



Even Keel Wind

Lease OCS-P 0565

# **DRAFT Agency Communications Plan**

Prepared By:

**Invenergy California Offshore LLC**

## Version Updates

Version	Revision Date	Revision Description
1	09/29/2023	First draft submitted to BOEM includes initial comments from agencies
2	12/4/2023	Second draft submitted to BOEM includes revisions based on BOEM comments

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# 1 Introduction

This Agency Communications Plan (ACP) reflects the development of strategies and procedures the Even Keel Wind Project (project; Lease OCS-P 0565), owned and operated by Invenergy California Offshore LLC (Invenergy; Lessee Company Number 15152), will undertake to engage with federal, state, and local agencies regarding required permits and consultations. The ACP describes the approach for early and active information sharing, focused discussion of potential issues, collaborative identification of solutions to improve the quality and efficiency of agency decision-making processes, and promoting responsible development. The ACP identifies agency contacts and proposes communication methods to convey project information and solicit meaningful input.

It is anticipated that the ACP will evolve over time based on project activities and shared experiences of Invenergy, agencies, and other stakeholders. The ACP will be updated and refined periodically and made available via the [Even Keel Wind Project website](#).

The ACP complies with the terms of Lease OCS-P 0565 between Invenergy and the Bureau of Ocean Energy Management (BOEM). Development of Lease OCS-P 0565 will follow the requirements of offshore renewable energy and alternate use regulations at 30 Code of Federal Regulations Part 585 and other applicable statutes and regulations in existence. Invenergy will also see that the ACP is consistent with pending guidance from the California Energy Commission through their forthcoming permitting roadmap.

## 1.1 Overview of Project

Invenergy, a global renewable energy developer, is the project sponsor. Invenergy is an American-led team with over 20 years of experience developing clean energy solutions across the U.S. and globally. Invenergy and its affiliates have successfully developed more than 200 projects worldwide, comprising over 31 gigawatts of projects that are in operation, construction, or contracted.

On June 1, 2023, Invenergy executed an offshore wind lease in the Morro Bay Wind Energy Area. Lease OCS-P 0565 is located more than 20 miles from the closest location onshore and encompasses approximately 80,000 acres of the Outer Continental Shelf (OCS) (Figure 1). The project will include wind turbine generators and export cables connecting to California's onshore electrical grid.

Invenergy is establishing protocols for offshore and onshore data collection and surveys to characterize the project site. The data will support preparation and submittal of a Construction and Operations Plan (COP) to BOEM. Upon receipt of a complete COP, BOEM will provide a Notice of Intent to prepare an Environmental Impact Statement, which will initiate the process to analyze potential impacts of the project and identify proposed avoidance, minimization, mitigation, and monitoring measures.

## 1.2 Principles and Objectives

Invenergy recognizes the need for early coordination and communication with federal, state, and local agencies, and close collaboration with the other neighboring Morro Bay Wind Energy Area lessees. The ACP will guide communication and engagement through project development; the environmental review process; and construction, operation and maintenance, and decommissioning.

The ACP incorporates input received from BOEM and other federal, state, and local agencies on the draft ACP, which was provided to agencies prior to the agency meeting held by Invenergy on September 21, 2023. The ACP will also be refined as needed throughout the project lifespan as agency and stakeholder engagement progresses.

