

April 1, 2026

Jenn Eckerle, Executive Director
California Ocean Protection Council
715 P St., 20th Floor
Sacramento, CA 95814

RE: Draft Blueprint for Building a West Coast Science Collaborative

Dear Director Eckerle,

On behalf of the undersigned organizations, we are thankful for the opportunity to submit these comments to the California Ocean Protection Council (OPC) on the Draft Blueprint for Building a West Coast Science Collaborative. We strongly support the creation of a West Coast Science Collaborative (WCSC) as an independent, regional body to advance coordinated ecosystem research and monitoring off the West Coast. Our organizations have long advocated for an objective entity that provides scientific and knowledge-based expertise to guide monitoring of the potential environmental impacts of offshore wind energy development, and we welcome this concept becoming a reality in this blueprint. We appreciate and strongly support OPC’s significant work to move this effort forward, and our comments provide suggestions to further refine the structure and initial objectives of the WCSC as laid out in the draft blueprint.

Introduction

We recognize and are grateful for OPC’s role and thoughtful oversight in ensuring renewable energy is developed in California in a way that aligns with the state’s conservation goals and

priorities, in an environmentally protective manner, with robust research and monitoring to understand and address the impacts from this emerging industry. California's leadership in protecting marine biodiversity and ecosystems in the transition to clean energy is even more important as federal priorities shift to fossil fuel development and reduce support for scientific research and environmental monitoring.

Our organizations advocate for a responsible approach to offshore wind energy development that emphasizes protection of biodiversity, cultural resources, public health, and other ocean uses. Specifically, responsible offshore wind development: (1) avoids, minimizes, mitigates, and monitors adverse impacts on wildlife and habitats; (2) minimizes negative impacts on other ocean uses; (3) includes robust consultation with Native American Tribes and communities; (4) meaningfully engages state and local governments and interested and affected parties from the outset; (5) includes comprehensive efforts to avoid impacts to underserved communities; and (6) uses the best available scientific and technological data to ensure science-based and community-informed decision making.

To meet this description, it is essential that offshore wind energy in California have strong environmental protection measures and requirements in all stages of development and planning, operations, and decommissioning. This will rely on effective and comprehensive research and monitoring to inform management and requirements in plans and permits. Identifying the science and knowledge needs, priorities, and projects will contribute to collective knowledge of the California Current Ecosystem (CCE), set expectations and provide certainty for developers, support transparency and engagement for communities, and ensure safeguards for marine ecosystems.

For many years, we have worked to support the use of best available science and advance research needed for the responsible development of offshore wind energy. As such, we appreciate the work by OPC to build the WCSC and are grateful that all interested parties have the opportunity to be involved in its development and provide feedback. Creating a WCSC now, before construction and operation plans are developed and finalized for the first floating offshore wind farms on the West Coast, is an important opportunity to clarify regional information needs, develop priorities for monitoring and research, identify standards and management plans for data, build multidisciplinary collaboration, and address other relevant issues. The WCSC presents a timely opportunity to gather information about science and research already underway and advance the comprehensive baseline monitoring needed to fill information gaps in advance of wind farm construction while working to identify and plan for future research needs.

Building a Collaborative for the West Coast

Our organizations have long advocated for the creation of a science collaborative to facilitate cross-sector coordination, guide effective multidisciplinary research, and support transparency in understanding the environmental effects of offshore wind energy projects off the West Coast.

We are pleased to see OPC moving forward with creating the WCSC, designed to fit the needs of West Coast states and achieve the goals of participants. Models like the Regional Wildlife Science Collaborative (RWSC) operating on the East Coast have provided helpful examples.¹ The RWSC has had great success in clearly identifying monitoring, data collection, and other best practices, as well as priorities for additional scientific research through the creation of its Science Plan.² It has also been a useful forum for convening parties interested in offshore wind development.

Several of our organizations have been Steering Committee, subcommittee, and otherwise active participants in the RWSC. This experience informs some of our key takeaways:

- Native Tribes hold invaluable knowledge about ocean and coastal ecosystems, and inclusion in the collaborative from the outset is necessary to ensure that Tribal perspectives are taken into account.
- We hope that the WCSC will develop a Science Plan that identifies gaps in the research and assists with strategies to fill those research gaps. We recommend that the collaborative also develop structures to ensure that any additional research projects are not duplicative, that they fill the most essential data collection needs, and make strategic use of the funding available for research.
- The RWSC has effectively convened the many parties interested in offshore wind development, including through subcommittee meetings, and providing space to coordinate about their interests and elevate priorities. We hope that the WCSC provides a similar forum. To that end, we urge the WCSC to have a member code of conduct or some other norms regarding participation to foster cordial discussion and productive participation.
- A long-term funding structure for the collaborative and scientific research must be established to ensure that the collaborative can continue its work, and we encourage OPC to develop strategies for securing such funding. One system that has been productive on the East Coast is leveraging the power procurement process as a pathway of directing developers to fund research.³ California should consider this as the state sets up its central procurement authority and as individual utilities develop plans for purchasing offshore wind power.

¹ [Regional Wildlife Science Collaborative](#)

² [Integrated Science Plan for Offshore Wind, Wildlife, and Habitat in U.S. Atlantic Waters](#)

³ For instance, in New York, successful proposers are required to commit to providing financial and technical support for regional wildlife and fish monitoring, with a minimum contribution of \$10,000 per megawatt of Offer Capacity. Similar provisions exist in New Jersey, directing funds to the state's Research and Monitoring Initiative, while Connecticut requires bidders to support regional wildlife and fish monitoring through a \$5,000 per megawatt fee to entities like the Regional Wildlife Science Collaborative for Offshore Wind (RWSC). NYSERDA, Purchase of Offshore Wind Renewable Energy Certificates Request for Proposals ORECRFP23-1, November 30, 2023. <https://portal.nyserda.ny.gov/servlet/servlet.FileDownload?file=00P8z000003cmKBEAY>; New Jersey Board of Public Utilities, New Jersey Offshore Wind Fourth Solicitation, Solicitation Guidance Document, March 6, 2024, pp. 40. <https://njoffshorewind.com/fourth-solicitation/solicitation-documents/Draft-Solicitation-Guidance-Document-with-attachments.pdf>; Connecticut Department of Energy and Environmental Protection, Request for Proposals for Offshore Wind Facilities, October 27, 2023, pp. B-12. [https://www.dpuc.state.ct.us/DEEP/Energy.nsf/c6c6d525f7cdd1168525797d0047c5bf/5f3d7ee5480fdbb085258a5500500d7c/\\$FILE/Final%20RFP%20\(2023%20OSW\)_Revised%20V3.pdf](https://www.dpuc.state.ct.us/DEEP/Energy.nsf/c6c6d525f7cdd1168525797d0047c5bf/5f3d7ee5480fdbb085258a5500500d7c/$FILE/Final%20RFP%20(2023%20OSW)_Revised%20V3.pdf)

- The RWSC's role as a neutral space for collaboration and research on offshore wind energy has been essential to its credibility. Neutrality will be equally important for the WCSC.

Strengths of the WCSC

Our organizations appreciate the consideration of our previous comments and recommendations for a science collaborative in the development of this blueprint. We recognize the extensive work undertaken by OPC and California Native American Tribes to collaborate on early input to establish the initial processes for inclusion and participation of Tribes. We support this plan and are ready to continue working with OPC, California Native American Tribes, and other Steering Committee members in further planning.

Creating a WCSC that meets West Coast needs.

We strongly support the plan to let participating members further refine and formalize the processes, long-term structural development, near- and long-term goals, and ongoing activities of the WCSC. It is important that the participants of the WCSC be able to develop the collaborative in a way that functions effectively for the participants, addresses the needs identified by Subcommittees, fulfills the goals of the collaborative, and supports transparency and accountability.

Convening expert Subcommittees.

The Subcommittee structure, similar to the Subcommittees of the RWSC, aligns with the ongoing process by OPC and the California Marine Sanctuary Foundation to develop environmental monitoring guidance. We support this structure to build on an existing framework to continue discussions in these specific topical areas. We agree that Subcommittee meetings should be open to the public, with the exception of the Tribal Cultural Resources Subcommittee, and allow participation from an array of knowledge holders to convene the best available information and input. This should include environmental non-governmental organizations (eNGOs), academic and independent researchers, scientists from state and federal agencies, Tribal scientists and knowledge holders, local knowledge experts, consultants, and others with relevant information or expertise.

WCSC is an independent, neutral, ecosystem-focused body.

We appreciate the clarification in the blueprint that the WCSC functions independently of the regulatory processes of the participating government agencies. Our organizations have consistently advocated for a neutral, science and knowledge-focused, independent body focused on ecosystem monitoring and research priorities to better understand and assess the environmental effects of offshore wind energy development. The RWSC has an indirect role in assessing mitigation, providing research and synthesis in support of better information. WCSC can have a similar role in providing neutral assessment and analysis while remaining an independent, science-focused entity; the work of the WCSC can be used to inform the

development and assessment of regulatory frameworks and management strategies to avoid, minimize, and mitigate the effects of offshore wind energy development.

Sharing information and processes with the public.

Our organizations support regular communications with the public through public-facing reports and research summaries. Offshore wind is a new industry for the West Coast and the WCSC will provide a unique opportunity to advance collective ocean knowledge – it is important for regular updates to be shared with the public to build trust in the information, accountability for the industry, and to highlight new ocean research.

Structure and Governance

Include environmental non-profits as voting members.

We are grateful the OPC has given environmental non-profit organizations/eNGOs the opportunity to participate in the WCSC, and request that the eNGO membership be involved as a voting member group on the Steering Committee with an equal number of votes (three) as other voting member groups. We note that the RWSC includes eNGOs as full, voting participants on the Steering Committee. We agree with the goal of consensus-driven decision-making in the structure of the Steering Committee and recognize the need for the WCSC to have an organizational structure that fits West Coast needs. It is encouraging that the RWSC has largely functioned in a similar consensus-driven manner and has rarely relied on its voting structure to make decisions. With the goal of deciding by consensus and using votes as a supplementary decision-making tool, a voting seat is an important reserve measure for any decisions that do require a vote.

We appreciate the opportunity to participate on the Steering Committee and add our perspective to the viewpoints represented. Our organizations have a proven record of engaging collaboratively with the state and other prospective Steering Committee members on topics related to offshore wind and ecosystem protection, and we are ready to continue that work and contribute as full voting participants.

As eNGOs with robust membership constituencies, we represent an engaged public voice from civil society concerned about the health and resiliency of the marine environment. Our views contribute supplementary perspectives alongside other participants on the Steering Committee who share similar concerns. Of the advisory bodies that have been or are planned for the development of offshore wind in California, the WCSC's specific focus on ecosystem research and monitoring is the most relevant to our expertise and interests, and is well-suited as an opportunity for continued eNGO engagement on offshore wind energy development.

The expertise of eNGOs on environmental research and monitoring is an important view to be represented on the Steering Committee, and many of our organizations have scientists on staff who contribute to collective ecosystem expertise. Alongside the knowledge, expertise, and information on existing research from federal and state agencies and Tribal representatives,

eNGOs contribute additional insight on academic and independent science as well as represent the concerns and priorities of the public. ENGOs have proficiency in navigating multi-agency regulatory and environmental assessment processes, and offer valuable context for assessing priorities for research and monitoring and advancing recommendations from the Subcommittees. Our organizations can act as a proxy for the academic sector and other interests who may be unable to participate in decision-making on the Steering Committee due to conflict-of-interest policies. With the recent decrease in federal scientists, eNGOs also have an important role in ensuring all available information is considered in decision-making and setting priorities.

