
Marine Resources Committees	1. Federal Process & BOEM		BOEM needs to stop making money and leasing their primary motivator and driver
Maritime	1. Federal Process & BOEM	See Recommendation 6 and 7	BOEM ignored maritime interests, going through motions to 'check the box'. BOEM needs to operate openly and talk to all the waterways users out there.
Maritime	1. Federal Process & BOEM		Ports are public-private infrastructure, as presumably offshore wind projects will be. It is important to talk to people who understand public private partnerships in an engagement process.

Maritime	1. Federal Process & BOEM	See Recommendations 6 and 7	Maritime interests have written many letters and comments, which BOEM seemed to largely ignore though it now appears there is more dialogue with the Coast Guard regarding shipping lanes and marine safety. Industry and associations like PMSA have infrastructure to provide policy makers relevant information and were created, in part, to do so, so it is shocking when industry is not invited to the table.
Maritime	1. Federal Process & BOEM	See Recommendations 6 and 7	BOEM needs to identify all relevant stakeholders and have meaningful and transparent decision making. Stakeholders want to talk, and BOEM needs to listen and incorporate relevant, valid perspectives into the process
Maritime	1. Federal Process & BOEM	See Recommendations 6 and 7	Stakeholders should be invited to provide presentations when appropriate at a taskforce, and input should be available to the public.
Ports	1. Federal Process & BOEM	See Recommendations 3, 5, 6, and 7	The Pilots Association will be a good contact to reach out to during an engagement process
Ports	1. Federal Process & BOEM	See Recommendation 7	Port needs a briefing to the port commission. Port commissioners would need to be briefed before the commission took any action. Port expects public education around what the BOEM process is, and we'd want this briefing to take place in our marina so that folks could be there in person. (Not just the Port, but ALL locally elected boards/councils need a briefing, especially if they would be asked to take any kind of action or support for a proposed project)
Ports	1. Federal Process & BOEM	See Recommendation 7	Port could be a partner in this work and in adjusting BOEM processes.
Ports	1. Federal Process & BOEM	See Recommendation 7	Casting a broader net to all elected boards would be helpful. Community concerns are our priority
Ports	1. Federal Process & BOEM	See Recommendations 6 and 7	Port is interested in participating in an intergovernmental task force, but participation would likely be a staff member attending and then reporting back to the commissioners

Ports	1. Federal Process & BOEM	See Recommendations 6 and 7	Every coastal city should be represented in the intergovernmental task force
Ports, Local Government, and Economic Development	1. Federal Process & BOEM		Local governments/communities feel left out of the process and steamrolled/ignored by decisions coming from state and federal governments.
Ports, Local Government, and Economic Development	1. Federal Process & BOEM	Reflected in Sections 3 and 4	Pacific County has a shoreline management plan to have a seat at the table for things like offshore wind development discussions—we want a seat at the table to have influence.
Ports, Local Government, and Economic Development	1. Federal Process & BOEM	See Recommendation 6 and 7	Task Forces/advisory bodies should include representation of local communities by including local government representatives on the advisory body/task force; however there should also be representation of non-government stakeholders like the fishing industry and community members.
Recreational Fishing	1. Federal Process & BOEM		BOEM doesn't seem to have the expertise to understand these different industries that will be affected by offshore wind development
Recreational Fishing	1. Federal Process & BOEM	See Recommendation 7	There is a need for clear expectations from BOEM in terms of their plans with Washington.
Recreational Fishing	1. Federal Process & BOEM		The fisherman view the Tribes and fishing community are strong partners in this work. How the Tribes are treated from the outset determines how this process will go
Research	1. Federal Process & BOEM		BOEM's public comment policies are changeable. They are not federal law
Research	1. Federal Process & BOEM		BOEM is moving forward with leasing at a pace that does not make sense: The economics of floating offshore wind development are not competitive with other forms of generation in WA and may not be competitive for 15-20 years.

Research	1. Federal Process & BOEM		BOEM has been non-responsive to concerns that have been raised in other state processes, in part because there is no way for BOEM to be responsive to any concerns
Research	1. Federal Process & BOEM	See Recommendation 1, 3 and 5	There is no off ramp for BOEM to begin a process and then not issue a lease
Research	1. Federal Process & BOEM		The idea that we need to solve this offshore wind problem in the next six months doesn't make sense because 2045 is when OSW may come online in WA in a significant manner
Research	1. Federal Process & BOEM	See Recommendation 1, 3 and 5	There appears to be no off ramp for BOEM to begin a process and then not issue a lease
Research	1. Federal Process & BOEM	See Recommendation 1, 3, 5, and 7	BOEM has set itself up for very angry input, given the inability of BOEM to address or respond to all comments and concerns. This is exacerbated by BOEM and developer statements that fishing will precluded within any floating offshore wind area once projects are developed – this gives the fishing industry considerable incentive to oppose the leasing process.
Research	1. Federal Process & BOEM	Reflected in Sections 3 and 4	BOEM has been non-responsive to concerns that have been raised in other state processes, in part because there is no way for BOEM to be responsive to maximalist requests to halt leasing or engage in decadal environmental studies as a precursor to leasing
Tribal-led organization	1. Federal Process & BOEM	Reflected in Appendix B	BOEM fast tracked the Oregon process. Though there were engagement efforts, the process lacked meaningful tribal consultation. Oregon fell behind BOEM's engagement to the detriment of the process and Tribal engagement.

Tribal-led organization	1. Federal Process & BOEM	See Recommendations 4 and 7	Washington State and BOEM need to have a physical presence in the community. There is a significant difference between in-person presentations where the presenters are in-and-out in an hour versus someone in the community to talk to and be a presence in the community.
Tribal Government	1. Federal Process & BOEM		We oppose offshore wind without a better understanding of impacts. There seems to be engagement happening in the community, but there are no actions taken that seem to listen to this community input or the needs of the tribe. Economic impacts are a prime example: this type of development seemingly provides a boon to a community, but it may also price out community members not directly tied to the development
Tribal Government	1. Federal Process & BOEM	See Recommendation 7	It seems like there is no stopping a BOEM process once it starts. It seems you can ask questions to BOEM but they do not necessarily answer them
Tribal Government	1. Federal Process & BOEM	See Recommendation 7	There is no targeted outreach to tribes from BOEM. All tribes are getting the same email from BOEM.
Tribal Government	1. Federal Process & BOEM	See Recommendation 7	BOEM needs to work on their government-to-government efforts
Tribal Government	1. Federal Process & BOEM	Reflected in Sections 3 and 4	At an intergovernmental task force, every tribe should have a seat at the table. However, tribal staffing and tribe sizing makes this hard. BOEM should help fund tribes for these targeted approaches.
Tribal Government	1. Federal Process & BOEM		Developers have approached us with ideas about impact mitigation and benefits to community and tribes, rather than asking us for ideas. They have come to council 2-3 times, and we've asked for more direct answers but those answers haven't been provided. We don't feel this engagement is genuine.
Developers	1. Federal Process & BOEM		When BOEM gets to the table, people think the decision has been made. There have only been a handful of times that BOEM has walked away from a leasing decision (in broader energy issues, not offshore wind)

Developers	1. Federal Process & BOEM	Reflected in Sections 3 and 4	The BOEM process to determine call areas and wind energy areas is not transparent. The developers are not included or informed about anything before the public announcements are made
Clean Energy	2. State Processes & BOEM	Reflected in Section 3, Considerations Unique to Washington	WA has legally binding laws around clean energy targets. How will the state meet its clean energy laws?
Clean Energy	2. State Processes & BOEM	Reflected in Recommendation 5	Washington needs to get out ahead of the issue with an offshore wind roadmap process.
Clean Energy	2. State Processes & BOEM		If OSW doesn't go forward in Washington, there should be thought about how Washington supports supply chain and labor in California and Oregon offshore wind.
Clean Energy	2. State Processes & BOEM		There does not seem to be any great examples of community engagement in Washington to emulate. Any new process will have to put in the work to create a public engagement process from the ground up.
Clean Energy	2. State Processes & BOEM	Reflected in Section 4	The state would be more trusted than BOEM
Commercial Fishing	2. State Processes & BOEM	Reflected in Section 3 and Section 4	Distrust is the giant elephant in the room; emphasis should be placed on state actors.
Commercial Fishing	2. State Processes & BOEM		How could the BOEM process learn from the Magnuson Act processes and requirements? Magnuson Act provides a collaborative framework for decision-making. Alternative development and impacts analysis takes place in a public process. The NEPA process is separate, but is often run concurrent to the MSA process because it is a useful structure for discussing and analyzing impacts. Even controversial decisions are more bearable if the affected public feels like they have the opportunity to engage with and influence the process. Decisions are made/voted/decided in front of stakeholders through the Magnuson Act processes. Decisions are made/voted/decided in front of stakeholders
Commercial Fishing	2. State Processes & BOEM	See Recommendation 3	Lack of clarity around the Governor's goals in pursuing his engagement process planning