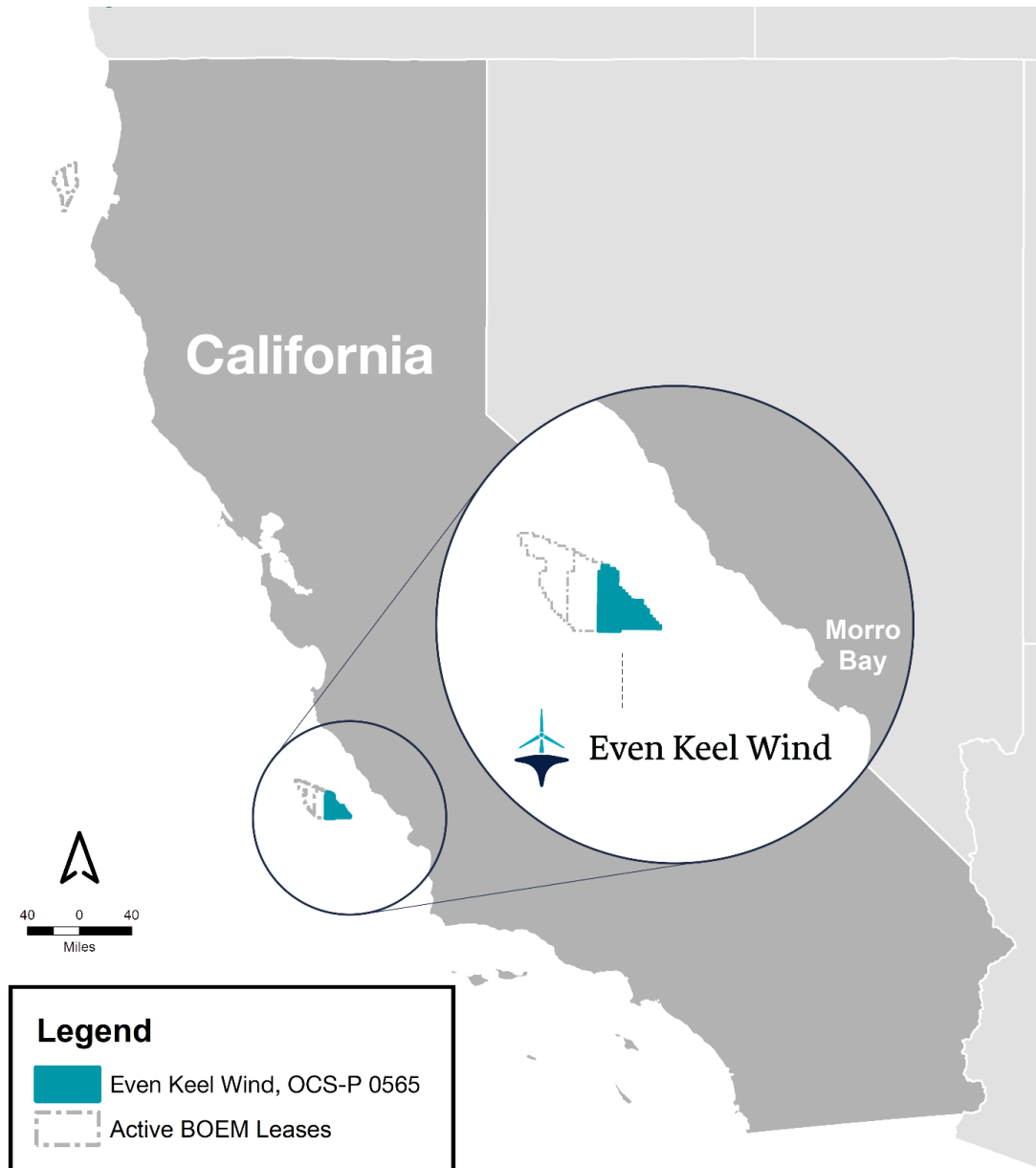


Figure 1. Lease Area OCS-P 0565

### 1.3 Agency Communications Plan Guiding Principles

Invenergy abides by the following guiding principles to facilitate agency involvement throughout project development; the environmental review process; and construction, operation and maintenance, and decommissioning:

- **Transparency and Accountability.** Invenergy collaborates and consults with agencies, communities, and other stakeholders at every stage of development, starting early to receive input, identify key issues, resolve challenges, and achieve buy-in.
- **Responsible Development.** Invenergy strives to site, construct, operate, and decommission projects responsibly, with the goal to minimize environmental and community impacts. Invenergy seeks input from agency experts on resource impacts and means to avoid, minimize, and mitigate such impacts.

- **Ongoing Monitoring.** Once projects are operational, Invenergy conducts ongoing monitoring to minimize risks to resources.

## 1.4 Agency Communications Plan Objectives

The ACP defines strategies and procedures that will guide Invenergy's engagement with federal, state, and local agencies regarding required permits and consultations for Lease OCS-P 0565 for the life of the project. Invenergy has identified the following objectives for the ACP:

- Provide consistent and timely updates on the project.
- Maintain a repository of accurate and current contact information for Invenergy, BOEM, and agency primary points of contact.
- Engage with agencies at key project stages, milestones, and deliverables.
- Facilitate focused discussion of potential issues.
- Allocate dedicated time and space for agencies and Invenergy to work toward collaborative solutions.
- Recognize agency staff and time constraints by providing clear, concise, and meaningful communications.

## 2 Agency Communication

Essential agency communication and coordination will occur between Invenergy and BOEM's Pacific Region point of contact. BOEM is responsible for offshore renewable energy development in federal waters. BOEM's Pacific Region facilitates the responsible development of renewable energy resources on the OCS through conscientious planning, stakeholder engagement, comprehensive environmental analysis, and sound technical review.