By including eNGOs as a voting member group on the Steering Committee, OPC can ensure that input of eNGOs and our constituencies is fully weighed in any decisions that require voting. The eNGO community, particularly the organizations represented by these comments, has long supported and advocated for a regional science collaborative. We are deeply invested in the success of the WCSC and ensuring the collaborative achieves its goals.

Recommendations for Steering Committee membership.

The success of the WCSC may also benefit from some broadening of other sectors. For example, the current list of participating agencies excludes federal agencies such as the Marine Mammal Commission and the U.S. Geological Survey, science bodies that oversee information particularly relevant to the WCSC, along with agencies that provide additional policy oversight or conduct related research, such as the Department of Energy and the Environmental Protection Agency. Their inclusion could be beneficial to achieving stated goals.

Furthermore, we suggest that Steering Committee membership for offshore wind leaseholders in the initial phase of the WCSC consist of developers with active leases issued by the Bureau of Ocean Energy Management (BOEM) that are consistent with the AB 525 Strategic Plan, which emphasizes the following:

Offshore wind should be developed in a manner that protects coastal and marine ecosystems. The State of California should use its authority under state programs and policies to ensure (1) avoidance, minimization, and mitigation of significant adverse impacts, and (2) monitoring and adaptive management for offshore wind projects and their associated infrastructure.⁴

Future changes to Steering Committee membership should be determined by Steering Committee members. However, we suggest that OPC first establish some parameters that specify eligibility for interested developers, including: an active lease, and; lease area(s) consistent with the AB 525 Strategic Plan or similar state laws in Oregon or Washington.

Organization of participating member groups.

⁴ Assemb. B. 525, 2021-2022 Reg. Sess., § 1(m) (Cal. 2021).

Our groups appreciate the allocation of seats on the Steering Committee for eNGO representation, and we are eager to offer our suggestions for ensuring that our broad and diverse community is meaningfully represented within this body. ENGOs represent members and supporters with a wide range of perspectives and priorities, and our organizational mandates may also differ. It is therefore imperative that mechanisms are in place to reflect this diversity in Steering Committee engagement and decision-making.

On the East Coast, the RWSC addresses sector representation through the use of Sector Caucuses, with each Caucus (Federal, State, Industry, and eNGO) meeting regularly to provide input to their Steering Committee representatives. These Caucuses develop their own guidance frameworks to define membership and participation, helping to ensure that sector perspectives are communicated in a structured and transparent way.

This caucus structure supports coordination in sectors that include a broad range of expertise and areas of focus. For example, individual federal agencies may have distinct scientific and policy branches (e.g. NOAA, BOEM, Fish and Wildlife Service) that offer different perspectives on science, regulatory, and policy needs for research. A Caucus offers a forum for member groups to discuss objectives, coordinate on priorities, and provide input on key questions to their Steering Committee representatives.

We strongly recommend the WCSC establish a formal Caucus structure as well to allow member groups a structure to coordinate, share information, align on priorities, and select Steering Committee representatives through an internal process. The eNGO caucus would be empowered to elect its Steering Committee representatives, with opportunities for ongoing information sharing and coordination. Given likely capacity constraints, we understand that the eNGO community or other member groups may need to play a leading role in establishing and organizing caucuses. We welcome this opportunity for the eNGO community and recommend that the process be designed to be inclusive, transparent, and accessible, with clear pathways for participation and input across the breadth of the eNGO community.

Many of our organizations, which have been collaborating on offshore wind and wildlife in California for over a decade, are well-positioned to help support the development of this structure and ensure it reflects the diversity of perspectives across the eNGO community. For other member groups, we encourage OPC to explore opportunities to coordinate with existing systems or cooperative bodies that already hold sector or caucus organization to contribute similar support.

Initial Objectives

The WCSC is an opportunity to coordinate integrated ocean observing needs to identify, monitor, and assess the effects of offshore wind energy development on marine life and habitats. As an information-focused, neutral body, the WCSC can bring groups together to prioritize research and monitoring needs, develop and implement the most effective and efficient

research strategies, and support collection and analysis of vital information needed for responsible decision-making.

Include development of a Science Plan.

Comprehensive information is available for many species and habitats in the CCE, with ongoing, long-term data sets from projects at various scales (local, regional, ecosystem-wide). We recommend that a core objective of the WCSC, led by the topical Subcommittees, be the development of a Science Plan that can leverage existing research to identify additional knowledge needs and inform identification of priorities and development of a work plan, similar to the Science Plan developed by the RWSC. Early steps toward development of a Science Plan that could be described as an initial objective include an assessment of existing information for applicability and relevance to the WCSC, and a gap analysis that includes review of existing projects and information (for example, the results of the Passive Acoustic Monitoring Workshop, OPC's Environmental Monitoring Guidance, and numerous long-running independent, state, and federal ecosystem monitoring efforts) to identify outstanding research needs.⁵ Starting the Science Plan by clearly articulating monitoring needs and goals, priority areas, key questions, and parties participating in information collection will help streamline investments into research and monitoring.

Compile information to assess management measures.

Along with Monitoring Protocols and Best Practices documents, we recommend the WCSC also develop documents detailing mitigation strategies that are already required under BOEM's offshore wind leases, the Coastal Zone Management Act's enforceable policies and state and federal conservation laws, and applicable requirements and voluntary measures from East Coast leases. Providing a detailed document on what mitigation is already underway or will be required can be helpful for consideration by the topical Subcommittees in developing research needs and recommendations for assessing management measures to avoid, minimize, or mitigate effects from offshore wind energy. We note that the eNGO community has already developed a robust set of monitoring and mitigation strategies that we have set out in our comments to federal and state regulatory proceedings, as well as various guidelines and white papers, and we encourage OPC to reference these materials.⁶

⁵ For example: Kojima A, Reeb D, Biedron I, Peavey Reeves LP, Simonis A, Field P, Horii S, Talley S, Mohamed D. 2024. [Collaboratively developing a vision for a Pacific passive acoustic monitoring network for marine mammals: Workshop Summary – May 21-22, 2024](#). Workshop report prepared by Consensus Building Institute for the U.S. Department of the Interior, Bureau of Ocean Energy Management, Pacific Regional Office, Camarillo, CA. 37 p. Report No.: OCS Study BOEM 2024-064. Contract No.: 140D0423D0077.; NOAA's [Integrated Ecosystem Assessment](#); [Integrated Ocean Observing System](#); [California Cooperative Oceanic Fisheries Investigations](#)

⁶ Environmental Organization Comments on BOEM's Draft California Offshore Wind Programmatic Environmental Impact Statement (Feb. 12, 2025); Environmental Organization Comments on Notice of Intent to Prepare a Programmatic Environmental Impact Statement for Future Floating Offshore Wind Energy Development (Feb. 20, 2024); Environmental Organization Comment Letter re: CEC Docket Number 17-MISC-01, AB 525 Draft Strategic Plan (April 22, 2024); Environmental Organization Comment Letter re: Docket 17-MISC-01-Draft Conceptual Permitting Roadmap for Offshore Wind Energy Facilities Originating in Federal Waters Off the Coast of California (Feb. 10, 2023); *Monitoring of Marine Life During Offshore Wind Energy Development - Guidelines and*

Develop the Data and Technology Subcommittee Scope and Work Plan.

We strongly recommend that the Data and Technology Subcommittee Scope and workplan be included as an initial objective to begin the process of developing a data management plan and shared templates to compile data. Early focus on establishing data standards and processes to assess existing data is a near-term need to ensure that information is applicable for the WCSC and meets the FAIR guiding principles (Findability, Accessibility, Interoperability, and Reusability).⁷

The Data and Technology Subcommittee should also oversee data sharing practices and determine common terms to use across data collection for various research areas. This Subcommittee should also determine data governance best practices to ensure that data practices are consistent across research and that data is available in a shared catalog easily accessible online. Development of strong data governance and data management standards is a key component of RWSC's Science Plan.⁸ Identifying a platform (existing or new) to house data collection for the WCSC is a foundational, early task that we suggest be included as an initial objective. We agree that the development of Monitoring Protocols to facilitate data analysis and synthesis is an essential early step for the WCSC, and identifying an accessible repository is an important component of data management and sharing. This enables data collected by government agencies, developers, academic institutions and others to be collectively used and shared, building trust in the information and allowing for independent analyses of research questions - an added benefit of advancing collective ocean research that increases shared knowledge and encourages additional inquiries.

Planning for funding.

We appreciate the approach to allow the Steering Committee to develop a long-term plan for the structure and funding framework of the WCSC, and agree that this type of guidance and input from participants is essential to construct the WCSC in a manner that will work best for the West Coast. We suggest that an early need for development of the funding framework will be to convene a coordination group to outline how funding allocations will be determined. Starting to develop an assessment process early, with input from a range of participants, will support efficient and timely collection of information.

Evolution of WCSC

Recommendations (March 2023), https://www.nrdc.org/sites/default/files/ow_marine-life_monitoring_guidelines.pdf; Natural Resources Defense Council, *Untangling the Way Forward for Responsible Offshore Wind Energy: Recommendations to Reduce Marine Life Entanglement Risks* (Sep. 2025), https://www.nrdc.org/sites/default/files/2025-09/Entanglements_Report_R_25-08-A_05_locked.pdf

⁷ Wilkinson, M., Dumontier, M., Aalbersberg, I. *et al.* The FAIR Guiding Principles for scientific data management and stewardship. *Sci Data* 3, 160018 (2016). <https://doi.org/10.1038/sdata.2016.18>

⁸ RWSC, *Integrated Science Plan: Ch. 2, Data Governance and Data Management*, <https://rwsc.org/science-plan/>

Outline specific plans for regional expansion.

We appreciate the plan in the blueprint to allow the WCSC to develop its own evolution framework. This will be crucial in the event that more offshore wind lease areas are developed along the West Coast in the future. To achieve the vision of the WCSC to serve as an independent, regional body with equitable representation from West Coast states and interested parties, we provide the following recommendations.

We encourage the blueprint to identify specific points in time or in the advancement of offshore wind energy off Oregon and Washington at which interested parties from those states would have increased roles in the Steering and Coordination Committees. We understand that specific details may be part of the long-term planning of the Steering Committee; however, to establish the foundation of the WCSC as a regional body, we urge OPC to include a clear plan for expansion and specific benchmarks in the blueprint.

For example, at the point when Oregon or Washington invite the federal government to consider offshore wind through the formation of an Intergovernmental Task Force, prior to the Request for Information or Call for Information and Nominations, the planning process for fully integrating related state entities and interests into the WCSC should begin. This would mean that before sites are identified and the leasing process begins, interested parties from Oregon or Washington - state entities, Tribes, eNGOs, and fisheries representatives - should be participating and integrated into the WCSC. Developers would follow once leases are awarded and developers confirmed.

If additional lease areas are added in California, developers should be eligible for the WCSC as their leases are awarded. As previously described, this process should be driven by the Steering Committee within parameters established in this original blueprint, such as ensuring representation from projects with active federal leases that meet state standards for responsible offshore wind development.

Include regional representation in Subcommittees.