Commercial Fishing	2. State Processes & BOEM	Reflected in Section 3, See recommendation 3	The Washington Marine Spatial Plan offers guidelines for any future processes considering new ocean uses and potential negative impacts and must be followed; the Marine Spatial Plan also needs to be updated (ex. Maps are outdated and new data layers should be added)
Commercial Fishing	2. State Processes & BOEM	See Recommendation 3 and 5	Regarding state leadership efforts, stakeholder exclusion from the State Ocean Caucus is also concerning. Ocean users do not sit at the policy table.
Commercial Fishing	2. State Processes & BOEM	See Recommendations 2, 3, and 5	The State of Washington should have its own process separate from BOEM
Commercial Fishing	2. State Processes & BOEM		We have struggled with some state council processes, but usually they get things done, WDFW is a respectful partner. BOEM is different
Conservation	2. State Processes & BOEM	See Recommendation 3	SB 5165 sets up long-term utility energy planning and tasks EFSEC with conducting PEIS for transmission issues. Could EFSEC have a role?
Conservation	2. State Processes & BOEM	Reflected in Section 3	HB 1216 from 2023 set up a Washington state interagency process for recommending zones for clean energy siting; currently a land-based review but options available for marine energy as well
Conservation	2. State Processes & BOEM	Reflected in Section 3, Appendix B, and Section 4, see Recommendation 1, 3 and 5	California did a good job in terms of state leadership, and got additional lease stipulations into the BOEM process due to the consistency process they did
Conservation	2. State Processes & BOEM	See Recommendation 3 and 6	WCMAC has a role here and would welcome more investment from the state, though WCMAC may not be large enough to handle the entire conversation of an issue as complex as offshore wind in Washington, given its current makeup.
Conservation	2. State Processes & BOEM	Reflected in Section 3, Appendix B, and Section 4, see Recommendation 5	<u>HB 4080</u> initiates a roadmap in Oregon, but it would have been helpful to have this roadmap prior to a BOEM process. California also has a road map process created through AB 525

Conservation	2. State Processes & BOEM	Reflected in Section 3 and 4, See Recommendation 1, 2, 3, and 5	The strategic approach should be developed before going forward with BOEM processes or leasing efforts.
Conservation	2. State Processes & BOEM	Reflected in Section 3, 4 and Appendix B; See Recommendation 1, 2, 3, and 5	A proactive, strategic approach from the state is incredibly beneficial. The experiences in Maine and California show great examples of different approaches by each state.
County Government	2. State Processes & BOEM	See Recommendation 3, 6, and 7	Decision-making processes/bodies should be representative of impacted groups/communities interests.
County Government	2. State Processes & BOEM		Comment periods should be 30 days minimum and 90 days max.
County Government	2. State Processes & BOEM	Reflected in Sections 3 and 4; See Recommendation 6 and 7	Build in community input time from the beginning.
County Government	2. State Processes & BOEM		There's no perfect answer to having representation on decision-making bodies. Public input is very important and for decision-making you still need a higher understanding of all the issues at hand. Ad hoc representation is not always useful.
County Government	2. State Processes & BOEM	See Recommendation 6 and 7	In an advisory body to a decision-maker, include PUDs, the marine sanctuary, fisheries groups, economic development councils, federal economic development districts, BPA, and other partners.
Local Government	2. State Processes & BOEM	Reflected in Section 3 and 4	A state-led process or plan in place is preferable, where the state can conduct field hearings and provide information. This information could then be front-loaded into the later taskforce with BOEM
Marine Resources Committees	2. State Processes & BOEM	See Recommendations 3 and 6	WCMAC could assist as an advisory body
Marine Resources Committees	2. State Processes & BOEM	See Recommendation 1	Changing the type of bureaucratic process around offshore wind won't convince people to support offshore wind. The only way the state can "improve" a process is through exercising its CZMA enforceable policies through federal consistency.

Marine Resources Committees	2. State Processes & BOEM	See Recommendations 3 and 6	WCMAC will be a helpful venue to address concerns before siting conversations.
Marine Resources Committees	2. State Processes & BOEM	See Recommendation 3	In a process, there needs to be an opportunity to use big questions as a filter in the beginning. These filter questions should include: Is this best for Washington? Do we have the grid to support this energy? Will this be a benefit? Is the weather actually going to support this energy? Can we sell this energy in the future?
Marine Resources Committees	2. State Processes & BOEM	See Recommendation 3	These filter questions should be answered clearly (clear yes or no), before we dive into spending money on research and development for offshore wind. The State needs to answer these questions, and it should center coastal communities in its answers.
Marine Resources Committees	2. State Processes & BOEM		There is no actionable way the state can stop the BOEM process once it begins.
Maritime	2. State Processes & BOEM	See Recommendation 1	The State will have a lot to do with permitting land-based structures that accompany the offshore wind buildout.
Maritime	2. State Processes & BOEM		What is driving this decision and beginning of process considerations?
Maritime	2. State Processes & BOEM		The transportation plan and economic corridor investments under Governor Christine Gregoire was a great example of consensus building and community engagement processes
Maritime	2. State Processes & BOEM		The Harbor Safety Committee is a good group to share and discuss waterways perspectives, primarily focused on internal waters. This is a committee of about 50 people that meet every other month.
Ports, Local Government, and Economic Development	2. State Processes & BOEM	See Recommendation 6 and 7	BOEM/state need to actually use stakeholder input—we feel we are completely ignored/steamrolled.
Ports, Local Government, and Economic Development	2. State Processes & BOEM	See Recommendation 6 and 7	Engagement should take place through local meetings in communities and in partnership with local government.

Ports, Local Government, and Economic Development	2. State Processes & BOEM		Process should include accountability for mistakes and consequences for “getting it wrong.” IE what recourse do communities have if they’ve been promised throughout a process that there would be few impacts and, once a project is developed/running, it turns out there are many?
Ports, Local Government, and Economic Development	2. State Processes & BOEM	See Recommendation 7	Use a third-party facilitator who is trusted by the local community
Recreational Fishing	2. State Processes & BOEM		It is important that Washington state develops its own process, but the state cannot independently conduct a large process and outside funding and expertise should be considered
Recreational Fishing	2. State Processes & BOEM	Reflected in Sections 3 and 4; See Recommendation 3	There is a need for clear expectations from the Governor’s office with their plans with offshore wind
Research	2. State Processes & BOEM		The states have a fair degree of authority and leeway. Under President Trump’s administration, the western states banded together to oppose future offshore oil and gas drilling and oppose buildout anywhere onshore.
Research	2. State Processes & BOEM	See Recommendations 1, 3, 5, and 6	States also have power in state waters and state lands. Washington should be exploring areas where transmission lines can come onto shore to help eliminate a lot of uncertainty and would help with studying impacts.
Research	2. State Processes & BOEM		
Research	2. State Processes & BOEM		WCMAC and the technical committees are having reoccurring conversations about how new technology is coming online to the grid and legal prohibitions on power purchase agreements in excess of the lowest available generation cost.
Research	2. State Processes & BOEM		Washington has said they want to support supply chain buildout without supporting offshore wind itself. This is a thin edge to balance.

Research	2. State Processes & BOEM		There are a lot of problems that Washington should consider and address in the next 20-30 years, and a proactive working relationship with BOEM at a slower pace will be more beneficial than rushing into leasing.
Research	2. State Processes & BOEM	See Recommendation 3	State policy should be to explore multi-use seascape for a time in the future, when offshore wind economics are favorable and look at how multiple sea co-uses could live together (vs offshore wind development that has major impacts and few benefits to fishing and coastal communities).
Tribal-led organization	2. State Processes & BOEM	See Recommendations 4 and 7	The state needs to get to the root of the issues between BOEM and tribes and assert pressure to BOEM about its consultation history and processes. The state should help tribes out in pressuring BOEM to step up, such as encouraging the head of the Dept of Interior to do a better job.
Tribal-led organization	2. State Processes & BOEM	Reflected in Sections 3 and 4	The state government should get involved on a timeline that is ahead of BOEM's timeline for offshore wind
Tribal-led organization	2. State Processes & BOEM		There needs to be more public process before any offshore wind development/leasing process starts, so it does not look like a political push. Instead of coming from Inslee's administration, direction should come from the state legislature. A process that takes less than three years will just look like a rushed process.
Tribal-led organization	2. State Processes & BOEM	See Recommendations 3 and 5	How can the state rise above political processes? Look to the Oregon road map for offshore wind as an example. Washington's direction should come from the legislature.
Tribal Government	2. State Processes & BOEM		The Tribal Chairman has met with the Governor's Office
Tribal Government	2. State Processes & BOEM		Oregon tribes wish they got to the table with BOEM earlier, we are glad that Washington is moving forward with this conversation before BOEM starts anything