### 2.1 Primary Communication Team

Three primary points of contact have been designated:

- The **project permitting manager** will serve as primary point of contact regarding federal, state, and local project permits and approvals, including environmental review processes.
- The **BOEM project coordinator** will serve as the primary point of contact for BOEM regarding federal project permits and approvals, including environmental review processes.
- The **project agency liaison** will oversee implementation of the ACP on behalf of Invenergy. The agency liaison will be fully integrated with the larger project team, reporting to the permitting manager and engaging directly with agencies. The agency liaison will communicate directly with the primary points of contact identified for each agency and party listed in this ACP. Responsibilities of the agency liaison include, but are not limited to, the following:
  - Convey project milestones and updates, information requests, and anticipated opportunities and challenges.
  - Coordinate meetings and correspondence with the parties identified in this ACP.
  - Facilitate opportunities for Invenergy and agencies to work toward collaborative solutions.

Table 1 provides contact information for the primary communication team identified above.

**Table 1. Project Primary Points of Contact**

Role	Organization	Contact Name	Contact Information
Project Permitting Manager	Even Keel Wind	Wendy Greene	<a href="mailto:wgreene@invenergy.com">wgreene@invenergy.com</a> 630-658-9115
Bureau of Ocean Energy Management Project Coordinator	Bureau of Ocean Energy Management Pacific Region	Deanna Meier	<a href="mailto:Deanna.Meier@boem.gov">Deanna.Meier@boem.gov</a> 619-993-2045
Project Agency Liaison	Even Keel Wind	Shannon Stewart	<a href="mailto:sstewart@invenergy.com">sstewart@invenergy.com</a> 312-761-9089

### 2.2 Federal Agencies

Invenergy sent an introductory email to the federal agencies responsible for offshore wind project permits, consultations, and approvals, and to agencies with special expertise to confirm the appropriate points of contact and requested participation in the ACP process.

Table 2 lists applicable federal agencies and their roles and responsibilities. This table, and the ACP, will be updated and refined as project development progresses and specific agency engagement is undertaken.

**Table 2. Federal Agency Roles and Responsibilities**

Agency	Roles & Responsibilities
Bureau of Ocean Energy Management	National Environmental Policy Act (NEPA) Lead Agency, Outer Continental Shelf Lands Commercial Lease, Site Assessment Plan, Construction and Operations Plan, and survey plans.
Bureau of Safety and Environmental Enforcement	Authority for renewable energy development on the OCS focusing on safety and environmental compliance. Shared regulatory process with Bureau of Ocean Energy Management.
Federal Aviation Administration	Regulatory authority for the lighting of offshore structures. Potential cooperating agency for NEPA.
National Oceanic and Atmospheric Administration, National Marine Fisheries Service	Section 7 consultation under the Endangered Species Act, Marine Mammal Protection Act Incidental Harassment Authorization and Incidental Take Regulation/Letter of Authorization approval, Essential Fish Habitat consultation under the Magnuson-Stevens Fishery Conservation and Management Act. A Letter of Acknowledgment for scientific research and/or an Exempted Fishing Permit under the Magnuson-Stevens Fishery Conservation and Management Act. Likely cooperating agency for NEPA.
U.S. Army Corps of Engineers	Coordination related to Clean Water Act Section 404, 408, and Rivers and Harbors Appropriation Act Section 10 permitting. Likely cooperating agency for NEPA.
U.S. Coast Guard	Consultation related to private aids to navigation installed and maintained by anyone other than the U.S. Coast Guard. Likely cooperating agency for NEPA.
U.S. Department of Defense	Consultation related to national security maritime uses that occur within and surrounding the project area. Likely cooperating agency for NEPA.
U.S. Environmental Protection Agency	Implements and enforces the Clean Air Act requirements for the outer continental shelf sources offshore of California. Projects within 25 nautical miles of the state's seaward boundary are required to comply with the air quality and permitting requirements of the nearest or corresponding onshore area. Potential cooperating agency for NEPA.
U.S. Fish and Wildlife Service	Consultation related to Section 7 of the Endangered Species Act, Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, Fish and Wildlife Coordination Act, and Coastal Barrier Resource System. Likely cooperating agency for NEPA.
U.S. Navy	Consultation related to national security maritime uses that occur within and surrounding the project area. Potential cooperating agency for NEPA.

Table 3 lists the primary points of contact for each of the identified federal agencies based on preliminary information received from agencies. Invenergy has requested confirmation of this information from agencies and assistance filling gaps.