We recognize that there is also interest from these parties in the nearer-term effects of development of offshore wind energy in waters off California on marine resources that move throughout the CCE, including north into waters off Oregon and Washington. These concerned parties should be able to participate in topical Subcommittees to provide input on existing knowledge, information gaps, and priority research needs.

Support transparency and accountability.

To ensure fair dispersal of funds and strategic decisions related to investments by the WCSC, decisions made by the Steering Committee should be transparent to the public. We recommend

publishing written reports explaining how decisions are reached, with opportunities for Steering Committee member groups to share their perspectives.

Part of the long-term planning for funding and infrastructure needs should include guidance on using a WCSC Science Plan to make funding decisions based on the identified priorities. This guidance should include assessment of existing information and consider ways to incorporate, update, or expand upon existing research to avoid duplicative efforts and direct funds to relevant and impactful research - supporting efficiency and consistency in information collection.

In the role of fiscal oversight body for the RWSC, the Coastal States Stewardship Foundation manages funds, contracts, and grants. This provides an additional layer of oversight to ensure effectiveness and equity of funding decisions. In the initial phase of convening the WCSC, it will benefit from similar support from California Sea Grant. We recommend an early task of the Steering Committee be to determine an organization or process to oversee long-term management of funds. While specific criteria will be part of the Steering Committee process, OPC can include some requirements to guide these decisions: funding framework should avoid conflict of interest, decisions should be transparent and explained in public reports with opportunities for feedback, funding opportunities should progress through Requests for Proposals (RFPs) that allow for a wide range of projects to be considered, and the WCSC should be able to receive multiple streams of funding.

Conclusion

Securing the best available science requires continuous coordination across diverse parties, allocation of resources from various fields, and a collaborative platform for data-sharing. Designating a coordination entity to identify and prioritize science needs, and to guide and fund research, will help ensure that science conducted across all phases of siting, permitting, and operations is efficient, thorough, and interoperable. The WCSC has tremendous potential to serve West Coast states in advancing our shared understanding of the marine ecosystem and the potential effects of offshore wind energy development.

It is encouraging to see the WCSC adopt many of the RWSC's best practices while tailoring them to the West Coast context. The Regional Wildlife Science Collaborative has been recognized as a vital force in supporting the responsible development of offshore wind on the East Coast.

We are grateful for OPC's leadership in developing this critical entity as offshore wind is advanced within the California Current Ecosystem. OPC's engagement in developing the Draft Blueprint for the West Coast Science Collaborative has been both thorough and thoughtful. We are particularly impressed by the meaningful engagement of Tribes throughout the Blueprint's development and within the Steering Committee structure.

We sincerely appreciate your careful consideration of the suggestions above. Our organizations look forward to doing our part to support and participate in the WCSC. Thank you for your commitment to ocean protection and this continuing process.

Sincerely,

Amy Wolfrum
Director, California Policy and Government Affairs
Monterey Bay Aquarium

Irene Gutierrez
Senior Attorney
Natural Resources Defense Council

Shayna Steingard
Senior Policy Specialist
National Wildlife Federation

Azsha Hudson
Marine Conservation Analyst
Environmental Defense Center

Matt Simmons
Climate Attorney
Environmental Protection Information Center
(EPIC)

Mike Lynes
Director, Public Policy
Audubon California

Susan Jordan
Executive Director
California Coastal Protection Network

Jennifer Kalt
Executive Director
Humboldt Waterkeeper

Lisa Belenky
Senior Counsel
Center for Biological Diversity

Michael Stocker
Executive Director
Ocean Conservation Research

Katherine Emery, PhD
Executive Director
Santa Barbara Audubon Society

Glenn Phillips
Executive Director
Golden Gate Bird Alliance



March 27, 2026

California Ocean Protection Council
715 P St
Sacramento, CA 95814

Re: ACP-CA Comments on the West Coast Science Collaborative (WCSC) Draft Blueprint

Dear Ms. Mohan,

The American Clean Power Association – California (ACP-CA) appreciates the opportunity to provide comments on the Draft Blueprint for the West Coast Science Collaborative (WCSC). ACP-CA represents companies developing offshore wind (OSW) and other clean energy resources across California and the broader West Coast.

ACP-CA supports efforts to strengthen the scientific foundation for offshore wind planning and permitting through improved coordination among agencies, researchers, Tribes, industry, and other stakeholders. The WCSC has the potential to play an important role in advancing coordinated research and improving understanding of environmental conditions relevant to offshore wind development.

Consistent with that framework, the WCSC should focus on generating science that supports efficient permitting and responsible offshore wind development while maintaining clear boundaries regarding the scope of its work products and their relationship to regulatory processes.

ACP-CA offers the following recommendations to strengthen the Draft Blueprint.

I. Introduction and Goals for the WCSC

A. Provide Clear Background on California’s Offshore Wind Policy Goals

ACP-CA recommends that the Blueprint begin with a Background section describing the Legislature’s policy objectives for offshore wind development.

The current introduction states:

“California is committed to carbon neutrality by 2045... Meeting this ambitious clean energy goal requires a portfolio approach that includes offshore wind energy.”¹ While accurate, this language does not reflect the full policy context established by the Legislature. AB 525² recognizes offshore wind as an opportunity to:

- diversify California’s energy portfolio
- improve grid reliability and resilience
- create workforce and economic development opportunities
- strengthen seaport infrastructure and supply chains
- support long-term decarbonization goals²

In addition, the California Offshore Wind Energy Strategic Plan developed pursuant to AB 525 identifies potential strategies to achieve the state’s offshore wind goals and address environmental and ocean use considerations through avoidance, minimization, monitoring, mitigation, and adaptive management.³

The Blueprint should reflect this broader legislative intent and clarify that the WCSC operates within the framework of supporting responsible offshore wind development in California through coordinated environmental research, monitoring and analysis of potential offshore wind impacts.

B. Scope and Phasing of WCSC Goals

The Blueprint describes a wide range of potential objectives for the WCSC, including enhancing scientific expertise, coordinating monitoring, developing data standards, synthesizing research findings, and supporting mitigation and adaptive management strategies.³ ACP-CA recommends that the Blueprint clearly prioritize and phase these objectives.

Specifically, the Blueprint should distinguish between:

- core objectives, such as identifying baseline environmental data gaps relevant to offshore wind permitting; and

¹ Draft WCSC Blueprint, p. 3

² California Public Resources Code §25991 et seq. (AB 525, Ch. 231, Stats. 2021).

³ Draft WCSC Blueprint, p. 4

- longer-term “stretch” objectives, such as developing best practices for mitigation based on future research outcomes.

The AB 525 Strategic Plan emphasizes the importance of improving baseline scientific understanding to support responsible offshore wind development.⁴ The Blueprint should align WCSC core objectives with this AB 525 priority, especially given the limited funding for WCSC activities at this time.

The Blueprint should also acknowledge that “stretch” objectives are potential but uncertain outcomes of the collaborative that would require involvement of a broader range of partners, including regulators with appropriate authorities to implement WCSC recommendations, as well as additional sources of funding.

C. Clarify Statements Regarding Baseline Monitoring Requirements

The Blueprint states “California’s leases require immediate baseline data collection and monitoring protocols before construction begins.”⁵ This statement requires clarification. Federal offshore wind leases are issued by the Bureau of Ocean Energy Management (BOEM) under the Outer Continental Shelf Lands Act and are thus more appropriately referred to as “Federal leases off the coast of California.” In addition, monitoring requirements associated with offshore wind development are typically established through BOEM’s Construction and Operations Plan (COP) review process and related consultations.⁶ It is therefore unclear what authority the Blueprint is referencing. The document should clarify whether this statement refers to federal leasing requirements, state approvals for export cables in state waters, or other permitting processes.

The Blueprint further states, “The WCSC will ensure that monitoring standards are scientifically rigorous, operationally feasible, and responsive to both regulatory requirements and the information needs of the broader scientific community and other partners.”⁷ ACP-CA recommends clarifying that monitoring recommendations should:

- focus on understanding offshore wind-specific impacts; and
- consider appropriate geographic scale and temporal frequency.

⁴ California Public Resources Code §25991 et seq.; see also California Energy Commission, Offshore Wind Energy Strategic Plan, Vol. I (2023).

⁵ Draft WCSC Blueprint, p. 3

⁶ Bureau of Ocean Energy Management regulations governing offshore renewable energy development, 30 C.F.R. Part 585.

⁷ Draft WCSC Blueprint, p. 4

If the WCSC's focus is offshore wind, monitoring guidance should remain targeted toward understanding offshore wind impacts rather than establishing general regional monitoring frameworks.

D. Remove References to Adaptive Management

The Blueprint references adaptive management at both project and cumulative scales.⁸ Adaptive management frameworks can create significant challenges for offshore wind development, including uncertainty during project financing, increased regulatory risk during engineering and construction contracting, and increased litigation risk.

ACP-CA therefore recommends that the WCSC prioritize identifying baseline scientific data gaps rather than establishing open-ended adaptive management frameworks that could introduce material financial and regulatory risk.

II. Organizational Structure

A. Steering Committee

ACP-CA recommends that the Blueprint provide additional clarity regarding Steering Committee representation. Specifically, each participating group should have both a lead representative and an alternate representative. This is especially important given the fluctuations in offshore wind leaseholder teams during this time.

Additionally, ACP-CA recommends including the U.S. Geological Survey (USGS) among participating federal agencies. The USGS office in Santa Cruz includes significant expertise related to bird and bat research that may be valuable to offshore wind environmental studies.

B. Subcommittees

ACP-CA recommends considering the creation of a practicability subcommittee composed of offshore wind developers. This subcommittee could review recommendations from other subcommittees and evaluate their feasibility in real-world project development contexts.

The Blueprint currently does not fully recognize the importance of practicability when developing mitigation recommendations. Without this perspective, recommendations could evolve into best-in-class mitigation requirements that are technically feasible but

⁸ Draft WCSC Blueprint, p. 4

economically impractical. Effective environmental protection should consider both the scale and significance of impacts and the identification of cost-effective mitigation strategies.

C. Decision-Making and Voting

The decision-making framework described in the Blueprint appears complex and difficult to interpret. ACP-CA recommends a streamlined voting structure that ensures each Steering Committee stakeholder group has equal voting rights.

ACP-CA also recommends reconsidering voting roles for federal agencies, as this could overlap with established federal regulatory decision-making processes.

D. Financial Governance

The Blueprint would benefit from early development of a financial governance structure. This structure should include a fiduciary entity responsible for financial administration and oversight mechanisms to ensure transparency and accountability in financial decisions.

Establishing these governance structures early will support effective operation of the WCSC.

E. Clarify Inconsistent Statements Regarding Regulatory Use

The Blueprint states, “Although government agencies will participate in the WCSC, the work and products of the WCSC will not be included in government regulations.”⁹

However, the Blueprint also states that WCSC science may support regulatory decision-making and adaptive management.¹⁰

These statements appear inconsistent. The Blueprint should clarify the intended relationship between WCSC outputs and regulatory processes to avoid confusion regarding how the Collaborative’s work products may be used.

III. Initial Activities

A. Inventory Existing Baseline Environmental Data

ACP-CA recommends that the WCSC’s initial activities include a review of existing baseline environmental datasets and literature, in coordination with OPC and California Marine

⁹ Draft WCSC Blueprint, p. 5

¹⁰ Draft WCSC Blueprint, p. 3

Sanctuary Foundation’s comprehensive offshore wind environmental monitoring guidance, which should be finalized this year.¹¹

Developing a comprehensive inventory of available data will help identify key scientific gaps and ensure that WCSC research priorities are aligned with the most pressing needs for offshore wind permitting and environmental review.