Tribal Government	2. State Processes & BOEM	See Recommendation 5	A state road map would be helpful, and all tribes, not just coastal treaty tribes, should be engaged in the process.
Tribal Government	2. State Processes & BOEM	Reflected in Section 4	Any state process should be additional to the government-to-government process that BOEM and the state should be having with tribes—treaty tribes and executive tribes
Tribal Government	2. State Processes & BOEM		There will never be a uniform voice from the coast about decisions or how a task force should be structured.
Tribal Government	2. State Processes & BOEM	Reflected in Section 4	Tribes don't want the Governor's Office to be their voice when talking to BOEM; the federal government has a trust responsibility to tribes.
Tribal Government	2. State Processes & BOEM		WCMAC is not the best venue for engagement in the state. There are concerns locally about how WCMAC functions and what opinions it shares.
Tribal Government	2. State Processes & BOEM		This engagement process should be better, or there should be another engagement process
Developers	2. State Processes & BOEM	See Recommendation 3	Developers should have a seat at the table. There is technical and construction information that would be useful for the developer to share in initial conversations
Developers	2. State Processes & BOEM	Reflected in Sections 3 and 4	Standing up a state process before or concurrently to a BOEM process will be useful and helpful.
Developers	2. State Processes & BOEM		I am unsure about how much a BOEM process can be changed. The meetings can be run slightly differently in an effort to make people feel heard, but the process probably cannot change that much, and there will always be stakeholders that do not want offshore wind at all
Clean Energy	3. Public Trust, Respect, and Transparent Engagement		There still needs to be 101-level educational content and process that happens in communities, both locally and within clean energy especially regarding transmission lines and the entire package of offshore wind deployment.
Clean Energy	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3, Recommendations 4 and 5	Who is looking at the whole picture? What community benefits are possible?

Clean Energy	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3, Recommendations 4 and 5	Coastal communities cannot be the sacrifice zones for offshore wind. There needs to be local benefits for communities.
Clean Energy	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7, Transparency, inclusivity, trust, and meaningful engagement guidelines	BOEM needs to continue to work on transparency issues, and it's hard to make people feel engaged if they aren't decision makers.
Clean Energy	3. Public Trust, Respect, and Transparent Engagement		Avista's low income advisory board process is a good example of a clear and consistent process. This advisory group addresses all feedback received, replies quickly, and follows through on promises to revisit topics.
Clean Energy	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3, See Recommendations 4 and 5	Expectations around community benefits are too high. California showed that timelines for community benefits are longer than expected and farther into the leasing process.
Clean Energy	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 3	a clear offering and plan in the buildup of transmission will help communities understand benefits from development of offshore wind.
Clean Energy	3. Public Trust, Respect, and Transparent Engagement		Processes need to allow for friction and allowing people enough time to get through the issues. It should include a diversity of stakeholder perspectives, including the "hell no" perspectives.
Clean Energy	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 3 and 5	Processes should provide funding opportunities for under resourced tribes in order to develop transparent processes
Clean Energy	3. Public Trust, Respect, and Transparent Engagement		<u>OCEAN is an important cross-constituency, locally based effort that is well worth looking at as a model for community engagement</u>
Clean Energy	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7, Transparency, inclusivity, trust, and meaningful engagement guidelines	BOEM's #1 issue is the transparency issue—BOEM isn't providing enough information back to stakeholders and communities.

Commercial Fishing	3. Public Trust, Respect, and Transparent Engagement		BOEM meetings have had so many issues: they arrive late, staff leave during the public comment, they don't issue an environmental impact statement (EIS) first; the process is not transparent and discounts fishermen and coastal communities.
Commercial Fishing	3. Public Trust, Respect, and Transparent Engagement		BOEM's time constraints have repeatedly stood in the way of understanding what industrialization of the ocean may or may not bring.
Commercial Fishing	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3 Summary of Washington Interviews and Synthesis of Research, See Recommendation 7	Fishermen have written hundreds of pages of public comments and letters through various venues. BOEM, developers, and decision-makers should read these documents before asking 'what do you want'
Commercial Fishing	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	BOEM does not respond to public comments or letters that have been submitted in prior processes
Commercial Fishing	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 2	There are mixed opinions about the level of trust in NOAA and the Department of Interior to conduct scientific research given their connection to BOEM. Fishermen have trust in the ability of these organizations to conduct rigorous science, but are concerned/do not have trust in the ways in which these organizations may be influenced or directed by federal policy positions supporting offshore wind.
Commercial Fishing	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3, See Recommendations 2, 3, and 5	Washington should start its own process/efforts exploring the data gaps/unknowns before a BOEM process kicks off. These gaps should be understood/explored prior to a BOEM planning/leasing/siting/building process
Commercial Fishing	3. Public Trust, Respect, and Transparent Engagement		Fisherman request status quo regarding BOEM = no discussion of offshore wind development off the Washington Coast with BOEM at this time
Commercial Fishing	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3	Lack of trust that BOEM will respect Washington leadership/decision-making in a leasing process.

Commercial Fishing	3. Public Trust, Respect, and Transparent Engagement		US Coast Guard meetings on vessel traffic fareways is an example of a good public comment processes (proposals came 4-5 meetings into the process)
Conservation	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3, 4 and Appendix B; See Recommendation 3, 5, 6 and 7	Internal conversations between stakeholders are also important—process should create opportunities for dialogue
Conservation	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3 and 4; See Recommendation 3, 5, 6 and 7	Inclusivity = discussion priorities first and community values and then looking into least conflict siting, similar to utility-scale solar process
Conservation	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3, 4 and Appendix B;	best practice: Frequent level-setting to address mis-information
Conservation	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3, 4 and Appendix B;	best practice: Equal and available access to information
Conservation	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3, 4 and Appendix B; See Recommendations 3 and 5	best practice: Planning process and roadmaps are useful tools to share information
Conservation	3. Public Trust, Respect, and Transparent Engagement		best practice: Webinars or information posted on websites is a good way to share information
Conservation	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3, 4 and Appendix B	best practice: Data portals and data access is important
Conservation	3. Public Trust, Respect, and Transparent Engagement	Reflected in Section 3 and 4; See Recommendation 3 and 7	best practice: Starting a process early and bringing in all stakeholders will lead to more comprehensive and more productive conversations
Conservation	3. Public Trust, Respect, and Transparent Engagement		best practice: Providing information and education before asking the public/stakeholders to weigh in formally
Conservation	3. Public Trust, Respect, and Transparent Engagement		best practice: Washington should provide funding/monetary support to advisory councils or other stakeholders on decision-making bodies.
County Government	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Beyond direct county government partnership involvement, BOEM and the state should look to partner with natural community partners like libraries, League of Women Voters, or community foundations who already work to engage communities on important issues.

County Government	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	BOEM and the state should consider different needs of different audiences for their presentations and strategy for community engagement. For elected officials, focus on process and strategies. For public, focus on broad understanding and education
County Government	3. Public Trust, Respect, and Transparent Engagement		Current trends of people being less likely to show up to meetings organized by the government. The public is more interested in sharing opinions and talking than in education and learning
County Government	3. Public Trust, Respect, and Transparent Engagement		There is a trend toward lower levels of trust in governments of any level, but people are still reaching out to local elected officials.
County Government	3. Public Trust, Respect, and Transparent Engagement		Optimistic and hopeful that efforts to keep trying to engage local communities and impacted groups will be fruitful. State/ BOEM should be creative while recognizing that we're starting with a low level of trust in government.
County Government	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	In a one-hour meeting, let people talk first before hearing presentations, or limit upfront presentation time to 3 minutes to allow people an opportunity to share their thoughts and opinions early in the meeting. The first 30 minutes of a meeting should be spend doing nothing but listening.
County Government	3. Public Trust, Respect, and Transparent Engagement		Communities need 6-12 months processes to be brought into controversial conversations, like those about offshore wind, though some may think that's still not enough time or enough space for individuals to participate in processes.
County Government	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	It means something to have decision-makers physically present in the room. This communicates commitment to showing up and communicating and listening to the community.

