

DOCKETED

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*Comment Received From: Varner Seaman, American Clean Power California
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Permitting roadmap comments by OWC and ACP-CA

I submitted these earlier today but not sure they went through. Resubmitting just in case.

Additional submitted attachment is included below.



February 10, 2023

California Energy Commission
715 P Street
Sacramento, California 95814

Re: Docket No. 17-MISC-01

Dear Chair Hochschild and Commissioners:

Offshore Wind California (OWC) and American Clean Power California (ACP-CA) would like to thank the California Energy Commission (CEC) for their efforts to date to meet Assembly Bill (AB) 525 (Chiu, Chapter 231, Statutes of 2021) requirements for developing an offshore wind permitting roadmap (Permitting Roadmap). In addition, OWC and ACP-CA thanks the CEC for the opportunity to provide comments on the conceptual Permitting Roadmap. Portions of the conceptual Permitting Roadmap we support include the following:

1. Key assumptions underlying the conceptual Permitting Roadmap: 1) That interagency memoranda of understanding (MOU) and coordination plans are foundational to effective, coordinated, comprehensive, and efficient permitting, and 2) that the Permitting Roadmap can be implemented without new laws, though additional state and local agency resources are critical, and resources for stakeholders and Tribal Nations can help advance meaningful participation.
2. State agency coordination: The conceptual Permitting Roadmap is another example of the extraordinary coordination that has transpired between state responsible and trustee agencies around offshore wind in California. This coordination is essential to successfully developing and implementing a Permitting Roadmap that provides state and federal coordination, efficiency, predictability, and necessary transparency.
3. State and federal permitting timelines: Efforts to align the state California Environmental Quality Act (CEQA) and the state permitting process with the National Environmental Policy Act (NEPA) and other federal permit processes (as indicated in Figure 3 of the conceptual Permitting Roadmap) and establishment of a state permitting dashboard similar to the federal FAST-41 dashboard, which has been a very useful tool for major projects under federal jurisdiction. We strongly support a state equivalent that is coordinated with the federal dashboard for offshore wind projects. We recommend that the CEC designate which state or local agency will host this dashboard in the final version of the Permitting Roadmap.

Overall, the Permitting Roadmap needs to include the details and specificity necessary for agencies, Tribal Nations, stakeholders, and leaseholders to understand how the coordinated permitting process will be implemented.

OWC and ACP-CA submitted comments to the CEC on October 6, 2022, requesting the following items be included in a successful Permitting Roadmap for offshore wind:

1. Identification of leadership entity/agency (preferably non-trustee agency).

2. Sequencing that details a) permitting steps and requirements and b) agency timing obligations to meet the schedule proposed by the Permitting Roadmap.
3. A detailed Gantt chart that depicts early engagement between leaseholders and agencies/stakeholders, review and comment timeframes for specific documents such as the construction and operations plan (COP) and internal draft CEQA documents, identification of cooperating agency meetings and other milestones, etc.
4. Execution of an MOU or coordinated permitting plan (CPP) with all state and federal agencies.
5. Identification of the need for a secure, long-term funding source for all trustee and responsible agencies involved in offshore wind projects and for implementing the Permitting Roadmap.

The OWC and ACP-CA comment letter regarding development of the Permitting Roadmap (submitted to the CEC docket on October 6, 2022) is attached for your reference (Attachment A).

Representatives from both OWC and ACP-CA provided oral testimony at the December 19, 2022, CEC workshop in support of a robust Permitting Roadmap and reiterated details that should be included in it from our October 6, 2022, comment letter. Excerpts from the December 19, 2022, workshop transcript are attached for your reference (Attachment B).