B. Monitoring Protocols and Construction and Operations Plans

The Blueprint suggests that monitoring protocols should ideally be developed prior to submission of BOEM Construction and Operations Plans.¹² Because offshore wind projects must submit design envelopes during permitting, it may be difficult to establish detailed monitoring requirements prior to COP submission. Instead, the Blueprint should focus on identifying potential monitoring methodologies and example studies that may inform project-specific monitoring frameworks.

The Blueprint states, “By establishing monitoring protocols before construction begins, agencies, California Native American tribes, offshore wind leaseholders, and others can leverage shared resources and promote collaboration to better track baseline conditions and measure change over time.”¹³ This language could be interpreted as requiring multi-year pre-construction monitoring funded by developers. ACP-CA recommends revising this language to indicate that the WCSC may provide possible frameworks or guidance for monitoring rather than establishing monitoring requirements.

C. Fisheries Subcommittee Workplan

The Blueprint references monitoring for socioeconomic impacts within the Fisheries Subcommittee workplan.¹⁴ However, the methodology developed by Northern Economics does not include a monitoring framework. At most, the methodology could support characterization of impacts.

The Blueprint should correct this description. Additionally, given ongoing concerns regarding the methodology, ACP-CA recommends against using it as a basis for analysis outside the existing 7C process.

Conclusion

¹¹ See: [comprehensive offshore wind environmental monitoring guidance](#)

¹² Draft WCSC Blueprint, p. 8

¹³ Draft WCSC Blueprint, pp. 8–9

¹⁴ Draft WCSC Blueprint, pp. 9–10

ACP-CA appreciates the opportunity to provide comments on the Draft WCSC Blueprint. Clarifying the Blueprint's scope, prioritizing baseline scientific research, refining governance structures, and ensuring the practicability of recommendations will help ensure that the WCSC supports both scientific advancement and the responsible development of California's offshore wind industry.

ACP-CA looks forward to continuing to engage with agencies, researchers, Tribes, and stakeholders as this effort moves forward.

Sincerely,

Molly Croll

Senior Policy Director

American Clean Power - California

April 1st, 2026

Jenn Eckerle, Executive Director
California Ocean Protection Council
715 P St., 20th Floor,
Sacramento, CA 95814

RE: Feedback on West Coast Science Collaborative for Offshore Wind Draft Blueprint

Dear Director Eckerle,

Brightline Defense is an environmental justice (EJ) organization with a mission of promoting sustainable environments and empowered communities throughout California. Low-income communities and communities of color have long borne the brunt of fossil fuel pollution and environmental degradation. Often referred to as EJ communities, these populations face disproportionate and increasing climate, health, and economic burdens. The transition to a clean energy future must not exacerbate these burdens, but rather propel resilience and transformation. As California embarks on offshore wind development, it must avoid harms and maximize benefits for EJ communities.

Brightline Defense works in close partnership with local communities and stakeholders across the state and has provided feedback to inform key state-led planning for offshore wind development, which the State has identified as an important resource to meet growing energy demand and achieve a 100% clean energy grid by 2045.¹ Our team regularly visits the local communities in Humboldt, the Central Coast and Long Beach, that are expected to host ports and other infrastructure to support offshore wind and are committed to uplifting their concerns and priorities throughout our advocacy for offshore wind. As the offshore wind industry is built from the ground up in California, it is crucial that the State proactively shapes planning and development to ensure responsible and equitable outcomes for the environment and communities. We are encouraged by the draft blueprint for the West Coast Science Collaborative for Offshore Wind (WCSC) and appreciate the opportunity to inform the program. Our recommendations focus on how the WCSC can support successful deployment of offshore wind in California's waters that benefits communities and protects the environment.

I. Expand the key commitment to transparency and ensure public reports are useful to stakeholders and impacted communities

The draft blueprint rightly focuses on the importance of transparency for the WCSC and we recommend directly including transparency among the specified goals. For instance the fourth goal could begin with: "Ensure transparency by . . ." Transparency is critical for a clear flow of information and developing trust, especially for a neutral-science focused entity.

¹ Cal. Leg. Info., Senate Bill No. 100:100 Percent Clean Energy Act of 2018, (Ch. 312, 2018).

We commend the clear goal of regular public-facing reports that summarize results and findings; however, we propose that the first report should be published before construction begins, instead of following construction. This will provide the clearest snapshot of baseline conditions to provide the best comparison of any future impacts stemming from development. We hope these public documents will be useful for communities, governments and researchers alike and encourage efforts to make the documents easily accessible and understandable for a variety of audiences with key findings and summaries highlighted.

In addition, to ensure the reports are useful to communities, we request that the West Coast Science Collaborative commits to working with the California Energy Commission to include any baseline and ongoing air quality and public health data in the published reports, specifically for the communities near the staging and integration ports. Having all the data in one place will make the reports more useful, improve agency coordination, and provide a clear snapshot of the impacts.

II. Importance of including Tribal Ecological Knowledge and Membership on the Steering Committee and add opportunities for Oregon and Washington Tribes to actively participate

We are encouraged by the WCSC's inclusion of Tribal Ecological knowledge and designation of California Native American Tribes as voting members. Tribal communities in California must have active leadership and opportunities to share expertise and direct initiatives like the development of offshore wind, especially when there will be likely impacts to tribal cultural resources. We want to reaffirm the importance of this as a priority for the formulation of the WCSC.

In this light, we recommend that Washington and Oregon Native American Tribes be actively engaged in the steering committee, at least as ex officio members until there are further offshore wind developments in those states. This would afford them an equal voice as the Oregon and Washington State Agencies, which are already included. The WCSC should be set up to prioritize government to government consultation with Tribes in California, and in collaboration with those in Washington and Oregon including ensuring that Tribes are fully aware of the opportunities to engage and shape the WCSC and its activities.

In addition, we support the development of clear pathways for Washington and Oregon stakeholders to fully integrate into the WCSC at agreed-upon milestones.

III. Ensure the WCSC supports offshore wind development that has a net benefit on ecosystems and climate

We recommend that the WCSC update the goals to go beyond mitigation of harms from offshore wind to adopt a framework of 'net gain.' Brightline Defense was part of a delegation that visited Scotland last year and we met with government officials and researchers from the Ecological Consequences of Offshore Wind (ECOWind) research program, which undertakes

state-coordinated research and efforts to address ecosystem impacts to offshore wind. One of the three core objectives of the ECOWind Program adopts the framework of 'net gain,' which is defined as "an approach to development that aims to leave the natural environment in a measurably better state than beforehand."² This approach is particularly important given the increasing impacts of climate change on people and the environment. To support more strategic coordination with ongoing climate efforts in California, the WCSC can explore adding representatives from the California Air Resources Board (CARB) and the California Environment Protection Agency (CalEPA) as agencies on the steering committee.

IV. Commit to collaboration with existing research entities and other key stakeholders

To be successful, the WCSC must collaborate with partners and existing efforts such as research led by similar entities on the East Coast and the West Coast, as indicated in the Blueprint. Through this thoughtful collaboration, the WCSC should identify research gaps and strategize on how to fill those gaps. In addition, we support calls for the WCSC to include eNGO partners as part of the steering committee with formal decision-making power.

Conclusion

We commend California for proactively addressing the need for baseline data and ecosystem monitoring with the development of a new industry off our coasts. The WCSC will be crucial to the development of offshore wind that is responsible and protects our environment and communities.

Sincerely,

Eddie Ahn
Executive Director, Brightline Defense

²ECOWind Programme - ECOWind. (Accessed March 2026). ECOWind. <https://ecowind.uk/about/>



April 1, 2026

Abby Mohan
Senior Offshore Wind Program Manager
Ocean Protection Council
715 P St., 20th Floor
Sacramento, CA 95814

RE: Comments on Draft Blueprint for Building a West Coast Science Collaborative

Our leadership team for the Pacific Offshore Wind Consortium (POWC) appreciates the time and effort that the California Ocean Protection Council (OPC) and its partners have put into crafting a vision for a West Coast Science Collaborative (WCSC). The draft blueprint articulates clear and yet achievable high-level goals that are designed to address specific science-to-policy needs to advance offshore wind (OSW) in California (and along the West Coast more broadly), and it seeks to develop an inclusive, collaborative framework to ensure that the best available science is used to inform policy. We strongly support the explicit inclusion of Tribal Nations as decision making members, and the recognition of the importance of Tribal monitoring and science. And, we appreciate the opportunity to provide feedback on this draft.

We applaud the clear statement of objectives described in the middle of page 3, so much so that we believe this statement should be highlighted more prominently in the document. It articulates the objectives very well, and it could even serve as the set of guiding principles for the entire process:

“A coordinated and transparent body, informed by subject-matter experts, will help gather, generate, review, and share the best available science-based data



and information to guide environmentally responsible offshore wind planning and development along the California Coast. Critically, the WCSC will provide a forum for cross-sector collaboration and a venue for transparent information sharing with the public, building trust and accountability as this new industry develops.”

However, as stated, the process for developing this document does not seem to meet the standard articulated above:

“It was led by the California Ocean Protection Council (OPC) with extensive collaboration with federal and California state agencies, and California Native American tribes during the summer and fall of 2025.”

There are a few notable absences from the description of how this framework was developed. (i) More details about what agencies were involved would be helpful. (ii) There is no mention of consulting or coordinating with the Regional Wildlife Science Collaborative (RWSC), the putative model on which the WCSC is based (as per text in the Appendix). That group has existed for years, and lessons learned from that effort should inform the WCSC. (iii) There is no mention of engaging with subject-matter experts – in particular, the many scientists from academia and the private sector who have extensive experience with offshore wind, monitoring programs, data standards, and many of the other issues the WCSC will include. Deep and ongoing collaboration with marine and coastal scientists – beyond the public comments solicited from this review – will be essential for the WCSC to achieve its appropriately lofty aims.

The WCSC goals are admirable:

1. Provide scientific expertise, including tribal science and Traditional Knowledges, to understand potential environmental, tribal cultural resources, and fisheries impacts from offshore wind development; identify effective mitigation measures to offset unavoidable impacts and develop adaptive management strategies.



2. Identify opportunities to prioritize coordinated monitoring to increase cost efficiencies, leverage resources and support assessment of project level and cumulative impacts. Promote regional coordination of monitoring and research agendas, including use of existing and emerging technology.
3. Establish standards for data collection and management to ensure data quality and interoperability and maximize efficiencies in data collection and analysis across monitoring efforts.
4. Synthesize monitoring data and analysis and research findings to develop a public-facing report following construction (at appropriate milestones: e.g., annually, every five years) that summarizes results from baseline and ongoing monitoring and research efforts at project and regional scale and includes an assessment of cumulative impacts.

We believe that #4 is a critical first step, not a last one; a wealth of ocean monitoring data already exist from a wide range of ongoing monitoring programs in California and the US West Coast. Extracting additional knowledge from data that has already been collected should be one of the top priorities. Those existing data will provide essential information about the spatial and temporal variability of the ecosystem features that need to be measured and monitored. Results from those analyses should guide the design of additional monitoring, ensuring that data are collected at the appropriate spatial and temporal frequency to evaluate the effects of OSW development. In addition, these analyses will also identify gaps and ways to leverage existing monitoring programs; combined, this information will allow any additional funds for monitoring to be used as efficiently as possible. Furthermore, the syntheses described in #4 need to be developed long before construction is completed, and updated (as mentioned) relatively frequently.



