

**DOCKETED**

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<b>Description:</b>	Summary of 3/7/24 OSW TWG Comments (Comments provided after the AB 525 draft release on January 19, 2024).
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## **Summary of 3/7/24 OSW TWG Comments (Comments provided after the AB 525 draft release on January 19, 2024).**

Tribal representatives had the following concerns and recommendations:

- Tribal consultation or engagement does not mean that tribes support or consent to floating offshore wind development. Many tribal people actively oppose floating offshore wind development.
- Federally recognized and non-federally recognized tribes should be equally included and engaged in floating offshore wind development regardless of support or opposition.
- The federal entity and state entities should have consulted with tribes before initiating floating offshore wind development. By not soliciting tribal input early in the process, the state is repeating its pattern of resource extraction while dismissing tribal concerns and profiting off tribal lands. The federal entity and state entities are failing to acknowledge that tribal people have a history of ancestral stewardship responsibilities for natural and cultural resources.
- The federal entity and state entities should not be moving forward with floating offshore wind when there are still uncertainties regarding environmental impacts and there is not an adequate plan to guide development. Floating offshore wind is still an unproven, and unknown to be reliable technology.
- The federal entity and state entities language surrounding floating offshore wind is highly problematic because it assumes that floating offshore wind is inevitable. In reality, floating offshore wind is still a proposed project.
- The AB 525 offshore wind strategic plan does not reflect the years of comments, concerns, and unanswered questions that tribes have expressed to the federal entity and state entities regarding floating offshore wind (dating back to at least 2018).
- The AB 525 offshore wind strategic plan should contain a section at the beginning that elevates tribal concerns, even if tribal comments are not supportive of floating offshore wind. Tribal voices cannot be buried in a report that is hundreds of pages or included as footnotes.
- Rather than stating that the state conducted tribal engagement, the AB 525 offshore wind strategic plan should explicitly state tribal concerns. Without the inclusion of tribal concerns and feedback, the AB 525 offshore wind strategic plan is inaccurate and incomplete. It would be disrespectful to tribes and is a form of eraser if the state does not meaningfully incorporate tribal comments submitted to the docket into the final AB 525 offshore wind strategic plan.
- The state should have included tribes in the AB 525 offshore wind strategic plan from the beginning.

- The AB 525 offshore wind strategic plan does not provide a balanced view of floating offshore wind. The strategic plan should include tribal perspectives that oppose floating offshore wind. The strategic plan lacks any discussion addressing the certain negative impacts and uncertainties associated with floating offshore wind. The data gaps (e.g. the ocean floor and marine life) that have been referred to are alarming.
- Tribes should be entitled to Community Benefits Agreements (CBA) and other community benefits from floating offshore wind, even if they express opposition to floating offshore wind development.
- Tribes should be consulted and informed about how floating offshore wind related funds and grants are awarded and distributed including research funds and grants.
- The strategic plan should include a robust discussion of tribal energy sovereignty in regard to floating offshore wind development. Considering that several tribal people oppose offshore wind, tribes should not be forced to pay the increased energy rates that will be needed to fund the buildout of floating offshore wind. Tribes should have regulatory authority and a share of the profits.
- Tribal energy sovereignty gives tribes the decision to change course.

Comments Collected from Offshore Wind Tribal Working Group Attendees on 3/7/24.

Summary Approved by Offshore Wind Tribal Working Group Attendees on 3/14/24.