Specific AB 525 conceptual Permitting Roadmap comments are as follows:

1. Industry is requesting participation in the Permitting Roadmap drafting process based on our deep technical expertise and experience permitting offshore wind, in addition to experience with complex, multi-agency permitting of energy and infrastructure projects in California. Industry also understands the requirements and constructability of offshore wind technologies and associated facilities. This understanding is essential to developing a successful coordinated and efficient permitting process.
2. Provide a detailed schedule/Gantt chart that depicts developer/agency early engagement, coordinated agency reviews and sequencing, etc. This schedule will provide the predictability and transparency that is essential to promoting responsible, efficient, and successful offshore wind development.
3. The Permitting Roadmap indicates the intention to create efficiency through provision of a "single permit application checklist" that encompasses requirements of each permitting entity to accommodate integrated permit application document submissions and agency review with defined interim and final milestones. OWC and ACP-CA request clarification on the status of this checklist and request review of a draft, when available.
4. In addition to a permit application checklist (or as part of that checklist) and in collaboration with industry, a feasible and practical initial checklist of necessary project data and/or report requirements along with a submission schedule is needed. Early agreement with industry that is also in alignment with the COP development and review process will ensure predictable delivery of technically sufficient data and information that will be used for the CEQA and NEPA analyses.
5. Allowing agencies to join the MOU at any time throughout the permitting process would result in significant schedule delays. Therefore, OWC and ACP-CA recommend removing the phrase that allows for adding new agencies "at any time" from the conceptual Permitting Roadmap and include a specific deadline for joining that would reduce the likelihood of schedule impacts. The deadline for joining the MOU should be reflected in the detailed schedule/Gantt chart.
6. An example MOU should be an appendix to the Permitting Roadmap.
7. The conceptual Permitting Roadmap indicates that an MOU would be executed within 180 days of lease issuance. The MOU should be executed closer to lease issuance to ensure it is in place before site investigation activities begin. We recommend that an MOU be in place within 60 days of an executed lease.

8. Figure 3 of the conceptual Permitting Roadmap should depict a 2-year timeframe for CEQA that is concurrent with the NEPA 2-year timeframe.
9. The Permitting Roadmap should identify the CEQA lead agency for all offshore wind projects proposed in California. The CEQA lead agency needs to have the experience and understanding required to prepare a legally and technically sufficient CEQA document. Designating a single lead CEQA agency will also provide consistency in the analysis of impacts, avoidance, minimization and mitigation measures, as well as the underlying technical information used to support the analysis.

With respect to the Bureau of Ocean Energy Management's (BOEM's) recently published draft of the Renewable Energy Modernization Rule (Mod Rule; 88 *Federal Register* 5968, January 30, 2023) and BOEM's *DRAFT Information Needed for Issuance of a Notice of Intent (NOI) Under the National Environmental Policy Act (NEPA) for a Construction and Operations Plan (COP)* (Draft NOI Checklist) issued October 24, 2022, the offshore wind industry has expressed serious reservations regarding key aspects of the Draft NOI Checklist, which are inconsistent with some provisions of the proposed Mod Rule such as timing for submission of geotechnical survey data. The offshore wind industry has also proposed several new federal permitting milestones that, if adopted in the Mod Rule, could provide more clarity regarding coordination with California's permitting process. Given this, we recommend that the final Permitting Roadmap acknowledge that federal permitting processes are evolving and commit California to adapting its permitting processes to those changes as necessary to avoid inconsistencies between federal and state regimes.

The conceptual Permitting Roadmap states that the California Coastal Commission (CCC) intends to hold only one hearing for the coastal development permit (CDP) and consistency certification. The CDP requires a completion of the CEQA process and a certified notice of determination (NOD), whereas the NEPA record of decision (ROD) requires concurrence with the consistency certification. To conduct one CCC hearing would require the CEQA NOD be completed before the NEPA ROD can be issued. That means, any delay to the issuance of the CEQA NOD would delay the CCC process, which in turn would delay BOEM's ROD. We recommend that the final Permitting Roadmap incorporate flexibility to acknowledge that the CCC may hold an additional hearing on the consistency certification.



Alex Jackson
Director, California State Affairs
American Clean Power Association



Adam Stern,
Executive Director
Offshore Wind California

ATTACHMENT A:

Comment Letter



**Meeting California's 25 GW Offshore Wind Goal
Key Elements of an Effective and Efficient AB 525 Permitting Roadmap
September 29, 2022**

Assembly Bill (AB) 525 requires the California Energy Commission (CEC), in consultation with other state, local and federal agencies, tribes and affected stakeholders, *to develop and produce a permitting roadmap that describes timeframes and milestones for a permitting process for offshore wind energy facilities and associated electricity and transmission infrastructure off the coast of California.*¹ To be effective, the Permitting Roadmap (Roadmap) has to be more than a list of permits and approvals. The Roadmap needs to establish a coordinated permitting process that commits all relevant state agencies to using an efficient process by which project developers can navigate through the variety of environmental reviews and approvals that will be needed to successfully plan, construct, and operate an offshore wind energy project.