Steering Committee

As noted above, the absence of marine and coastal scientists as members of the Steering Committee and Coordination Committees is glaring. It is difficult to make science-driven decisions without scientists – especially field researchers – at the table. We were surprised that eNGOs are ex-officio members of the Steering Committee, whereas members of the science community are not.

We recognize that there may be reasons for excluding scientists from the Steering Committee, e.g. related to funding opportunity design – however, we would be interested to understand those reasons, and for the OPC to seek ways to silo the steering committee activities as needed, to enable fuller participation by the science community.

Initial Activities

The blueprint's description of initial activities is useful, and we agree that priorities should include understanding monitoring activities, incorporating fisheries, meaningfully involving Tribal groups, and planning for long-term sustainability.

We do feel that the section on “Development of Monitoring Protocols and Best Practice Documents” could more explicitly acknowledge the vast amount of monitoring that is already ongoing in California, the West Coast, and the broader California Current Large Marine Ecosystem (CCLME), along with the monitoring protocols and best practices that have been developed over decades. We believe the WCSC should incorporate information from these programs (and see comments on #4, above).

Learning from East Coast experiences

On Page 9, the draft document notes:

“This combination of distinctive oceanographic conditions and pioneering technology means that monitoring approaches developed for fixed bottom



offshore wind in the Atlantic or for smaller-scale floating installations elsewhere may not be directly transferable to the California context.”

While this is broadly true, we believe that many of the technologies and approaches used on the East Coast may be applicable – and that many of the lessons learned from the processes to stand up the East Coast RWSC will certainly be. We strongly recommend that this body collaborate as closely as possible with those other entities (e.g., as mentioned in the Appendix). In addition and as noted above, the extensive monitoring programs that already exist in California and the West Coast provide an ample framework for this work.

Funding

It is also notable that simply standing up and supporting the WCSC will require significant funding, not to mention the many millions of dollars that likely will be required to conduct or augment the necessary monitoring. The document mentions that the WCSC will need to develop a long-term plan that includes sustainable funding. It would be helpful to include a proposed budget with the final blueprint, which addresses near term budgetary priorities and outlines a map towards longer term funding structures.

If you have any questions, please feel free to contact Ben Ruttenberg at bruttenb@calpoly.edu or Maia Cheli at schatzenergy@humboldt.edu. Again, thank you for your time and consideration.

Sincerely,

Ben Ruttenberg, Director, Center for Coastal Marine Sciences, Cal Poly San Luis Obispo

Arne Jacobson, Director, Schatz Energy Research Center, Cal Poly Humboldt



Maia Cheli, Senior Development Manager, Schatz Energy Research Center, Cal Poly Humboldt

Kayla Corder, Project Manager, Schatz Energy Research Center, Cal Poly Humboldt

Sarah K. Henkel, Associate Director, Pacific Marine Energy Center, Oregon State University

WCSC Draft Blueprint

From Jim Haussener

Date Wed 4/1/2026 11:57 PM

To CNRA COPC Public <COPCPublic@resources.ca.gov>

RE: Comments on the Draft Blueprint for a West Coast Science Collaborative for Offshore Wind

To: California Ocean Protection Council (OPC)

From: Jim Haussener

Date: April 1, 2026

1. Addressing Knowledge Gaps and Program Timelines

The Draft Blueprint mentions "existing knowledge gaps." I request clarification on whether the State has a comprehensive inventory of these gaps. There is significant concern regarding the recurring narrative that certain impacts are already "solved." Given the extremely compressed timeframe for the first phase of this program, it is critical that the State acknowledges the limits of current data rather than assuming mitigation strategies are already finalized and effective.

2. Coordination with Federal Leasing and Future Administration Policy

Will the research and collaborative efforts envisioned in this Blueprint influence the approval processes of future federal administrations for existing Bureau of Ocean Energy Management (BOEM) leases? Furthermore, how will this work impact future lease awards? It is my understanding that BOEM was prepared to identify a subsequent round of leases in areas distinct from the initial round; the Blueprint should clarify how its scientific findings will integrate with these federal shifts.

3. Inclusion of Maritime Navigation and Radar Impacts

I request that **Navigation** be explicitly listed as a primary industry potentially impacted by offshore wind development. Research from the **National Academy of Sciences** has established that large-scale wind turbine generators can negatively impact maritime radar systems. The Blueprint must account for these interference issues and other adverse impacts on vessel safety and search-and-rescue operations.

Developing adaptive management strategies at this stage is premature. We do not yet understand the full spectrum of positive and negative impacts of floating offshore wind at the scale proposed. Furthermore:

- **Enforceability:** How can a lease legally require adaptive management for unknown future variables?
- **Feasibility:** If a project is built using Alternating Current (AC) and a future adaptive management finding suggests Direct Current (DC) is preferable, who bears the cost and authority to require such a transition?
- **Funding:** Based on the precedent of California's Marine Protected Areas (MPAs), it is often easier to mandate "management" than it is to fund the multi-year studies and public decision-making processes required to implement it—especially when no lessees are yet active to provide funding.

5. Transparency of Cumulative Impact Assessments

The document should clearly define the intended outcome of assessing "cumulative impacts." Beyond simply making this data public-facing, how will this information be used to trigger regulatory changes or project modifications?

6. Governance and Legislative Compliance

- **Ralph M. Brown Act:** While the document states that Subcommittee meetings will be open to the public, it must explicitly state that all meetings of all committees, including the Steering Committee will be subject to the **Ralph M. Brown Act** to ensure statutory transparency and public access.
- **Steering Committee Representation:** Under the current proposal, California Native American tribes can provide a representative with a combined 25% of the vote. Given this significant dedicated representation, it is inappropriate and redundant for tribal members to also occupy the two ex-officio seats reserved for the fishing community. These roles should remain distinct to ensure a balance of diverse stakeholder perspectives.

7. Risks of Standardization

I disagree with the proposed "standardization" of environmental monitoring and research. Standardization often leads to a "lowest common denominator" approach. This may result in a failure to capture the unique ecological and technical issues specific to individual lease sites, both current and future. Monitoring must be site-specific to be scientifically robust.

Thank you for providing me with the opportunity to comment

Jim Haussener

April 1, 2026

Jenn Eckerle, Executive Director
Ocean Protection Council
715 P St., 20th Floor
Sacramento, CA 95814

Submitted by email to copcpublic@resources.ca.gov

Re: West Coast Science Collaborative Draft Blueprint

Dear Director Eckerle,

The Redwood Region Climate and Community Resilience Hub (CORE Hub) thanks you for the opportunity to provide comments on the *Draft Blueprint for Building a West Coast Science Collaborative for Offshore Wind* (Draft Blueprint). CORE Hub, an affiliate of the Humboldt Area Foundation and Wild Rivers Community Foundation, supports a renewable energy transition on the North Coast to address climate change while ensuring protections and benefits to historically underinvested and frontline communities, and those who have faced the brunt of past extractive industries. Any renewable energy development, including offshore wind, must support thriving natural environments and communities today and for future generations. To that end, CORE Hub convenes and provides diverse technical assistance to community and Tribal-focused groups, including the North Coast Offshore Wind Community Benefits Network and the Tribal Climate Resilience Network.

The CORE Hub supports the establishment of the West Coast Science Collaborative (referred to in this letter as the “WCSC”) as a critical mechanism for ensuring that the best available science informs potential offshore wind development along the West Coast. While many anticipated impacts have been studied, important uncertainties remain regarding the direct, indirect, and cumulative effects of floating offshore wind in the marine environment. Creating and maintaining an adaptive management strategy grounded in rigorous, credible science will be essential for identifying and responding to known, emerging, or unforeseen issues. Achieving this will require sustained collaboration and aligned direction among Federal, State, and Local agencies; Tribal Nations; developers; academic institutions; fishermen; and nonprofits, as outlined in the Draft Blueprint. With a strong, durable structure, the WCSC will be well-positioned to facilitate this coordination, address priority knowledge gaps, and provide the science-based foundation needed to guide responsible and resilient decision-making on the West Coast.

The WCSC is vital to ensuring transparency and public understanding of the state of science on floating offshore wind energy. A poll conducted by the Barr Foundation on the East Coast found that one of the

primary concerns about offshore wind centers on "Environmental impact on habitats, ecosystems, marine life, whales, birds".¹ North Coast Communities and those across California have similar concerns.² The WCSC should become a trusted public-facing science messenger in conveying research to the general public and all impacted and affected parties to support a greater collective understanding of both the potential positive and negative impacts of offshore wind infrastructure on marine ecosystems within the current climate crisis.

We are supportive of advancing the WCSC through the proposed Blueprint and offer the following comments to clarify purpose, structure, and function of the document. We have also included a few suggestions to improve the WCSC's overall goals.

Thank you for your work, collaboration, and commitment to healthy marine ecosystems for many generations to come. We appreciate the opportunity to comment.

Key Recommendations:

- 1. The WCSC should broaden its mandate under Goal 4 to include more frequent updates on data, analysis, research findings, and adaptive management strategies to provide greater transparency to the public.**

A key objective of the WCSC should be to leverage scientific expertise to serve as a trusted messenger to the broader public and affected parties on environmental questions related to offshore wind development. To do so, the WCSC should deliver annual reports on its priorities and agenda, how to engage with the Collaborative, and public-facing scientific analysis.

In its current form, the Draft Blueprint outlines a limited mandate to share information at times determined by the Steering Committee. For example, the Draft Blueprint calls for the development of a public-facing report that synthesizes monitoring data, analysis, and research findings at "appropriate milestones: e.g., annually, every five years". The Draft Blueprint should outline more specific details about how a reporting agenda and schedule will be developed, including process leads, timeline, and key elements of the report schedule, such as outlines for processes to support vetting and decision making, priority setting, engagement of committees and other constituents, and communications plans. Providing this level of clarity and commitment to ongoing reporting to interested parties is important throughout all stages, including this early pre-development phase. These reports should also specifically identify the climate context, the need to address climate change to stave off the worst impacts of the climate crisis on ocean environments, and how that interacts with our understanding of current baseline conditions.

¹ Barr Foundation. 2024. *Views on Offshore Wind in New England*. Barr Foundation Knowledge Center Collection. <https://barrfdn.issuelab.org/resource/views-on-offshore-wind-in-new-england.html>

² As discussed in presentations by the Schatz Energy Research Center and Oregon State University on their 'Coastal Community Perspectives on Offshore Wind' project, 14 January 2026 in Eureka, California, and 15 November 2025 in Coos Bay, Oregon. Report forthcoming.

To increase transparency and public understanding of the WCSC’s proceedings, the Draft Blueprint should also ensure that the Steering Committee is transparent in its activities. The draft currently outlines the Subcommittee as “open to the public to maximize transparency and provide a venue for all interested parties to provide input,” with the exception of the Tribal Cultural Resources Subcommittee. As the main decision-making body of the WCSC, the Steering Committee should also be open to the public, include opportunities for public comment, and have well-defined criteria for closed sessions. To ensure information sharing and public opportunity for input on topic-specific questions, the Steering Committee can require subcommittee report-outs for review.