County Government	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	There are some facilitators who can do hybrid meetings well, but these skills don't occur easily and BOEM and state should lean on professional facilitators to organize and structure hybrid conversations.
County Government	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Meaningful/transparent/inclusive means making people aware of opportunities and using a variety of channels to learn about those opportunities as well as provide input. It also means giving people enough time to engaged and then using the same channels to provide feedback and next steps/updates about decisions and why decisions were made a certain way.
County Government	3. Public Trust, Respect, and Transparent Engagement		Getting public engagement is difficult. People seem more inclined to post on social media, instead of showing up to public meetings
County Government	3. Public Trust, Respect, and Transparent Engagement		Social media (Facebook, X, others) are useful for sharing notices and announcements. These notices should be shared without the ability to post comments to avoid online debates.
County Government	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Chambers of commerce, fishing clubs, tribes, local cities, and county commissions should all share notices through their channels to increase engagement. Working with these organizations will increase meaningful engagement and trust.
County Government	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Local newspapers, social media, and radio are all communication channels that should be used to communicate information.
County Government	3. Public Trust, Respect, and Transparent Engagement		There will always be a minority of people who will say there was not enough notice given or that they were unaware of meetings and processes occurring
County Government	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	The people that will be most impacted by a decision or process should be the first people to know about the decision or process
Labor	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Creating relationships takes time

Labor	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	How can labor meaningfully engage in this process? What outcomes can labor influence or shape?
Labor	3. Public Trust, Respect, and Transparent Engagement		There is limited capacity from labor organizations, and concern about how much time should be spent on a process for a process?
Local Government	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 3	There is confusion and lack of transparency about the end goal. The state needs to clearly articulate its goals.
Local Government	3. Public Trust, Respect, and Transparent Engagement		There should be consideration between addressing communities of place and communities of interest in future processes.
Local Government	3. Public Trust, Respect, and Transparent Engagement		There should be trained people to help with communicating complex topics to the community.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement		Zoom and hybrid meetings are a useful tool that will help with reducing barriers to participation.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Timing of meetings is still important. People need to be able to attend after work or between fishing seasons.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Public comment periods seem outdated, with little opportunity for a back-and-forth dialogue
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement		There should be agreements and use of transcripts and notes, so there are not later disagreements about hearsay
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Who is making the final decision and how they are influenced is a major piece of trust. We need clarity on who makes decisions and clarity on how their decisions are made.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Not asking for every decision-maker's thought to be open and out there, but decision-makers do need to be transparent about the processes they're going through, timelines, where they are in the process, and how decisions are being made.

Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Diversity of viewpoints is helpful and inclusive, but decisions won't be made around easy metrics. Decisions will be more subjective, particularly in weighing the voices of some over others. Decision-makers need to be clear about their choices and reasonin
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement		Questions should be asked like: What voices should be heard and elevated? Is a marina owner who is a local employer equal to someone who visits the coast twice a year to surf?
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 3, 5, and 7	Impacts can be real or perceived, but both should be considered
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	Reflected in Sections 3 and 4	Transparency is BOEM's number 1 issue.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement		BOEM needs to engage with the public, currently it does not.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement		Stakeholders are not clearly defined. There seems to be equal weight given to someone who is less impacted compared to someone whose livelihood and lifestyle are centered around water access.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	Reflected in Sections 3 and 4; See Recommendation 7	BOEM's process seems to be a 'check-the-box' exercise where the entity receiving the input has no requirement to use or convey anything heard
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement		There are no minority reports or reports to the legislature or reports to any other oversight body.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	Reflected in Sections 3 and 4; See Recommendation 7	A genuine, well-thought-out process and use for public feedback would be helpful.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement		Stakeholders should be segmented and prioritized in processes by how much the stakeholder is gaining or losing from the process.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement		The coastal communities will bear many losses and little gains.

Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 3 and 5	The jobs from offshore wind will not come to the coast, they will go to places like Seattle and Bremerton
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 3 and 5	Offshore wind will cause the local community to lose jobs, as offshore wind will cause losses to fishermen and the industries that support fishermen
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 3 and 5	Power generation is not enough of a benefit to the community.
Marine Resources Committees	3. Public Trust, Respect, and Transparent Engagement		Early access to information is important, for example websites with updated details on process and information.
Maritime	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 3, 5, 6, and 7	A process should have actual discussions and engagement early on in the process. Meeting with stakeholders early on and gathering the information in a discussion based format will allow people to understand the issue more.
Maritime	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 3, 5, 6, and 7	Starting at decision proposals and then asking for comments on those proposals is not a good process. Instead, processes should start with open discussions with stakeholders first.
Maritime	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 6 and 7	Intergovernmental task force representative appointments should be well understood, and include specific rationale about why an individual was appointed
Maritime	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 3, 5, 6, and 7	Involvement needs to be broad. For maritime, tug and barge and deep draft are key players in the offshore environment. One voice can't necessarily speak for all interests.
Maritime	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 3, 5, 6, and 7	The Washington Maritime Federation should be invited and involved. This federation represents shipyards, workforce development, labor, and other interests
Ports	3. Public Trust, Respect, and Transparent Engagement		Port modernization project demonstrates what port believes is the (growing) future of fishing

Ports	3. Public Trust, Respect, and Transparent Engagement		The Westport Marina is one of our 7 lines of business, and while we are very keen to our fishermen's interest in and concerns regarding offshore wind development, we also have the same interest and concerns when it comes to our largest line of business which is our marine terminals and any potential impacts on ocean shipping
Ports	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Large-scale projects that go through the EIS process in WA State are required to address all comments received. Even if offshore wind isn't subject to our state SEPA process, addressing concerns and questions about a potential offshore wind project that would be considered very large scale, should be required.
Ports	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 3	Port of Grays Harbor is in a rural area centered around Westport, the coast line is 35 miles, a tight footprint, and we don't know what the footprint of offshore wind development will be and how that fits into fishing and considerations of foreign vessels.
Ports	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 6 and 7	Our port commissioners are elected, and so they'd have representation at the table through the port if the port were included in a task force. If you open up an advisory body to everyone, that's too many cooks in the kitchen, but providing opportunities for public comment is helpful. Every community is unique, but if you had all our cities, ports, and counties represented in a task force, and the tribes that should be sufficient..
Ports	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Public comments need to be addressed, but there are challenges with large-scale numbers of comments. BOEM using a "frequently asked question" page or responding to common questions would go a long way in showing response and acknowledgement of public comments.

Ports	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	There should be presence in the community, given the long-timeframe of this project and the major impacts that will be felt in coastal communities.
Ports	3. Public Trust, Respect, and Transparent Engagement	See Recommendation 7	Meaningful, transparent, inclusive means town hall meetings — a meeting with a presentation, what the issue/project is, what it looks like; a meeting open to the community to come and listen to a presentation and to listen to what the facts are and everyone has a chance/opportunity to engage.
Ports, Local Government, and Economic Development	3. Public Trust, Respect, and Transparent Engagement		Processes to-date have forced people into adversarial positions—what can be done to shift that?
Recreational Fishing	3. Public Trust, Respect, and Transparent Engagement	Reflected in Sections 3 and 4	It is clear where BOEM and President Biden's priorities are, which creates an underlying lack of credible engagement with coastal areas, fisheries, local governments because there is a feeling of a predetermined outcome
Recreational Fishing	3. Public Trust, Respect, and Transparent Engagement		Relationships between BOEM and local communities are strained after the Oregon process
Recreational Fishing	3. Public Trust, Respect, and Transparent Engagement	Reflected in Sections 3 and 4; See Recommendation 7	Transparency means processes become more open to stakeholders and communities so that they can see/understand how decisions are made and who is making them.
Research	3. Public Trust, Respect, and Transparent Engagement		BOEM has made blanket statements that there will be no fishing allowed in offshore wind lease areas. This is a harmful blanket statement to make, and contrubutes to reflexive conflict with fishermen and industry. BOEM does not seem to understand how damaging these conversations are in public engagement.

Research	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 3 and 5	On the east coast, there was strong opposition from local communities who rejected offshore wind, to the extent that they didn't want to engage in benefit conversations. Then, when offshore wind developments moved forward, the communities then received little/no benefits because they did not design those benefit conversations into the process.
Research	3. Public Trust, Respect, and Transparent Engagement	See Recommendations 3 and 5	Education and knowledge for communities is important. State should avoid the issue of development lacking community benefits/commitments and ensure that discussion is part of a process.
Commercial Fishing	4. Environmental Impacts	Reflected in Section 3	Washington is unique in the nation in terms of Tribal Treaty Rights, the marine sanctuary, and other unique situations. All these unique qualities put constraints on where offshore wind could even be located. The Washington Coastal Marine Advisory Committee looked into the marine spatial plan and could not identify an area without an existing use conflict. Developers have no respect for public use.
Conservation	4. Environmental Impacts		NRDC is interested in seeing offshore wind responsibly developed on the western coast
Local Government	4. Environmental Impacts	See Recommendation 3	If there are issues with onshore wind turbines and migratory birds, why are we pursuing offshore wind, which will affect seabirds?
Marine Resources Committees	4. Environmental Impacts		There would be less environmental impacts if the location of these turbines was the hardened ocean floor before the continental shelf drops off.
Maritime	4. Environmental Impacts	See Recommendations 3, 5, 6, and 7	The environmental community will have comments on mitigating underwater noise, marine mammal impacts, frequency of blade rotations and seabirds.