In particular, the Roadmap should: 1) identify a lead office or appointee and representative of the Governor who will be given responsibility for and authority to oversee the implementation of the Roadmap; 2) provide a framework for sequencing the permitting process with one or more mechanisms for interagency dispute resolution and real-time troubleshooting; 3) develop a schedule and timeframe to complete the permitting process consistent with the federal permitting timeline; and 4) establish a deadline for participating agencies to enter into a memorandum of understanding (MOU) or coordinated permitting plan (CPP) to meet Roadmap objectives.

Political Leadership

Offshore wind permitting requires strong political leadership to achieve the state's offshore wind goals in an efficient, timely manner and with positive environmental outcomes. The Roadmap should identify a responsible lead agency that has the infrastructure and resources necessary to provide oversight of the permitting process and help maintain agency coordination and commitments. Ideally, the leadership role for an offshore wind permitting process should be filled by a non-trustee agency or other agency not directly responsible for offshore wind permitting. This could be the Governor's office or the Energy and Climate Unit at the California Governor's Office of Business and Economic Development (GO-Biz), for example.

¹ Section 25991.5 of AB 525 states: (a) The commission shall develop and produce a permitting roadmap that describes timeframes and milestones for a coordinated, comprehensive, and efficient permitting process for offshore wind energy facilities and associated electricity and transmission infrastructure off the coast of California. (b) In developing the permitting roadmap, the commission shall consult and meaningfully collaborate with all relevant local, state, and federal agencies, including, but not limited to, the California Coastal Commission, the Department of Fish and Wildlife, and the State Lands Commission, interested California Native American tribes, and affected stakeholders. (c) The permitting roadmap shall include a goal for the permitting timeframe, clearly define local, state, and federal agency roles, responsibilities, and decision-making authority, and include interfaces with federal agencies, including timing, sequence, and coordination with federal permitting agencies, and coordination between reviews under the California Environmental Quality Act (Division 13 (commencing with Section 21000)) and the federal National Environmental Policy Act of 1969 (42 U.S.C. Sec. 4321 et seq.). (d) The commission shall provide an opportunity for stakeholder input in the development and communication of the permitting roadmap and an opportunity for public comment on a draft permitting roadmap. (e) The findings resulting from activities undertaken pursuant to this section shall be included in the chapter of the strategic plan relating to permitting as specified in paragraph (4) of subdivision (c) of Section 25991. (f) On or before December 31, 2022, the commission shall complete and submit the permitting roadmap to the Natural Resources Agency and the relevant fiscal and policy committees of the Legislature.

Sequencing

Absent a change to existing law, the California Environmental Quality Act (CEQA) Lead agency is likely to be the California State Lands Commission, provided a local entity does not have jurisdiction over granted tidelands. The CEQA lead agency will need the ability to rely upon a framework that sequences permitting steps and requirements to meet the permitting schedule proposed by the Roadmap and for all parties to have certainty in the process. The CEQA lead agency will be responsible for coordinating and moving the permitting process forward while relying on the responsible and trustee agencies for their subject matter expertise and input into the potential effects to resources under their respective jurisdictions. The CEQA lead agency will prepare the technically and legally defensible CEQA document, which will include a review of studies and reports by the pertinent responsible or trustee agencies, and will also provide an opportunity for those agencies to weigh in on the methodology used for analyses.²

Schedule

A logical sequencing of the necessary environmental reviews and permitting steps can be used to develop the overall schedule to implement the Roadmap. The schedule will also need to depict when during the CEQA process project proponents should engage responsible agencies and affected stakeholders and when responsible and trustee agencies are expected to provide their reviews and comments on the CEQA draft environmental impact report. A detailed Gantt chart that depicts timeframes for reviews, cooperative agency meetings, and due dates can help facilitate an efficient process and help participants meet their time commitments. The schedule and sequencing need to account for early engagement and coordination with leaseholders and state agencies to ensure that data gathering is conducted, and reports and studies are prepared in a manner consistent with state agency needs.