2. The WCSC should establish a Climate and Ocean Conditions Subcommittee to incorporate the climate crisis as a core area of study.

As noted in the introduction, offshore wind development is intended to support California’s clean energy goals, including carbon neutrality by 2045. Evaluating offshore wind impacts in isolation, without situating them within climate-driven changes to ocean conditions and coastal communities, risks missing the larger context that motivates these projects and shapes baseline conditions.

We recommend that the WCSC establish a subcommittee to assess and communicate the climate context—including issues like temperature and sea level rise, ocean acidification, hypoxia, and harmful algal blooms—and key trade-offs relevant to offshore wind development. This work could include scenario-based analysis of decarbonization pathways, how climate change is likely to affect marine species and habitats under different warming trajectories, and what regional and global impacts a full offshore wind build-out could result in. The subcommittee could also propose science-based decision thresholds or impact triggers to guide monitoring responses and adaptive management across the offshore wind development. While existing environmental laws may provide significance determinations at the individual project level, the WCSC is well-positioned to provide a broader environmental perspective that supports transparent public understanding and a more coherent adaptive management strategy.

3. The Draft Blueprint should clearly outline ways to engage, partner with, and inform local communities on offshore wind marine science.

While we applaud efforts to center a broad coalition of parties in the WCSC, we strongly encourage the Draft Blueprint to incorporate more specific mechanisms to engage and partner with communities affected by future offshore wind development. This could be through coordinating and encouraging community science-based approaches, such as data collection/monitoring, establishing mechanisms to inform research and report priorities, and planning for decommissioning. Additionally, the WCSC should partner with other active organizations/coalitions such as the Pacific Offshore Wind Consortium (POWC) and the West Coast Ocean Alliance (WCOA) to identify and coordinate specific workforce development opportunities related to research, monitoring, and data collection in affected communities. This will be particularly important for frontline communities on the North Coast, who will face disproportionate impacts related to offshore wind development and climate change.

4. The Draft Blueprint correctly emphasizes the need to prioritize coordinated monitoring and should expand its mandate to include stronger data governance and monitoring strategies, as well as opportunities for collaboration.

The Draft Blueprint correctly identifies the need for standardized monitoring programs and interoperable data systems to support a credible understanding of offshore wind impacts. One recurring challenge with survey and monitoring data, however, is that leaseholders or their contractors often own much of the relevant information and may be constrained by proprietary or confidentiality restrictions. The Blueprint should call for a data-governance mechanism—developed in close coordination with leaseholders—that protects sensitive information while enabling access for trusted researchers with conflict-of-interest safeguards (as determined by the Steering Committee) to analyze proprietary datasets. For example, the WCSC could establish a dedicated independent subcommittee with secure data-sharing agreements and clear rules for public-facing outputs (e.g., anonymized, aggregated, or redacted reporting) to maintain confidentiality while still supporting transparency and thorough analysis.

The following recommendations pertain to areas that we believe could benefit from additional clarification:

- 1) We appreciate that the draft Blueprint includes Tribal Nations in the decision-making process, and acknowledges the essential role of Indigenous knowledges and leadership in understanding marine ecosystems and assessing potential impacts of floating offshore wind. We encourage the WCSC to consider taking a step further by working collaboratively with Tribal partners to determine whether the WCSC should establish a formal Tribal co-management framework. Such a framework could guide priority setting, decision-making processes, communication protocols, and other core operational practices. Embedding these elements into the structure of the WCSC would demonstrate a clear, intentional, and codified commitment to Tribal co-management shared by all committee members and reflected in the entity’s governance.
- 2) In the introduction, reference potential system-wide impacts of offshore wind development to the California Current ecosystem, which States, Tribal Nations, and communities along the coast all have an interest in, regardless of whether there are wind energy areas directly off their shores.
- 3) The Purpose statement frames the WCSC’s scope as minimizing potential impacts to wildlife and marine ecosystems, yet there are still questions from a number of our partners about whether tidelands, submerged lands, turbine towing, assembly, and other domains and activities are within the WCSC’s scope. The Blueprint should clearly describe which offshore wind activities and infrastructure will be within the WCSC’s domain.
 - a) Example: (introduction page 3)
 - i) Existing: “Currently, there is no mechanism to coordinate or standardize environmental monitoring and research needed to identify potential impacts from offshore wind development across individual projects or at a regional scale.”

- ii) Suggested: Currently, there is no mechanism to coordinate or standardize *ocean-based* environmental monitoring and research needed to identify potential impacts from offshore wind development across individual projects or at a regional scale *in the marine environment*.
- 4) Goal 2 of the WCSC should be edited to “identify opportunities *and constraints* to prioritizing coordinated monitoring...”. The WCSC may, in its course, identify barriers to good monitoring practices, and should provide a platform for identifying those. This will enable policymakers, advocates, and interested parties to pinpoint potential solutions to bottlenecks.
 - 5) The appendix notes both the Pacific Offshore Wind Consortium (POWC) and the West Coast Ocean Alliance (WCOA) as existing efforts to "coordinate regional priorities and research". Given the highly related nature of these different collaboratives, the WCSC Draft Blueprint should clearly identify how the WCSC will operate in partnership with them. This would provide much-needed clarification on the roles, responsibilities, and goals of the different parties, and offer local communities guidance on how to inform and understand the relationship between marine ecosystems and offshore wind.
 - 6) Currently, the draft contains some ambiguous goals that require clarification. On the one hand, it states that, "Although government agencies will participate in the WCSC, the work and products of the WCSC will not be included in government regulations. The WCSC will not be established or utilized by a *federal agency for the purpose of obtaining advice or recommendations* on issues or policies for any agency." In another place, the draft states: "Creation of a West Coast Science Collaborative for Offshore Wind (WCSC) will address this gap and provide needed independent and objective scientific expertise that *can inform coordinated* environmental research, monitoring and analysis, *as well as support regulatory decision making* and adaptive management at both individual project and cumulative scales." While we understand that the WCSC is not a regulatory agency or body, we hope the finalized language can be more specific about the body's intent here by incorporating less conflicting language and clarifying what ‘obtaining advice’ and ‘recommendations’ means.
 - 7) While the current draft establishes that the co-chairs of Subcommittees (which provide topic-area scientific and technical expertise) will be selected through a public nomination process and approved by the Steering Committee, it is unclear how other Subcommittee members (i.e., members who are not co-chairs) are chosen. The Blueprint should specify potential mechanisms for that selection process. To remedy this, we recommend adjusting the language “The Steering Committee can create, rearrange, combine, and/or reconstitute subcommittees” to address general membership specifically.
 - 8) Consider inviting the following agencies to the Steering Committee, given their policy and regulatory functions:
 - a) Federal: Environmental Protection Agency
 - b) California: Air Resources Board

- c) Ex-officio Members
 - i) Oregon: Department of Energy
 - ii) Washington: State Energy Office
-

Finally, as the Draft Blueprint acknowledges, **there is a clear need for long-term funding mechanisms to support participating partners' capacity**. Meaningful participation will require sustained staff time and technical support—particularly for Tribal Nations—across all committees to ensure monitoring and review, data analysis, cultural resources protection, and ongoing coordination. Long-term funding is vital to ensure that participation does not become uneven and overly reliant on uncompensated labor, thereby limiting the effectiveness of WCSC. To maximize the WCSC's utility, we strongly encourage the State to establish durable funding and dedicated capacity to support partners' full engagement.

Conclusion

The CORE Hub appreciates the Ocean Protection Council's leadership in advancing a thoughtful, collaborative, and science-driven approach to offshore wind development on the West Coast. As California works to meet its clean energy and climate resilience goals, it is essential that the development of floating offshore wind protects marine ecosystems, upholds Tribal sovereignty, and delivers meaningful, measurable benefits for frontline and historically underinvested communities. We offer these recommendations in the spirit of partnership and with a shared commitment to ensuring that offshore wind is developed responsibly, transparently, and in a manner that strengthens the long-term health and resilience of both our ocean and our coastal communities. We look forward to continued collaboration as the Blueprint moves forward. I welcome you to contact me at katerinao@hafoundation.org or (707) 267-9902.

Sincerely,



Katerina Oskarsson, PhD
CORE Hub Executive in Residence

FW: Please submit with public comment by the MBCFO on the draft Blue Print for west coast scientific collaboration

From Kalua, Kaitlyn@CNRA <Kaitlyn.Kalua@resources.ca.gov>

Date Wed 3/4/2026 11:51 AM

To Mohan, Abby@CNRA <Abby.Mohan@resources.ca.gov>; Kimball, Justine@CNRA <Justine.Kimball@resources.ca.gov>

Cc Hayden, Stacy@CNRA <Stacy.Hayden@resources.ca.gov>

Abby, forwarding comment received:

--

Kaitlyn Kalua, Deputy Director
California Ocean Protection Council



CALIFORNIA
OCEAN
PROTECTION
COUNCIL

From: CNRA COPC Public <COPCPublic@resources.ca.gov>

Sent: Wednesday, March 4, 2026 11:50 AM

To: COPC Public Distro List <copcpubliclist@resources.ca.gov>

Subject: FW: Please submit with public comment by the MBCFO on the draft Blue Print for west coast scientific collaboration

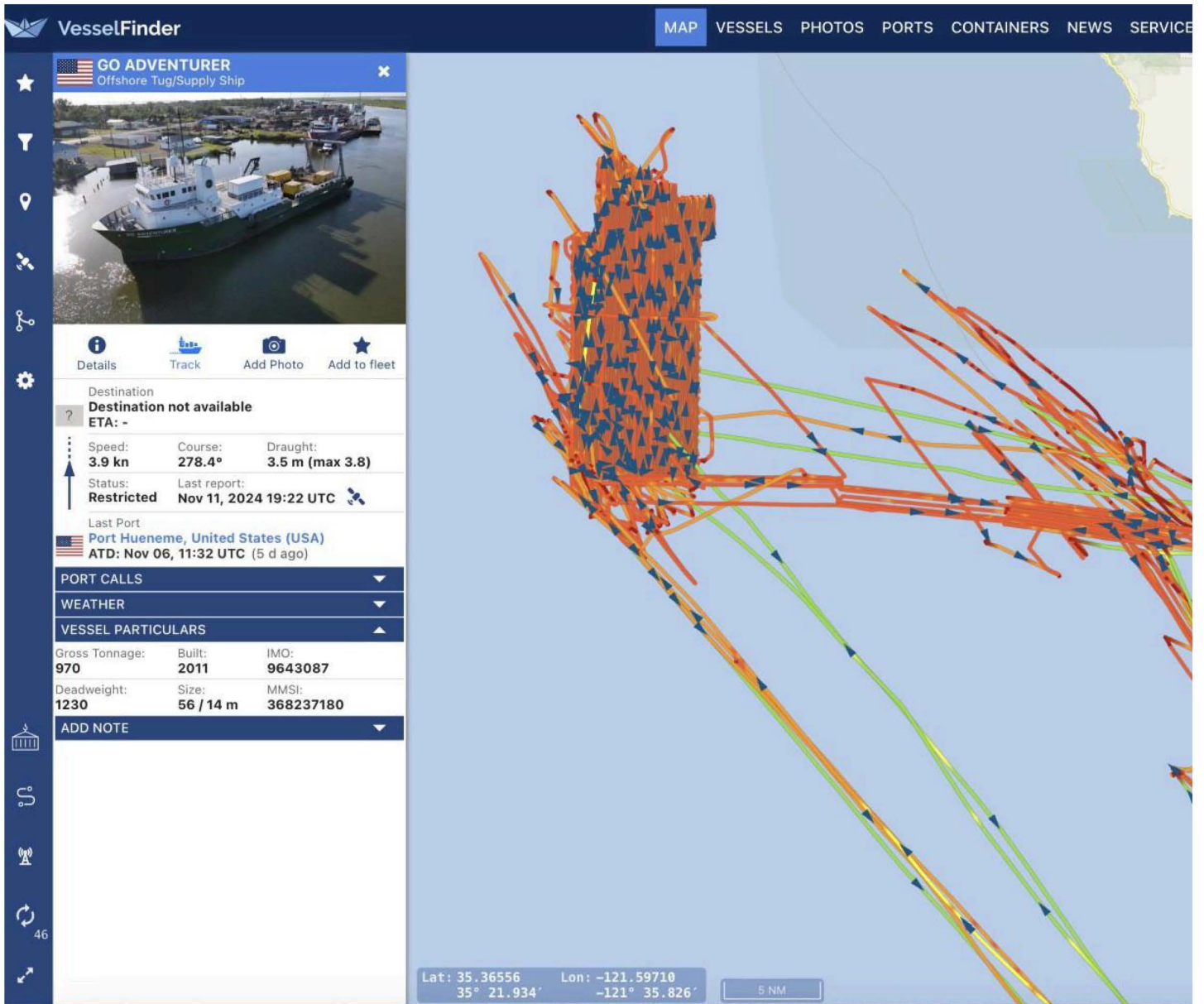
From: mbcfo member

Sent: Wednesday, March 4, 2026 11:48:39 AM (UTC-08:00) Pacific Time (US & Canada)