Recreational Fishing	4. Environmental Impacts	See Recommendation 2	Benthic habitat piece is important. Magnuson-Stevens Fishery Conservation and Management Reauthorization Act of 2006 has generated a huge amount of work to track data. There are many areas that are well mapped and show sensitive habitats, especially corrals.
Research	4. Environmental Impacts		The Olympic National Marine Sanctuary's primary mandate is resource protection.
Research	4. Environmental Impacts	See Recommendation 2	There is the need to compare offshore wind impacts to the massive impacts climate change is already having on these ecosystems. This is a balance and scale issue.
Commercial Fishing	5. Local Community	Reflected in Sections 3 and 4	We feel like our voice is not significant in this process and that is frustrating. Our industry is providing sustainable protein and jobs for individuals and communities on the coast and in small towns
Conservation	5. Local Community	See Recommendation 7	Coastal local communities are isolated, and communication is harder. There are limited places to solicit feedback. Some ideas include: radio, newsletter, social media
County Government	5. Local Community		There is deep skepticism in the community about industry plants in the community, stemming from the proposed nuclear plants that were to be built on the peninsula. Any local engagement or representative for offshore wind needs to be transparent about their affiliations and job
Labor	5. Local Community		Labor interests often overlap with local community and economic development advocacy. There is a common link between labor using their recognition to represent the communities where workers are living
Local Government	5. Local Community	Reflected in Sections 3 and 4	WA coastal communities are natural resource-drive. Fishing and logging are the two biggest industries out here, and fishing is now making more money than logging. There is uncertainty in how OSW would impact these two industries

Ports, Local Government, and Economic Development	5. Local Community		The impacts of offshore wind on people, fishing, commerce, etc., will be large. Participants skeptical that this would be good for their communities and are largely opposed to offshore wind development off the Washington coast.
Recreational Fishing	5. Local Community	See Recommendation 3 and 5	The coastal communities will face a disproportionate burden
Recreational Fishing	5. Local Community	See Recommendation 2	Washington has 135 miles of coastline, but 100 miles of this is in Tribal fishing areas, which leaves the southern 35 miles for any recreational fishing
Research	5. Local Community	See Recommendations 3 and 5	From a socio-economic perspective, mitigation needs to be part of the conversation, given the fact that burdens are often concentrated in rural areas and the benefits leave coastal communities
Clean Energy	6. Data gathering & gaps & research	Reflected in Section 3, Considerations Unique to Washington and Summary of Washington Interviews and Synthesis of Research, and Recommendation 3	The state needs to do an Energy Strategy update and lead on articulating why there would be a need for offshore wind from Washington.
Clean Energy	6. Data gathering & gaps & research	See Recommendation 2	There is a large amount of data already collected, and there should be a plan and approach on how this data is compiled and utilized.
Clean Energy	6. Data gathering & gaps & research	See Recommendation 2	Engaging with the University of Washington and securing dedicated funding will be crucial in developing offshore wind research
Clean Energy	6. Data gathering & gaps & research	See Recommendations 2 and 3	Data gathering needs to address gaps in impacts to fisheries and marine protected areas, impacts on labor and jobs, and shipping routes, broken into sub sectors to accurately capture routes of deep sea ships and tug and barge ships
Commercial Fishing	6. Data gathering & gaps & research		A more careful approach would be pausing for 3-5 years as the California projects operate in order to shift from relying on models to actual data and experience

Commercial Fishing	6. Data gathering & gaps & research	Reflected in Sections 3 and 4	BOEM should consider evaluating the impact of buildout on the Pacific Coast in a holistic manner, rather than through state-by-state approach. The waters off the coast are all part of the California Current Ecosystem, and effects will be felt across the three coastal states.
Commercial Fishing	6. Data gathering & gaps & research		Crabs migrate 200+ miles, impacts from offshore wind will create broad changes in offshore and on-shore fisheries
Commercial Fishing	6. Data gathering & gaps & research	Reflected in Sections 3 and 4 and Recommendation 7	EIS/PEIS for full West Coast to understand all impacts on the entire California
Commercial Fishing	6. Data gathering & gaps & research	Reflected in Sections 3 and 4	Fish stock assessments will be very impacted by putting immovable structures in the ocean. Impacts to stock assessment studies will change the data and information that the fishing industry relies on for population estimates and allowable fishing quantities
Commercial Fishing	6. Data gathering & gaps & research		How far is the ocean going to be industrialized? 1,000 GW on both coasts?
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	How will electromagnetic fields impact species?
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Impacts to larval transport
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Is there the ability to conduct a pilot program to study impacts of offshore wind? Alternatively, can Washington wait on processes until California and Oregon buildout is complete and impacts can be realized and measured?
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 3	Need for OSW relative to state energy goals and federal energy goals
Commercial Fishing	6. Data gathering & gaps & research	See recommendation 2 and 3	NMFS, NCCOS modeling is a good step forward but should be improved. More tools coming online, larger ability to partner with WDFW and NMFS to get real time fishery information included in decision-making and modeling.

Commercial Fishing	6. Data gathering & gaps & research	Reflected in Sections 3 and 4	Several ways they can hurt fishing industry: displacement, ecosystem effects, economic side; all should be studied and no one is asking fishing industry for their perspectives
Commercial Fishing	6. Data gathering & gaps & research	See Recommendations 2 and 3	There needs to be information about all potential impacts before infrastructure is built or space is leased, not afterwards.
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 3	Update existing mapping to examine current uses and exclusions.
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	What will happen to the ecosystem when you industrialize the ocean?
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 3	State energy needs
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 3	Cost of OSW to consumers
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 3	Transmission build out needs/implications and any associated battery systems
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 3	How OSW is relevant to the climate crisis
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 3	Amount of natural resources needed to develop OSW and associated carbon costs
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Wake effects
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Upwelling
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Surface level mixing
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Larval drift/ocean transport
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Stratification
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Thermocline
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Forage effects

Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Seabird impacts, including blade collision
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Social/socio-economic impacts to coastal Washington
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Fishing production (including stock surveys)
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Impacts to ocean co-uses
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Endangered and protected species/habitat impacts
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Phytoplankton impacts
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	CLME impacts
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	EMF effects
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Impacts to marine mammals and migration
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Acoustic noise impacts
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2 and Recommendation 3	PACPARS and DOD constraints
Commercial Fishing	6. Data gathering & gaps & research	See Recommendation 2	Other biosphere/ecosystem gaps, including reference to PCFMC comments on data gaps
Conservation	6. Data gathering & gaps & research	See Recommendation 2	RWSC (Regional Wildlife Science Collaborative for Offshore Wind) is an entity that exists on the east coast composed of stakeholders, and there is desire to create a similar model in the west.
Conservation	6. Data gathering & gaps & research		Floating wind is new to the US. Washington will have the advantage of watching development on the Atlantic and off the coast of California.

Conservation	6. Data gathering & gaps & research	See Recommendation 2	There are major risks with offshore wind: entanglement, change in California Current Marine Ecosystem, unknown impact on upwelling, potential risk to primary production, effect on bats in ocean space, impact on birds and marine mammals,
Conservation	6. Data gathering & gaps & research	Reflected in Section 3 and 4	Data that is collected through this process should be available to the public. There should be a strong understanding of where this information lives and how it is used, and a good faith effort to make sure it is easily digestible. State should invest in this effort and share data
Conservation	6. Data gathering & gaps & research	See Recommendation 2	Climate change is creating impacts on the presence and abundance of species. How will offshore wind impact changes already occurring due to climate change?
Conservation	6. Data gathering & gaps & research	See Recommendation 2	Participants support the list of research needs that have been shared by partners from the fishing community, coastal recreation community and hospitality industries in small coastal towns.
County Government	6. Data gathering & gaps & research	See Recommendation 2, 3, and 7	BOEM/the state should be honest about what data gaps exist and how they are looking to understand and resolve those gaps.
County Government	6. Data gathering & gaps & research	See Recommendation 3 and 5	Make sure there is a deep understanding of taxation and revenue impact from offshore wind
County Government	6. Data gathering & gaps & research	See Recommendation 3 and 5	The west end of the county is one of the worst areas in the entire country in terms of reliability. There are a lot of people thinking about what energy resilience looks like. Unsure if offshore wind could offer a solution to this, but if there is some nexus there that would be useful to explore.
County Government	6. Data gathering & gaps & research	See Recommendation 3 and 5	Be specific and intentional about considering economic development opportunities as they relate to offshore wind. It will be important for communities to know what decisions would mean in terms of jobs, tax bases, local community colleges, and other local issues.