Agreement

The Roadmap should also have a mechanism that commits all involved agencies to the proposed schedule and sequencing. This can be in the form of an MOU or CPP. This mechanism needs to be agreed to and signed by the responsible oversight agency and the leadership of each participating agency. This MOU or CPP is to be used by the political leadership entity to provide oversight, coordination, dispute resolution, and keep the permitting process on track both within the state agencies and with federal partners.

Funding

Finally, the Roadmap needs a reliable source of long-term funding that provides assurances that state agencies can participate effectively from early engagement through CEQA adoption and permit issuance for offshore wind projects. The CEC and other natural resource agencies received funding in 2021 and 2022³ to assist in staffing and administrative costs associated with offshore wind development and the state's permitting responsibilities. While this is an important start, offshore wind development and associated permitting will occur over many years. A secure source of funding is necessary for agencies to provide the capacity to ensure timely offshore wind siting and permitting (through at least 2045), which will be necessary to successfully meet the full intent and purpose of the Roadmap.

² For example, the California Department of Fish and Wildlife (CDFW) not only will review any biological assessment, survey reports and studies, but they also may have specific requests related to surveys and studies that differ from their federal counterparts; the California Air Resource Board will likely want to review and approve the applicant's proposed air emissions modeling and analysis approach as well as any subsequent air emissions analysis and report; review by CDFW and the Coastal Commission of the analysis of potential impacts to commercial fisheries and associated marine related businesses would be needed, among others.

³ Assembly Bill (AB) 128, AB 179 and AB 205 included funding to the CEC and natural resource agencies for planning activities and administrative costs related to offshore wind development in California.



	Year 1		Year 2		Year 3		Year 4		Year 5		Year 6	
	Quarter											
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Permitting Framework*												
BOEM Auction/Lease												
Site Investigation and Construction and Operation Plan Preparation (assumes lease issuance 3 months after lease auction)												
Applicant Conducts Surveys/Prepares COP**												
BOEM Construction and Operation Plan (COP) Sufficiency Review												
BOEM Deems COP Sufficient/Complete												
CEQA and State Permitting												
Notice of Preparation of an Environmental Impact Report												
Prepare Draft Environmental Impact Report												
Notice of Availability of Draft Environmental Impact Report												
Prepare Final Environmental Impact Report/Response to Comments												
Notice of Availability of Final Environmental Impact Report/Response to Comments												
Issuance of a Notice of Determination (NOD)												
CDFW Section 1600 Streambed Alteration Agreement												
CDFW Incidental Take Permit												
CCC Consistency Certification (Coastal Development Permit)												
CSLC Tidelands Lease												
National Pollutant Discharge and Elimination System (NPDES) Construction General Permit												
Regional Water Quality Control Board Clean Water Act Section 401 Permit												
State Parks easement (beach crossing)												
Assembly Bill (AB) 52 Tribal Consultation												
State Agency Coordination/CEQA Review Participation (to facilitate the Roadmap)***												
BOEM NEPA EIS and Federal Permitting (Applicant Project)												
NEPA EIS Notice of Intent and Scoping												
Prepare Draft Environmental Impact Statement (EIS)												
Draft EIS Notice of Availability and Comment Period												
Prepare Final EIS												
Notice of Availability of Final Environmental Impact Statement												
Record of Decision (BOEM USACE, NMFS are signatories)												
USFWS/NMFS Endangered Species Act Section 7 Consultation												
Applicant Prepares Biological Assessments												
Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) Section 305(b) Essential Fish Habitat Consultation												
National Historic Preservation Act Section 106 Consultation												
CCC Consistency Certification (see State Process)												
Bald and Golden Eagle Protection Act Incidental Take Permit, Migratory Bird Treaty Act Compliance												
US Coast Guard Private Aids to Navigation Application												
Individual Permit pursuant to Section 10 of the Rivers and Harbors Act of 1899												
Individual Clean Water Act (CWA) Section 404 Permit												
Clean Air Act Outer Continental Shelf Permit												
Marine Mammal Protection Act (MMPA) IHA Permit												

*This timeline is presented to illustrate the complexities of permitting an offshore wind project in the State of California and the need for a coordinated state and federal process.
 **Note, there are several permits/consultations required at the site investigation stage not depicted here for activities in State Waters (e.g. consultation with SHPO, G&G survey permit from CSLC, etc.). In addition, many state agencies will want to weigh in on specific requests they have for site investigation and COP contents to meet their regulatory needs. Individual projects may not require all permits/approvals listed here and/or other permits/approvals may apply.
 ***This row is intended to illustrate the multiple points at which state agency coordination will be needed from site investigation/early engagement through the completion of the CEQA process.