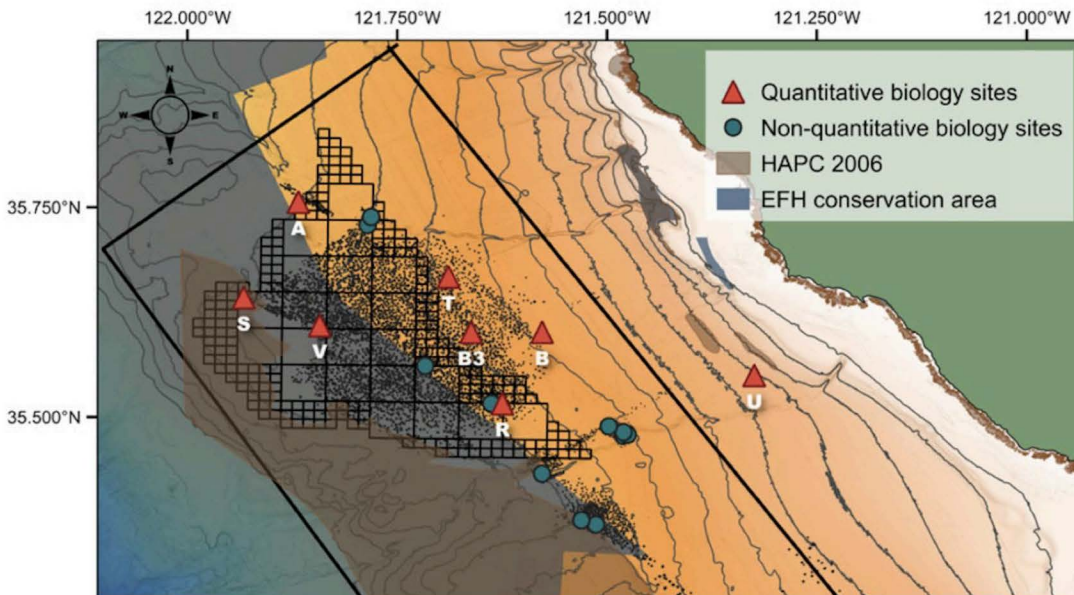
To: CNRA COPC Public <COPCPublic@resources.ca.gov>

Subject: Please submit with public comment by the MBCFO on the draft Blue Print for west coast scientific collaboration

30 days of Satellite tracking of the HRG survey vessel for Golden Wind IIc. Note the straight lines, never stopping and significant cable route survey work closer to shore.



This is a map from the USGS EXPRESS mapping showing the Wind Energy Area in black squares inside EFH and HAPC.

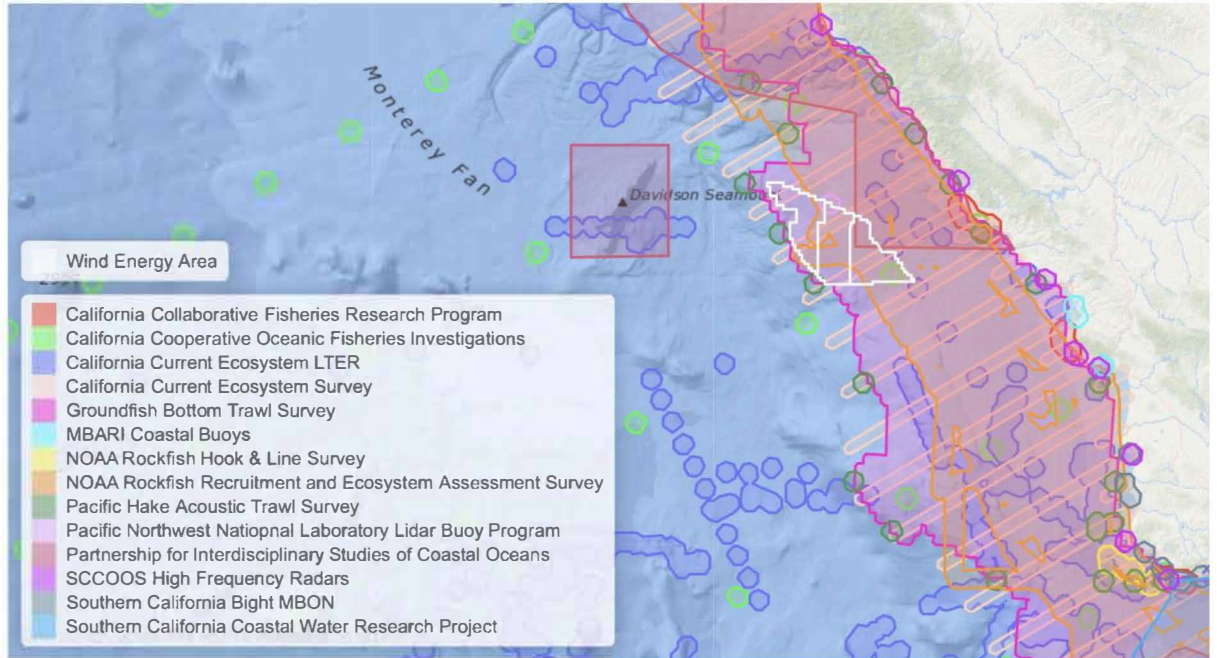


This is the specs on the AUVs and UTPs utilized by Atlas Wind llc.

Table 1 Geophysical Equipment and Acoustic Information

AUV HRG Payload	Make/ Model	Acoustic Information	Comments
AUV HRG Equipment HUGIN 6000			
Multi-Beam Echo Sounder (MBES)	Kongsberg EM2040-04	Frequency: 200-400 kHz 217 dB re 1 µPa (RMS)	The frequency of this equipment is above the range of marine mammals, sea turtles, and fish
Side Scan Sonar (SSS)	Edgetech 2205	Frequency: 230/540 kHz 230 kHz: 200 dB (SEL), 220 dB (RMS), 223 dB peak 540 kHz: 196 dB (SEL), 219 dB (RMS), 222 dB peak	The frequency of this equipment is above the range of marine mammals, sea turtles, and fish
Sub-bottom Profiler (SBP)	Edgetech DW216	Frequency: 2-16 kHz 171 dB (SEL), 188 dB (RMS), 191 dB peak	NOAA Fisheries considers use of this equipment de minimis effects. No adverse effects to wildl anticipated.
Magnetometer	OFG Self Compensating Magnetometer	Nonauditory	Nonauditory.
HRG Equipment on Nearshore HRG Vessel and Nearshore HRG AUV			
MBES (hull/pole-mounted)	R2Sonic 2024	Frequency: 700/450/200 kHz 191 dB to 221 dB re 1 µPa RMS	The frequency of this equipment is above the range of marine mammals, sea turtles, and fish
Nearshore survey vessel and Nearshore AUV			
SSS (Towed from vessel, hull mounted in nearshore AUV)	EdgeTech 4205 Tri-Frequency or Multi-pulse	Frequency: 230/540/850 kHz Source Level: 230khz: 200 dB (SEL), 220 dB (RMS), 223 dB peak 540khz:	The frequency of this equipment is above the range of marine mammals, sea turtles, and fish
Acoustic Characteristics	Frequency: 21-31 kHz Operational Power: Battery-powered 10-14.4 volts DC Source level: 206 dB Beamwidth: 30° horizontal and vertical Ping rate: 1 to 10 Hz		

This is the recently submitted digital map showing all the research programs in the Morro Bay Wind energy area.



Project Contacts

Rikki Eriksen, Ph.D.
rikki@californiamsf.org

Julia Dombroski, Ph.D.
julia@californiamsf.org

Tom Hafer
Secretary MBCFO

**BlueGreen Alliance Oregon, National Wildlife Federation, Oregon Environmental Council,
Oregon League of Conservation Voters, Rogue Climate, Sierra Club Oregon,
Southern Oregon Climate Action Now**

April 1, 2026

Jenn Eckerle, Executive Director
California Ocean Protection Council
715 P St., 20th Floor
Sacramento, CA 95814

RE: Draft Blueprint for Building a West Coast Science Collaborative

Dear Director Eckerle,

On behalf of the undersigned organizations, we appreciate the opportunity to submit comments to the California Ocean Protection Council (OPC) on the Draft Blueprint for Building a West Coast Science Collaborative (WCSC) for Offshore Wind. We strongly support the creation of the WCSC as an independent, regional body to advance coordinated ecosystem research and monitoring off the West Coast focused on the impacts of offshore wind development across projects and at a regional scale.

The passage of AB 525 was a monumental achievement in California, ensuring that offshore wind development would be thoughtfully planned and its impacts duly considered. OPC's leadership has been, and will continue to be instrumental in aligning offshore wind development with conservation priorities, protecting marine ecosystems, and ensuring decisions are guided by science and ongoing monitoring. We anticipate that the WCSC will be an organizing force, providing neutral, science based coordination and guidance to support informed decision-making as the state implements and continuously evaluates offshore wind energy.

Although Oregon has not determined whether or not the state will pursue offshore wind, the passing of HB 4080 similarly demonstrates Oregon's commitment to thoughtful science and policy planning for offshore wind energy. The product of this law, the creation of the state's first-ever Offshore Wind Energy Roadmap, which is currently open for public comment, will help decision-makers determine Oregon's energy future. Regardless of whether or not Oregon, like California, chooses offshore wind energy, or it chooses another path, we strongly advocate for Oregon's active and enduring involvement in the WCSC.

By inviting Oregon and Washington as ex-officio members of the Steering Committee, the Draft Blueprint wisely recognizes both the interconnectedness of West Coast ecosystems and the need for

regional coordination to understand and communicate the impacts of energy development. Coordinating these efforts regionally, through partnerships like the WCSC, will help align state priorities, maximize opportunities for collaboration, and ensure the transition to clean energy proceeds efficiently and responsibly while safeguarding the California Current Ecosystem (CCE).