**Table 3. Primary Points of Contact for Federal Agencies**

Agency	Contact Information	
Bureau of Ocean Energy Management	Carlos Gomez, California Project Coordinator Deanna R Meier, Morro Bay Lease Coordinator ennifer Miller, Renewable Energy Section Chief	<a href="mailto:juan.gomez@boem.gov">juan.gomez@boem.gov</a> <a href="mailto:Deanna.Meier@boem.gov">Deanna.Meier@boem.gov</a> <a href="mailto:jennifer.miller@boem.gov">jennifer.miller@boem.gov</a>
Bureau of Safety and Environmental Enforcement	Cheri Hunter, Renewable Energy Operations Director	<a href="mailto:cheri.hunter@bsee.com">cheri.hunter@bsee.com</a>
Federal Aviation Administration	Cindy Whitten, OE Wind Turbine Team Manager	<a href="mailto:cindy.whitten@faa.gov">cindy.whitten@faa.gov</a>



Agency	Contact Information
National Oceanic and Atmospheric Administration, National Marine Fisheries Service	West Coast Region Office, Jennifer-Lilah Ise (Lilah) West Coast Offshore Wind Energy Coordinator <a href="mailto:jennifer.ise@noaa.gov">jennifer.ise@noaa.gov</a> Northwest Fisheries Science Center, Elizabeth Clarke <a href="mailto:elizabeth.clarke@noaa.gov">elizabeth.clarke@noaa.gov</a> Southwest Fisheries Science Center, Roger Hewitt <a href="mailto:roger.hewitt@noaa.gov">roger.hewitt@noaa.gov</a> Office of Protected Resources, Jaclyn Daly <a href="mailto:Jaclyn.Daly@noaa.gov">Jaclyn.Daly@noaa.gov</a>
U.S. Army Corps of Engineers	Aaron Allen, North Cost Branch Chief <a href="mailto:Aaron.O.Allen@usace.army.mil">Aaron.O.Allen@usace.army.mil</a> Theresa Stevens, Senior Project Manager <a href="mailto:Theresa.Stevens@usace.army.mil">Theresa.Stevens@usace.army.mil</a>
U.S. Coast Guard	Lieutenant Miranda E Brumbaugh Lieutenant USCG D11 <a href="mailto:Miranda.E.Brumbaugh@uscg.mil">Miranda.E.Brumbaugh@uscg.mil</a> CDR William George <a href="mailto:William.J.George@uscg.mil">William.J.George@uscg.mil</a> William Robinson <a href="mailto:William.A.Robinson@uscg.mil">William.A.Robinson@uscg.mil</a>
U.S. Department of Defense	DOD Clearinghouse <a href="mailto:osd.dod-siting-clearinghouse@mail.mil">osd.dod-siting-clearinghouse@mail.mil</a>
U.S. Environmental Protection Agency	Jason Gerdes, NEPA Reviewer <a href="mailto:Gerdes.Jason@epa.gov">Gerdes.Jason@epa.gov</a> Po-Chieh (Glen) Ting, Environmental Scientist <a href="mailto:Ting.PoChieh@epa.gov">Ting.PoChieh@epa.gov</a>
U.S. Fish and Wildlife Service	Noelle L. Rayman-Metcalf Endangered Species Biologist <a href="mailto:noelle_rayman@fws.gov">noelle_rayman@fws.gov</a> Stephen Henry, Field Supervisor <a href="mailto:steve_henry@fws.gov">steve_henry@fws.gov</a> Tracy Borneman Ecologist, Migratory Birds, Eagle Management <a href="mailto:tracy_borneman@fws.gov">tracy_borneman@fws.gov</a>
U.S. Navy	Muska Laiq CIV USN COMNAVREG SW SAN CA <a href="mailto:muska.laiq.civ@us.navy.mil">muska.laiq.civ@us.navy.mil</a> Steve Duboyce, Encroachment Manager <a href="mailto:stephen.a.duboyce.civ@us.navy.mil">stephen.a.duboyce.civ@us.navy.mil</a>

## 2.3 State and Local Agencies

Invenergy sent an introductory email to state and local agencies responsible for offshore wind project permits, consultations, and approvals to confirm the appropriate points of contact and request participation in the ACP process.

Table 4 lists state agencies and their roles and responsibilities. This table, and the ACP, will be updated and refined as project development progresses and focused agency engagement is undertaken.

**Table 4. State Agency Roles and Responsibilities**

Agency	Roles & Responsibilities
California Coastal Commission	Plans and regulates the use of land and water in the coastal zone under the California Coastal Act. The California coastal zone extends seaward to 3 nautical miles from shore, including all offshore islands, and extends inland to the coastal zone boundary. Lead consultation on Coastal Development Permit, survey activities, and site assessment plan.
California Natural Resources Agency	Oversees and supports more than 26 distinct California departments, conservancies, and commissions. Restores, protects, and manages the state's natural, historical, and cultural resources for current and future generations using creative approaches and solutions based on science, collaboration, and respect for all the communities and interests involved.