ATTACHMENT B:

Transcript Excerpts

1 the raise-hand icon, looks like an open palm. And folks
2 on the phone, press star-nine to raise your hand, and
3 star six to unmute on your end. When you're called
4 upon, we'll open your line. Be sure to unmute on your
5 end, state, spell your name for the record, and give
6 your affiliation, if any. After which, you may begin
7 your comments. We're showing a timer on the screen, and
8 we'll alert you when your time is (AUDIO CUT OUT). So,
9 once again, all comments will be part of the public
10 record.

11 Start with the Varner Seaman. Please state
12 and spell your name. You may begin your comment.

13 MR. SEAMAN: Thank you. My name is Varner
14 Seaman, spelled V as in V-R-N-E-R, last name Seaman, S-
15 E-A-M-A-N, representing the American Clean Power
16 Association, California. First, I want to thank the CEC
17 staff and Commissioners for convening this workshop, and
18 for the many state, federal, and local agency staff and
19 principals who've come together in an all of government
20 approach to advance offshore wind in federal waters off
21 the California coast.

22 ACP California, in partnership with Offshore
23 Wind, California, has been consistently advocating for a
24 unified approach towards permitting offshore wind. We
25 very much appreciate the focus on state and federal

1 agency coordination and cooperation, and your commitment
2 to a permitting framework that is built on the successes
3 of past energy infrastructure permitting in California,
4 and is grounded in an interagency agreement like a
5 Memorandum of Understanding.

6 We also agree that this work can be
7 accomplished within the existing statutory framework.
8 An MOU can help clarify roles and responsibilities and
9 help facilitate appropriate concurrent versus sequential
10 reviews and approvals among all the state and federal
11 agencies with jurisdiction and equities in permitting
12 offshore wind off the coast of California. Together
13 with existing interagency agreements, an MOU will set
14 forward expectations and thus facilitate good
15 communication and coordination among all the various
16 agencies together with the offshore wind industry that
17 will be working together to permit offshore wind
18 facilities in an efficient and timely way and with good
19 environmental outcomes.

20 The Draft Conceptual Roadmap is a step in the
21 right direction and incorporates several of the ideas
22 that we and other stakeholders have shared with your
23 staff and other key resource agencies. We appreciate
24 that and want to continue to work with you to develop
25 efficient and effective permitting roadmap that will

1 enable the offshore wind industry to meet California and
2 the Biden administration's offshore wind goals.

3 It is in our collective and shared interest,
4 therefore, to establish a foundational document that
5 sets the course for successful project development and
6 permitting decisions over the next several years. The
7 wind industry has engaged with other stakeholders, and
8 we share an interest in a robust permitting roadmap that
9 is transparent, includes environmental review and
10 permitting milestones that are ambitious and achievable.

11 A clear and effective permitting roadmap will
12 reduce the risk of unnecessary delay and inefficient use
13 of agency resources, while increasing our overall
14 chances of success. To meet the state and BOEM'S goal
15 of spinning offshore wind turbines in the water by 2030,
16 we needed to start now and there is no time to waste.

17 A few things to note. We think that -- we
18 appreciate that there's the discussion of having a CEQA
19 lead agency that's designated as was referenced. We
20 think that's important in the final product. We also
21 would like to support including a timetable that has
22 early identification and consultation of cooperating
23 agencies and will help clarify roles and
24 responsibilities for every aspect of the environmental
25 review and permitting process and help ensure adequate

1 resources on planning at those agencies. Thank you very
2 much and we look forward to the ongoing opportunity to
3 collaborate.

4 MS. MURIMI: Thanks for your comment. Next,
5 we have Liz Klebaner, apologies if I've misstated your
6 name. Liz will be followed by Mike Conroy. Please
7 state and spell your name, give your affiliation, if
8 any, you may begin your comments.