Labor	6. Data gathering & gaps & research	See Recommendation 3 and 5	There is a difference between the type of job it takes to build infrastructure versus the job it takes to run and maintain this infrastructure. How are job impacts going to be calculated for these communities or industries?
Local Government	6. Data gathering & gaps & research		There are a large amount of unknowns in this project, and many data gaps. The process should use information from existing OSW projects as stand-ins in the modeling, so impacts elsewhere and lessons learned elsewhere can inform WA state preparations for project specific data requests
Marine Resources Committees	6. Data gathering & gaps & research	See Recommendation 3	Why do we need offshore wind, given the reliable and cheap energy in Washington? Most of our power comes from hydroelectric, which is clean and renewable.
Marine Resources Committees	6. Data gathering & gaps & research		The number of fish caught is a metric that is used often, but the real impacts are the impact on communities and the metric of fish catch is just one representative, quantifiable aspect of impact to communities
Marine Resources Committees	6. Data gathering & gaps & research	See Recommendations 3 and 5	Community impacts will be felt before the projects make money or generate any electricity. What are the mitigation options and alternatives for communities?
Marine Resources Committees	6. Data gathering & gaps & research		What do the end of life scenarios look like for decommissioning or financial failure of a company?
Marine Resources Committees	6. Data gathering & gaps & research		What money would the state have to spend in cleanup fees, in a failure scenario?
Marine Resources Committees	6. Data gathering & gaps & research	See Recommendations 2, 3, and 4	There has not been full economic study diving into offshore wind industry benefits compared to any fishing it might displace. The shellfish industry is 20% of county GDP. The crab industry is 26% of county GDP. We cannot jeopardize 50% of the county's GDP.
Marine Resources Committees	6. Data gathering & gaps & research	See Recommendation 2	What is driving offshore wind development? BOEM's leases seem to be the primary driver.
Marine Resources Committees	6. Data gathering & gaps & research		Hydropower is not counted as renewable, but it should be counted.

Marine Resources Committees	6. Data gathering & gaps & research		Energy prices in Europe are more expensive, which makes the cost economics different than the US. We cannot compare Washington to Denmark and Norway.
Marine Resources Committees	6. Data gathering & gaps & research	See Recommendation 2	Do we need power here? How will generation in Oregon and California affect the power markets?
Marine Resources Committees	6. Data gathering & gaps & research	See Recommendation 2	NOAA should figure out the effects of upwelling and other impacts that these floating structures will cause in the marine ecosystem
Maritime	6. Data gathering & gaps & research	See Recommendation 2	WA Joint Legislative Audit Review Committee has done a number of studies and could be considered to conduct studies on potential impacts.
Maritime	6. Data gathering & gaps & research		Routing changed with fuel changes – see the emission control area and at the changes in routing best demonstrated by the AIS feeds
Maritime	6. Data gathering & gaps & research	See Recommendations 3, 5, 6, and 7	What are the risk mitigation options for shipping vessels around offshore wind facilities in extreme weather conditions? There are safety protocols and rerouting methods that help ships plan and move around severe weather systems, but that may be impacted by fixed location offshore wind
Maritime	6. Data gathering & gaps & research	See Recommendations 3, 5, 6, and 7	The Coast Guard's Port Access Study shows where the existing routes are in the ocean and should be incorporated into a decision making process impacting those routes
Maritime	6. Data gathering & gaps & research	See Recommendation 2	Is it economically or commercially viable to put offshore wind on the Washington coast?
Maritime	6. Data gathering & gaps & research		What happens if a development company closes or fails? Who is responsible for maintenance or decommissioning? Derelict vessels are an issue the maritime field is already facing.
Ports	6. Data gathering & gaps & research	See Recommendation 3	There needs to be clarity around the technology and engineering
Ports	6. Data gathering & gaps & research	See Recommendation 3	How large is the footprint of the turbines?

Ports	6. Data gathering & gaps & research	See Recommendation 3	How are these towers anchored?
Ports	6. Data gathering & gaps & research	See Recommendation 3	How and where do the cables land onshore?
Ports	6. Data gathering & gaps & research	See Recommendation 3	Are the ports deep and wide enough for these turbines and blades?
Ports	6. Data gathering & gaps & research	See Recommendation 3	There is an airfield close to the port. Will these impact that airspace?
Ports, Local Government, and Economic Development	6. Data gathering & gaps & research	Reflected in Section 3 and 4; See Recommendation 2, 3, and 7	BOEM saying it can't do studies that stakeholders/communities ask for is intransparent. These studies take place in other processes and forums (esp impact studies for land-based projects), and we need to know what the impacts will be on our marine environment. What is the likely project build out? How many MW of power? What are plans for state waters that would have to support infrastructure, etc.?
Ports, Local Government, and Economic Development	6. Data gathering & gaps & research	See Recommendations 2 and 3	How will local jobs be impacted? What/how many local jobs would be created?
Ports, Local Government, and Economic Development	6. Data gathering & gaps & research	Reflected in Section 3 and 4; See Recommendation 2, 3, and 7	We need more understanding of environmental impacts early and upfront.
Ports, Local Government, and Economic Development	6. Data gathering & gaps & research	Reflected in Section 3 and 4; See Recommendation 2, 3, and 7	We need to understand offshore wind development impacts on fleets and vessels and ports for existing/local use.
Ports, Local Government, and Economic Development	6. Data gathering & gaps & research	See Recommendation 3	Communities need to know more about the impacts of offshore wind projects on the local grid.
Recreational Fishing	6. Data gathering & gaps & research	See Recommendation 2	Cumulative impact study would be useful, we need to list specific categories to research and evaluate impacts

Recreational Fishing	6. Data gathering & gaps & research	See Recommendation 3	In BOEM process, simply using a surrogate or a proxy of commercial or charter industry is not going to accurately capture the reach and volume of recreational fishing.
Recreational Fishing	6. Data gathering & gaps & research	See Recommendation 2	What are the noise and electromagnetic impacts on ecosystems from the industrial buildout?
Research	6. Data gathering & gaps & research	See Recommendation 2	Lists of knowledge gaps regarding offshore wind listed on Tethys are most if not all relevant to Washington state.
Research	6. Data gathering & gaps & research	See Recommendation 2	There is concern about the possible impacts on upwelling.
Research	6. Data gathering & gaps & research	See Recommendation 2	What impacts will come from development in California? What are the impacts to primary production and nurseries
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4	There is concern that impacts will be discovered too late in the process to reverse or pause development or use of offshore wind facilities
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	The ability to model impacts to the California Current Ecosystem is complicated: Baseline information largely still unknown. There is no single tool that can analyze these impacts. Time and effort will be needed to to understand the method and approach, and to agree upon methods and approaches before designing a study. Timing is in years, not months.
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	We at least need to know what the projects look like and where they'd be located to start studying potential impacts. This research would also take years.
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	We also need to develop a monitoring system to develop mitigation after those impacts are identified
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	There have been calls/requests for a pilot program to see the impacts. Even if this pilot isn't a turbine farm, one turbine or some type of offshore structure could be useful for developing more information.

Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	Baseline understanding of the California Current Ecosystem and impacts from OSW: Generally, physics issues are easier to understand, biochemistry issues are partially known, but biology is the most difficult to understand.
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	Can we use information from the floating structures in Europe? What can be learned from European efforts as a case study?
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	There is a lot of talk about what infrastructure is needed. What is going to happen once the energy gets onshore? It doesn't make sense that people are focused on the leasing areas, without understanding the broader impacts of infrastructure needed to bring this power onshore.
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	Transmission cables and telecommunications have some similarities, which could be an analog to look into more closely.
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	There should be a standardized suite of monitoring and observations to be conducted before and during operation on these platforms and these lease areas, with clarity on how we attribute these impacts.
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	There are studies being conducted or soon to be conducted on: passive acoustic monitoring, wave energy converter noise impacts and other anthropogenic noises, evaluating transmission scenarios, implications of OSW on Washington's transmission grid
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	Straw proposals of various OSW project buildout scenarios and transmission scenarios could be used as stand-ins to model potential impacts to the marine ecosystem and other issues in lieu of developer plans, with the caveat that these won't be perfectly analogous.

Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	Appropriate data gathering is a challenging problem. There is general incompatibility with BOEM's task and the anti-offshore wind sentiments that want studies that cannot be conducted on a reasonable timeframe.
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	The largest question is: how does offshore wind affect the California current and ecosystem interactions?
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	There is a PNNL study focused on the transmission side of offshore wind. The straw proposal from PNNL could be used as a baseline for buildout model evaluations, but BOEM would still have to decide the locations, capacity, and timelines for expected buildout
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	There is a state budget proviso for the University of Washington to study the environmental impacts of offshore wind in Washington. However, this budget proviso allocates funds from a coastal legislative district that does not want offshore wind, and the researchers who will be conducting this study are not experienced with offshore wind
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	An option is to watch and wait to see how implementation of offshore wind occurs in other jurisdictions.
Research	6. Data gathering & gaps & research		<u>4C Global Offshore Wind Farm Database And Intelligence is a great tool that shows reports, databases and online tools for the offshore wind sector and adjacent industries.</u>
Research	6. Data gathering & gaps & research	Reflected in Sections 3 and 4; See Recommendation 2	Unknown impact of turbine shape and shifts the wind patterns around turbine and onto the water
Research	6. Data gathering & gaps & research		Tidal energy space modeling has also been inconsistent, given the way that turbines impact wind currents
Research	6. Data gathering & gaps & research	See Recommendation 2	Models require simplified representation of infrastructure