Our organizations advocate for a responsible approach to offshore wind energy development that: (1) avoids, minimizes, mitigates, and monitors for adverse impacts on wildlife and habitats; (2) minimizes negative impacts on other ocean uses; (3) includes robust consultation with Native American Tribes and communities; (4) meaningfully engages state and local governments and interested and affected parties from the outset; (5) includes comprehensive efforts to avoid impacts to underserved communities; and (6) uses the best available scientific and technological data to ensure science-based and community-informed decision making. With these core principles in mind, we offer our recommendations on the Draft Blueprint for your consideration:

Recommendations for the WCSC

- Ensure Oregon's expertise is integrated from the outset not only on the Steering Committee through ex-officio representation, but also within Subcommittees and the Coordination Committee.
- Identify and prioritize research needs, monitoring standards, and knowledge gaps that consider the full CCE, including waters off Oregon and Washington.
- Share reports, findings, and decision-making processes with the public across all West Coast states to build trust, accountability, and community-informed outcomes.
- Engage Tribes, agencies, eNGOs, researchers, and local experts from Oregon, Washington, and California; consider how to ensure diverse perspectives across sectors within Oregon and Washington can be represented *before* full incorporation of these states within the WCSC. An Oregon Caucus structure may be helpful to inform Oregon and Washington's Steering Committee representatives.
- Maintain a neutral, science- and knowledge-focused body that informs regulatory frameworks while prioritizing protection of marine ecosystems across the West Coast.
- Develop a comprehensive Science Plan leveraging existing research from all West Coast states, documenting mitigation strategies, monitoring protocols, and best practices for regional application.
- Establish frameworks for equitably directing research funding to Oregon and Washington and for soliciting research support from these states through procurement, developer contributions, or other mechanisms. Define clear benchmarks and a phased expansion plan to integrate Oregon and Washington parties into the WCSC early (beginning at the Intergovernmental Task Force formation and prior to site identification and leasing) with developers joining after lease awards.
- Promote regional data-sharing and coordination to prevent duplicative efforts and support collective understanding of the CCE, while prioritizing data-standardization.

The proposed WCSC is critical for advancing comprehensive understanding of the CCE and serving as a science-based framework to guide responsible offshore wind development along the West Coast. OPC's leadership and engagement with Tribes, state agencies, eNGOs, community members, and other interested parties is commendable. Our organizations strongly support the creation of this entity, and advocate strongly for our increasing participation in the WCSC to ensure robust, science-based, and community-informed knowledge of offshore wind development.

Sincerely,

Shayna Steingard, Senior Policy Specialist, Offshore Wind Energy
National Wildlife Federation

Ranfis Giannettino Villatoro, Oregon State Policy Manager
BlueGreen Alliance

Ben Brint, Senior Climate Program Director
Oregon Environmental Council

Eliza Walton, Coalition Director
Oregon League of Conservation Voters

Ashley Audycki, South Coast Regional Coordinator
Rogue Climate

Emily Bowes, Policy Strategist
Sierra Club Oregon

Daniel Scotton, Executive Director
Southern Oregon Climate Action NOW (SOCAN)

Name: David Schrom

Organization: public service. non-profit is a misnomer and profit under GAAP is a lie.

Comment: Thank you for organizing the WCSC.

Please consider referring to what you currently term "scientists" as "professional scientists."

I perceive that we'll be more successful in building a science-based society if we recognize that all of us science (yes, a verb, to denote something we do—behave to improve prediction) more or less constantly, that each of us sciences with varying success in different domains, and that all of us will benefit by each becoming more conscious, consistent, and competent in sciencing.

So long as professional scientists arrogate the identity "scientist" to people qualified by educational credentials or job title, and deny it to everyone else, only a small fraction of the population will have identity-based motivation to science better, in which I include distinguishing valid scientific findings from dogma, and qualified experts from frauds.

I suggest an inclusive partnership strategy in place of an implicitly authoritarian "us/them." Professional scientists reject authority and embrace collaboration withing the scientific community. Why offer or ask anything less to others?

Thank you for reading and considering this comment.

Name: Daniel J. Hasselman

Organization: Non-profit

Comment: The group organizing the formation of the West Coast Science Collaborative should carefully consider whether including offshore wind leaseholders as voting members of the steering committee is a wise choice. This may present a serious conflict of interest for the collaborative. In my experience with the development of tidal power in the Bay of Fundy, the Fundy Ocean Research Center for Energy had tidal power proponents as voting members of its Board of Directors. This presented a serious conflict of interest for the organization, as tidal developers were inherently self-interested and could not put aside their own individual companies agendas for the advancement of the sector as a whole. To avoid this situation, I recommend that offshore wind leaseholders sit as (non-voting) Ex-officio Members. Developers still have an important role to play and their opinions need to be considered, but they are not scientists and should not be voting on the science needs of a sector from an (i.e., ecosystem function, ecological interactions).

Additionally, the number of representative votes on the steering committee ought to be an odd number. The current number of voting members on the Steering Committee (12) can lead to 6-6 deadlocks that can be avoided by simply reducing the number of voting members to 11.

Name: Tom Hafer

Organization: Morro Bay Commercial Fishermen's Organization

Comment: The "Blue Print" should include data collection of existing baseline studies before High Resolution Geographic (HRG) surveys occur, not only for construction and operations. There are many gaps in the science regarding impacts from using AUVs on UTPs. In fact there is zero research on this. The HRG surveys are utilizing AUVs that emit upwards of 191 db+ as low as 2kHz and the UTPs utilize 206 db at a ping rate of 1-10 Hz only 40 feet off the bottom in areas of Essential Fish Habitat and Habitat of Particular Concern for several weeks to months at a time 24/7 without stopping. There is evidence that this type of sound exposure could be lethal to larvae, krill, phytoplankton, and other benthic species such as spot prawns. This was evidenced in the dramatic drop of spot prawn landings after the USGS AUV mapping between Monterey and Point Conception 2017-2019. The "Blue Print" should show some responsibility to monitor more closely the intense, large scale, HRG surveys proposed by offshore wind that could cause severe damage to the bottom floor. The California Marine Sanctuary Foundation has done a good job collecting current research done in the wind energy areas that could be utilized as baseline studies for Before, After, Control, Impact research.

Name: Laura Morse

Organization: JASCO Applied Sciences

Comment: Hello, I am an original/founding member of the RWSC and former offshore wind developer who worked for Invenery and Orsted. I currently sit on the RWSC Marine Mammal Subcommittee, technology SC and have supported development of the PAM standards document and others docs. Prior to working for offshore wind developers I worked for Shell in Alaska and sat on the North Pacific Research Board Stakeholder Committee .

Generally the WCSC organizational structure aligns with RWSCs and is also similar to NPRB so I see no specific concerns with the structure as laid out.

The goals of the organization also closely align with those of RWSC and to a lesser degree NPRB. However goal #4 as written exceeds what the scope of the organization should be . Specifically the draft blueprint states: "4. Synthesize monitoring data and analysis and research findings to develop a public-facing report following construction (at appropriate milestones: e.g., annually, every five years) that summarizes results from baseline and ongoing monitoring and research efforts at project and regional scale and includes an assessment of cumulative impacts.". This goal implies that the WCSC themselves will do this work which I believe exceeds the purpose of an organization like this. The WCSC should not perform analytical work themselves but competitively fund such efforts to be completely by 3rd parties outside of the WCSC. Further it is the responsibility of a developer per permit conditions to summarize and develop reports resulting from required monitoring efforts unless the permits allow for delegation to a 3rd party. WCSC should be clear in goal # 4 and create a clear boundary between regulatory required mitigation/monitoring and reporting that intersects directly with wind farm works and what falls in to the bucket of pre, during and post long term monitoring that is somewhat distinct of windfarm activities. While not immediately obvious to some, these are distinct buckets of work. Mitigation and Monitoring during construction is typically managed by the developers thru specialist contractors who perform such works on board project vessels and assets . Baseline and long-term scopes are typically independent of construction and operation works and any asks to install monitoring tools on a substation or wind turbine must be addressed years in advance as these must be integrated into the windfarm design.

Finally take note that Wind farm developers are legally at risk and legally obligated to ensure they are compliant with any and all permit conditions. These can number in the thousands. They take this responsibility seriously as their project is at risk and can be shut down /delayed if there is a non-compliance and this can lead to impacts to the rate payers on shore. Therefore , developers are heavily handed in their oversight of the execution of these measures. If the WCSC has desire to take on delivery of a compliance condition and therefore responsibility to ensure compliance of a permit measure the WCSC should themselves understand what this risk brings to the organization itself and have clear guardrails in place and agreement with regulatory agencies if WCSC is unable to meet exactly what is stated as a permit requirement, developers will ask for similar assurances for their own liability. Given

what transpired for RWSC and east coast developers with the POWER -ON program, developers will be cautious in the future as the collapse of the POWER-on program put developers at legal risk.

If you have not, please take the time to review NPRB's structure, their model is a very good one and their approach to regional integrated ecosystems studies is something for the WCSC to consider establishing out of the gate (<https://nprb.org/integrated-ecosystem-research/>).

Name: Joshua Goldstein

Organization: Community member

Comment: I do hope the appropriate subcommittee on birds and bats will have ornithology experts that speak to the effects on birds and bird migration. Are the locations directly in the usual migration patterns? What can be done to the turbines to mitigate bird fatalities?

Name: Troy Hartley

Organization: Non-Profit/Renewable Energy Wildlife Institute

Comment: Comments on the Draft Blueprint for Building on West Coast Science Collaborative for Offshore Wind. Troy Hartley, Ph.D., Executive Director, Renewable Energy Wildlife Institute, twhartley@rewi.org.

1. While nation-wide and focused on land-based wind and solar, the Renewable Energy Wildlife Institute is another Complementary Collaborative Efforts that would be worth referencing and strategic partnerships, particularly on topics of data management and sharing, communication, and convening among industry, NGOs and government.

Description: The Renewable Energy Wildlife Institute (REWI, www.rewi.org) is an independent, non-profit collaborative science institute, that through science and collaboration among industry, conservation and science NGOs, and government agencies that aims to advance renewable energy deployment and protect wildlife, ecosystems and biodiversity. REWI funds and conducts research and is a third-party data manager that develops and maintains information-sharing platforms to facilitate the synthesis and identify cross-project trends and learnings. REWI has professional development, outreach, engagement and communication capacity to facilitate multi-stakeholder convening and ensure the best available science reaches decision-makers at local, state and federal levels.

2. Consider including a collaborative research mechanism into the West Coast Science Collaborative, to convene the public, private and nonprofit sectors to: jointly assess the state of the science and build a shared understanding of the problem; prioritize research needs that inform decision-making, advance deployment and minimize wildlife and ecosystem impacts; provide opportunities to pool resources to fund research; conduct research; and jointly communicate and share findings. Collaborative research is a trust-building and cross-sector professional relationship-building method, in addition to producing critical science to inform decision-making and solve renewable energy-wildlife interaction challenges. The trust and relationships built produce benefits beyond science, including more efficient dispute resolution and problem-solving in management and regulatory contexts. These relationships and professional networks will lead to faster deployment of renewable energy with fewer negative impacts on wildlife and communities, supporting decarbonization in a just manner that does not undermine biodiversity conservation.