9 MS. KLEBANER: Thank you. Good afternoon.
10 I'm Liz Klebaner, that's L-I-Z K-L-E-B-A-N-E-R. I'm
11 outside counsel to Anbaric Development Partners. I
12 would like to thank Commissioner Vaccaro and the
13 Commission staff for their work to support offshore wind
14 generation in California, and their candid and
15 thoughtful responses to stakeholder input in the
16 implementation of AB 525.

17 A little about Anbaric. Anbaric develops
18 transmission to accelerate the deployment of renewable
19 energy across North America, and specializes in the
20 design, development, financing, and construction at
21 large scale electric transmission system. Anbaric's
22 transmission expertise includes the design and
23 development of shared open access subsea transmission
24 systems for offshore wind. Building on prior models,
25 including the REAT and the San Francisco Bay Restoration

1 We applaud that this document is framed as a
2 living document. BOEM has recently changed how it
3 arrives at WEAs, as seen in the Gulf of Mexico and
4 Central Atlantic, and has been promised for both Oregon
5 and the Gulf of Maine. It is not outside the realm of
6 possibility that BOEM offers additional changes in its
7 post-lease processes in the future.

8 While many of the items contained in the
9 document are laudable, we must not let the desire for
10 doing something expeditiously be the enemy of doing
11 something completely and thoroughly. While offshore
12 wind has been positioned as necessary, and while we have
13 serious concerns about the BOEM process, particularly
14 with the siting decision making process, which is noted
15 above as changing, we don't argue that offshore wind may
16 have a role in our energy future. But we cannot stick
17 our heads in the sand and pretend that there are not
18 serious and significant concerns about the impacts. Not
19 only to the state's wild capture seafood industry, but
20 to the marine environment and ecosystem as well.
21 Thanks.

22 MS. MURIMI: Thank you. Next, we have Adam
23 Stern. Please state and spell your name, give your
24 affiliation if any. You may begin your comment.

25 MR. STERN: Yes, thank you. It's Adam Stern,

1 S-T-E-R-N, with Offshore Wind California, a trade group
2 that's representing the offshore wind industry. I want
3 to associate our thoughts with that of my colleague at
4 American Clean Power, Varner Seaman. We echo many of
5 the statements that he made. And I want to just augment
6 them by restating something that I asked in the Q&A
7 period -- which we strongly encourage the state, acting
8 through the governor's office, to develop the required
9 inter-agency agreements and the state and federal MOUs
10 for offshore wind permitting as soon as possible.

11 And one way to expedite this might be to draw
12 upon the successful MOUs that were arranged during the
13 Schwarzenegger and Brown administrations for onshore
14 renewables, but obviously adapting them to the unique
15 challenges associated with offshore wind and the
16 different agencies that have responsibilities for this.
17 I believe you alluded to this in some of the comments
18 that Eli Harland made in explaining the document, the
19 conceptual framework. But the MOU should involve
20 commitments from California agencies to meet performance
21 schedules developed in a way that are aligned with FAST-
22 41, ideally with the CEQA analysis progressing in
23 concert with the required NEPA analysis.

24 The MOU should address, among other
25 milestones, the timing of the federal and state

1 environmental reviews of both the lease sale and project
2 specific proposals, including Site Assessment Plans,
3 Construction and Operations Plans, Coastal Development
4 Permits, CZMA Consistency Determinations and
5 Certifications, State Lands Commission Leases and
6 related consultation requirements.

7 There also should be a framework that allows
8 for swift elevation of issues to policy level officials,
9 including the governor's office, with a reporting
10 structure that helps keep the process moving. Specific
11 issues that need to be addressed include the
12 alternatives analysis, the mitigation measures, and
13 other ways to avoid conflicting or duplicative measures,
14 ensuring that the agencies compare notes and coordinate
15 their analyses and conclusions regarding controversial
16 issues such as potential impacts to fisheries.

17 I want to, representing Offshore Wind,
18 California, applaud the work of all of the staff at CEC
19 and the other agencies that have worked on this. I
20 recognize that this is an ongoing process. We look
21 forward to working with you to ensure that the
22 conceptual framework turns into a actionable framework
23 to be used in the important processes that we have ahead
24 of us to realize the promise of offshore wind. Thank
25 you very much.