Research	6. Data gathering & gaps & research	See Recommendation 2	Even if the physical process are accurately represented in the model, the next step would be to see how the physical impacts are coupled with ecosystem interaction. This requires an understanding over how animal behavior changes as a consequence of changes to physical processes.
Research	6. Data gathering & gaps & research	See Recommendation 2	Climate change creates uncertainty with general long-term oceanographic modeling. Adding multiple turbine representations into the model will take a lot of work and have a low range of usefulness.
Tribal Government	6. Data gathering & gaps & research		Comparison of WA offshore wind experience to offshore wind experience in eastern states and European nations is not valid. There are not enough common points to draw out comparisons to the WA coast. We've seen hypotheses but we haven't seen examples of how this has actually impacted communities like ours.
Tribal Government	6. Data gathering & gaps & research	See Recommendations 2, 3, and 4	Tribes own aquaculture beds, and we do not know how offshore wind will affect those beds.
Tribal Government	6. Data gathering & gaps & research	See Recommendation 2	In reading NOAA reports it seems like there are many inferences and no understanding about actual impacts of offshore wind on marine ecosystems
Tribal Government	6. Data gathering & gaps & research	See Recommendation 2	There is not a complete understanding of current events that are affecting salmon and fisheries, so why should we add in another unknown from offshore wind?
Tribal Government	6. Data gathering & gaps & research	Reflected in Section 3	Offshore wind is being positioned as green energy, but there could be many negative environmental impacts from this potential industry that can wipe out the whole coast.
Tribal Government	6. Data gathering & gaps & research		How will derelict equipment and disposal and recycling happen for equipment?
Tribal Government	6. Data gathering & gaps & research	See Recommendations 3 and 5	Real estate prices are already climbing dramatically, 100-200% increases in some areas. How will the community and area handle more construction and development and influx of people? There will be benefits to people moving to the area, but not all people will feel benefits

Tribal Government	6. Data gathering & gaps & research	See Recommendations 3 and 5	There have been statements made from developers about 'employing tribal youth' in industry, but there has to be youths who want to work in the industry
Tribal Government	6. Data gathering & gaps & research	See Recommendation 2	It will take years to conduct the right studies to gauge impacts on the marine ecosystem.
Tribal Government	6. Data gathering & gaps & research	Reflected in Sections 3 and 4	What impacts will happen to commercial and recreation fishing? The commercial and recreational fishing communities will be loud voices with many concerns.
Tribal Government	6. Data gathering & gaps & research	See Recommendation 2	There needs to be more research done on passive acoustic monitoring.
Tribal Government	6. Data gathering & gaps & research	See Recommendation 2	How will offshore wind impact whales? There was recently a mass stranding event with gray whales.
Tribal Government	6. Data gathering & gaps & research	See Recommendation 2 and 3	How will the cables come onland? What are the economic and development impacts from landing scenarios?
Tribal Government	6. Data gathering & gaps & research		The local port has not been dredged or used for commercial landing sites. Dredging will cause impacts on shellfish and aquaculture beds.
Tribal Government	6. Data gathering & gaps & research	See Recommendation 2	What are the impacts of offshore wind upriver and on land? Offshore wind development will impact areas beyond the ocean.
Developers	6. Data gathering & gaps & research		There should be recognition and distinction between stakeholder and tribal groups and the technical researchers. The technical researchers should identify the data gaps and research needs, and share that with the broader group in any process
Developers	6. Data gathering & gaps & research	See Recommendation 2	Care should be taken to identify data gaps, but we should not fall into decision paralysis. Technical experts should identify the important areas of study and research. We cannot study everything for 20 years
Developers	6. Data gathering & gaps & research	See Recommendation 2	There will never be complete consensus around issue areas and studies. The technical experts can present and use feedback from stakeholder and tribal groups to inform and include, however.
Clean Energy	7. Industry/Other		There was a question about the definition of impacted community and a note that while fishermen and tribes are important, there should also be consideration of port communities, local communities, and communities in eastern Washington.

Clean Energy	7. Industry/Other	Reflected in Section 3, Considerations Unique to Washington and Recommendation 4	The January freeze in this region highlighted issues with our grid reliability. Hydro power in the region is variable, and the PNW needs a more stable backup
Commercial Fishing	7. Industry/Other	Reflected in Section 3	Basic tenant: Goal to see fishing industry off our cost in perpetuity. Access for young people is important and costs of getting into this industry/making a living are large. [x2]
Commercial Fishing	7. Industry/Other	Reflected Section 3 and 4	Concern about BOEM's short timelines, expressed need for a slow process with enough time to learn
Labor	7. Industry/Other	See Recommendation 5	Federal dollars being used to develop industry are a focus, and labor interest want to make sure the jobs being developed are good jobs with proper representation
Maritime	7. Industry/Other	See Recommendations 3, 5, 6, and 7	From the association's perspective, OSW would create risk for ocean users, and impact ship routing perhaps making transits less efficient (rerouting around issues could use more fuel). This would affect tug and barge as well as deep draft vessels. The Coast Guard Pacific Port Access Route Study reached an outcome to provide order and predictability. It is unclear whether BOEM supported the expediting of that study in order to facilitate more comprehensive consideration of ship routing issues while address safety concerns
Maritime	7. Industry/Other		Predictability in routing allows vessels to plan their routing and have safety measures in place. Fixed facilities like a wind farm will change routing measures, and create the need to provide proper buffers and safety margins.

Maritime	7. Industry/Other	See Recommendations 6 and 7	Recommend that BOEM reach out to PMSA with ocean carrier members as well as marine terminal operators that depend on predictable ship schedules to plan berth windows and operations. In addition there is American Waterway Operators (tug and barge), cruise association (CLIA) and fishing groups. As mentioned previously, the Washington Maritime Federation should be invited and involved as the board/members cut across several sectors with members like PMSA, AWO, shipyards, workforce development, labor, and other interests
Ports	7. Industry/Other	See Recommendation 3 and 5 and 6	The area around Grays Harbor is under Coast Guard jurisdiction out of Portland, despite being in Washington. The Coast Guard will need to be involved in any future processes.
Ports	7. Industry/Other	See Recommendation 3 and 5 and 6	The Department of Defence has a restricted zone off of the peninsula. The DOD will have restrictions about use cases, and may restrict height, anchoring, and the footprint of the structure.
Ports	7. Industry/Other	See Recommendation 3 and 5	There is a tight footprint around the port. Where and how will the additional infrastructure be built into this area?
Ports	7. Industry/Other		The Westport Marina is the number one commercial seafood landing port in the state, and the ninth largest in the country. Fishing is a very important part of the community.
Ports	7. Industry/Other		The Port of Grays Harbor takes their relationship with fishermen and seafood processors seriously, and wants to know how these industries feel about offshore wind before making any decisions.
Ports, Local Government, and Economic Development	7. Industry/Other	See Recommendations 3 and 5	The state should stand up for Washington/American jobs (will offshore wind projects/analysis use foreign vessels or U.S. flag vessels?)

Ports, Local Government, and Economic Development	7. Industry/Other	See Recommendation 3	The state should stand up to reserve port space for local communities and industries (existing uses, especially fishing)
Tribal-led organization	7. Industry/Other		ATNI will not take a stance on offshore wind unless directed to by member tribes.
Tribal-led organization	7. Industry/Other		The main job of ATNI is to uphold laws and orders about engaging/consulting with Tribes, disseminate information and highlight needs, and make sure that priority issues are addressed.
Tribal-led organization	7. Industry/Other		ATNI has also been used as a go-between to pass along comments from member tribes without attribution.
Tribal-led organization	7. Industry/Other		ATNI is open to helping Gridworks and state government connect to Tribes, and shared contacts during the meeting
Conservation	8. Gridwork's WA OSW engagement process		Participants asked questions about Gridwork's interactions with BOEM. Gridworks shared they are communicating but not coordinating with BOEM
Local Government	8. Gridwork's WA OSW engagement process	Reflected in Section 1 and 2	This engagement process timeline is tight. This seems rushed given the governor's office will turn over at the end of the year.
Ports	8. Gridwork's WA OSW engagement process	Reflected in Section 1 and 2	January to June is a tight timeline. What is the driving force behind this?
Ports	8. Gridwork's WA OSW engagement process	Reflected in Section 1 and 2	There are concerns about this timeline, and worry about the exclusion of any people or groups. This process is happening too quickly for something that is aimed at being comprehensive and broad.
Ports	8. Gridwork's WA OSW engagement process	Reflected in Section 1 and 2	This engagement process should be longer.
Recreational Fishing	8. Gridwork's WA OSW engagement process	Reflected in Section 1 and 2	Concern about truncated timelines for Gridwork's process, given data gaps and significant uncertainties

Tribal Government	8. Gridwork's WA OSW engagement process		Even if there is limited response back for outreach processes, you need to find some way to speak to communities and get their perspectives. It is difficult to create a process and report if you cannot get everyone to the table.
Tribal Government	8. Gridwork's WA OSW engagement process		We have concerns over how public these meetings actually are conducted, if our staff has not heard about any of the meetings already conducted.
Tribal Government	8. Gridwork's WA OSW engagement process	Reflected in Sections 1 and 2	Who has Gridworks reached out to and how was the invitation list identified?
Commercial Fishing	8. Gridworks OSW Process	Reflected in Section 1 and 2	There is concern that this engagement process with Gridworks is too short for a thoughtful and informed outcome.
Commercial Fishing	8. Gridworks OSW Process		Some expressed disappointment in the tone/tenor of Gridworks' takeaways related to OSW development in other states, describing them as diluted and milquetoast—not representative of depth of concern from the fishing industry.
Commercial Fishing	8. Gridworks OSW Process	Reflected in Section 1 and 2	Worried about what we are going to get out of this Washington project given the timeline we've been handed.
Commercial Fishing	8. Gridworks OSW Process		Want to engage in this Washington effort productively, but it will be hard.
Ports	9. Tribal Engagement and Impacts	Reflected in Sections 3 and 4	The Tribes will be impacted, and should be heavily involved.
Tribal-led organization	9. Tribal Engagement and Impacts	Reflected in Sections 3 and 4	Tribes should be engaged early and often.
Tribal-led organization	9. Tribal Engagement and Impacts		Sometimes all the information from the government consultations doesn't get disseminated into the tribal community. There should be presentations directly for the community.

Tribal-led organization	9. Tribal Engagement and Impacts		One Tribe has been working on a project to land ocean fiber cables just south of the reservation. This is a tribe-led connectivity project that has been happening for over 6 years. There was a noticeable shift around year 3, where engagement switched from asking questions into making decisions and taking action. It has been controversial within the community, so this demonstrates the level of controversy that landing offshore wind cables could generate.
Tribal-led organization	9. Tribal Engagement and Impacts		If tribes ask for extensions within processes, it would be meaningful for those extensions to be granted and respected to help create meaningful engagement
Tribal-led organization	9. Tribal Engagement and Impacts	See Recommendations 4 and 7	If the tribes are asked to discuss issues and provide comments, and they provide specific comments and concerns but those comments are not addressed or taken into account, that then creates the feeling that the consultation amounted to a check-the-box exercise and wasn't truly meaningful
Tribal-led organization	9. Tribal Engagement and Impacts	Reflected in Sections 3 and 4	Transparent means actually answering questions and that an end result from a decision-maker is negotiated at least to some extent.
Tribal-led organization	9. Tribal Engagement and Impacts	Reflected in Sections 3 and 4	Pre-decisional engagement is important. The Tribes must be engaged before any process is started, and there must be clear information about how offshore wind is going to affect the tribes, treaty rights, cultural resources, and traditional properties
Tribal-led organization	9. Tribal Engagement and Impacts		Government-to-government meetings should share meeting notes back after meetings, like Gridworks is doing in this process, to ensure accurate understanding. Even better: meetings should end with a verbal confirmation/discussion of important takeaways.
Tribal-led organization	9. Tribal Engagement and Impacts		The Chehalis Basin Strategy is a good example of an engagement process. When there was an attempt to develop a dam, the tribe opposed it and the state listened to that and did not build a dam.

Tribal-led organization	9. Tribal Engagement and Impacts	Reflected in Sections 3 and 4	Government-to-government conversations are required, and there is also value to having all parties together in one room to have conversations. However the government-to-government requirement is between one federal/state government and one Tribe. Government-to-government is not accomplished through a meeting with multiple tribes.
Tribal Government	9. Tribal Engagement and Impacts		The tribe is already moving uphill due to sea level rise and coastal erosion. Tides, currents, and sea level rise are already impacting the tribe and our shores.
Tribal Government	9. Tribal Engagement and Impacts	Reflected in Section 4	Tribal staff is asked to be point of contact for efforts like these, however we have full time jobs and responsibilities in addition to these asks
Tribal Government	9. Tribal Engagement and Impacts	Reflected in Section 4	Tribes need to start finding grants and money to get studies started, and we hope that this slows down the freight train of the BOEM process. Conducting the data studies and research will be a big task, and we want to work with other tribes to lead on these studies
Tribal Government	9. Tribal Engagement and Impacts	Reflected in Section 4	BOEM needs to help tribes fund experts to engage in these conversations.
Tribal Government	9. Tribal Engagement and Impacts	Reflected in Section 4	State or Dept of Commerce and BOEM should include funding to help tribes engage in this process more readily.
Tribal Government	9. Tribal Engagement and Impacts		How could ATNI help with capacity and convening tribes for state or federal processes?
Tribal Government	9. Tribal Engagement and Impacts	Reflected in Section 4	Appreciate this as engagement for developing a cohesive plan. BOEM/state individual meetings are organized, but the overall holistic process isn't organized---cohesive route for moving forward hasn't come to fruition. There are many conversations and paths that don't come together. A more cohesive plan to get voices moving forward is important.
Tribal Government	9. Tribal Engagement and Impacts		Executive Order tribes does not have fishing rights, if not a treaty tribe. Even though we have no U&A rights, we wants to be involved with offshore wind processes.

Tribal Government	9. Tribal Engagement and Impacts	See Recommendation 4	How will the Governor engage with treaty tribes and executive order tribes? It is frustrating to deal with the disparity in recognition. Tribal representation needs to be better thought out and more equal.
Tribal Government	9. Tribal Engagement and Impacts		All tribes are stewards of the land, and all adhere to guidelines with management and environmental focus regardless of whether they are treaty or executive order tribes
Tribal Government	9. Tribal Engagement and Impacts	See Recommendation 4	Executive Order tribes get left out of conversations frequently. We is working on another issues alongside treaty tribes, like salmon restoration, but has to go about efforts differently due to the difference in recognition
Tribal Government	9. Tribal Engagement and Impacts	Reflected in Sections 3 and 4	Tribes are stewards of the land and water, and everything is connected to these responsibilities
Developers	9. Tribal Engagement and Impacts	Reflected in Sections 3 and 4	Tribal outreach should happen early and often
Developers	9. Tribal Engagement and Impacts		BOEM feels that the developers should begin outreach with tribes, but the tribes do not want to engage with developers before leases are established
Developers	9. Tribal Engagement and Impacts	Reflected in Sections 3 and 4	Tribal staff are resrouces strapped, they do not have the capacity to read the 1000 page documents from BOEM and developers and make unformed decisions in short timelines
Developers	9. Tribal Engagement and Impacts	Reflected in Sections 3 and 4	Tribes do not want to be grouped together and gathered in large convenings. They are not homogenous, and should be met with one on one.
Clean Energy	9. Tribal Impacts		Non-federally recognized tribes in the areas should be recognized in outreach efforts. Handling inter-tribal politics is going to be an important part of any future process.
Commercial Fishing	9. Tribal Impacts	Reflected in Sections 3 and 4	Washington Tribes are our comanagers in the state. All Tribes in Washington will feel the effects of offshore wind, not just the four coastal Tribes.

Conservation	9. Tribal Impacts	Reflected in Sections 3 and 4; See Recommendation 3, 4, 5, 6, and 7	Tribal engagement is a key piece in creating a transparent and respected process
Conservation	9. Tribal Impacts	Reflected in Sections 3 and 4; See Recommendation 3, 4, 5, 6, and 7	Inclusivity = taking time to meet and consult with each Tribe on their own timeframe—needs a lot of upfront work. Processes can move too quickly
Conservation	9. Tribal Impacts		There are many federally unrecognized tribes that should be included, as they will be impacted by these conversations and decisions.
Conservation	9. Tribal Impacts	Reflected in Sections 3 and 4; See Recommendation 3, 4, 5, 6, and 7	Inclusivity of all WA tribes is important, and time should be taken to meet and consult with them individually
Conservation	9. Tribal Impacts		Consultation isn't consent.
Conservation	9. Tribal Impacts		Tribes on the east coast and California tribes feel like they were not engaged early enough
Recreational Fishing	9. Tribal Impacts	Reflected in Sections 3 and 4	There is concern over how tribal communities will be impacted, and how tribal fishing rights will be impacted
Research	9. Tribal Impacts	Reflected in Sections 3 and 4	Tribes have been vocal and have transitioned from expressing concerns to drafting letters asking for pauses and halts until concerns regarding research and unknowns are addressed.
Research	9. Tribal Impacts		Pacific Fisheries Management Council and MPC have both written letters.
Research	9. Tribal Impacts	Reflected in Sections 3 and 4	Tribes are opposed to mitigation efforts, because you can't mitigate treaty rights or loss of culture
Research	9. Tribal Impacts	Reflected in Sections 3 and 4	Tribes want a way forward that allows them to fully understand impacts before we go forward with developing offshore wind