Agency	Roles & Responsibilities
California Department of Fish and Wildlife	Jurisdiction over the conservation, protection, and management of fish, wildlife, and habitat necessary for biologically sustainable populations of those species. In this capacity, the department administers the California Endangered Species Act, the Native Plant Protection Act, and other provisions of the California Fish and Game Code that afford protection to the state's fish, wildlife, and plant resources. Provides consultation on incidental take permit and consistency determination for species.
California Department of Conservation	Administers a variety of programs vital to California's public safety, environment, and economy. Its five divisions comprise Land Resource Conservation, Mine Reclamation, California Geological Survey, Geologic Energy Management, and State Mining and Geology Board.
California Department of Parks and Recreation	Also known as California State Parks, manages more than 280 park units, which contain the finest and most diverse collection of natural, cultural, and recreational resources to be found within California.
California Department of Transportation (Caltrans)	Manages more than 50,000 miles of California's highways and freeways, provides intercity rail services, permits more than 400 public-use airports and special-use hospital heliports, and works with local agencies on municipal and county transportation projects.
California Department of Water Resources	Protects, conserves, develops, and manages much of California's water supply, including the State Water Project that spans 700 miles from Northern to Southern California and supplies water to 27 million residents and 750,000 acres of farmland.
California Environmental Protection Agency (CalEPA)	Restores, protects, and enhances the environment, to ensure public health, environmental quality, and economic vitality. CalEPA consists of agencies, including California Air Resources Board and the State Water Resources Control Board, that regulate air, water and soil quality, pesticide use, and waste recycling and reduction.
California Fish and Game Commission	Responsibilities include establishing protected lands/waters (e.g., marine protected areas, wildlife areas and ecological reserves); regulating uses of protected areas; listing and delisting of threatened/endangered species under the California Endangered Species Act; accepting mitigation lands on behalf of the state; and leasing state water-bottom for shellfish cultivation.
California Office of Historic Preservation	Responsible for identifying, evaluating, and registering historic properties (any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register) and complying with federal and state regulatory obligations, including the National Historic Preservation Act.
California State Lands Commission	Primary land manager for lands underlying state marine waters. Authorized to lease state lands for uses that are consistent with the public trust protections involving navigable waterways. Consultation on geophysical survey permit and submerged lands lease application.
California State Water Resources Control Board	Works in coordination with regional water boards to preserve, protect, enhance, and restore water quality in the state's marine and inland waters. The regional water boards have jurisdiction over their designated regions out to 3 nautical miles. For projects that overlap more than one regional jurisdiction, the State Water Resources Control Board will review.
Central Coast Regional Water Quality Control Board	Mission to preserve, enhance, and restore the quality of California's water resources and drinking water for the protection of the environment, public health, and all beneficial uses. Coordinates on permits for applicable survey and data collection activities related to the U.S. Army Corps Nationwide Permit 6–Survey Activities. Administers pre-filing meetings 30 days prior to submittal of a Clean Water Act section 401 water quality certification request.
California Ocean Protection Council	Mission to protect California's coast and ocean by advancing innovative, science-based policy and management, making strategic investments, and catalyzing action through partnerships and collaboration. Plays a critical role in supporting studies that inform decision-making in matters concerning environmental considerations for the offshore wind sector.

Agency	Roles & Responsibilities
California Energy Commission	California's primary energy policy and planning agency. Assembly Bill 525 (Chiu, Chapter 231, Statutes 2021) requires the California Energy Commission to develop a permitting roadmap that describes time frames and milestones for a coordinated, comprehensive, and efficient permitting process for California offshore wind energy facilities.
California Independent Systems Operator	Oversees transmission infrastructure planning, operates a wholesale energy market, and manages the flow of electricity on the high-voltage, long-distance electric transmission lines.
California Public Utility Commission	Provides input on planning the bulk transmission system owned by investor-owned utilities. Has permitting authority and typically acts as a lead agency under the California Environmental Quality Act for transmission and distribution infrastructure owned by the investor-owned utilities.

Several counties and cities could be involved in permitting some portion of the project. Counties and cities with certified local coastal programs may conduct Coastal Act review and issue Coastal Development Permits within their areas of jurisdiction. County and city jurisdictions start at the mean high tide line and extend to the end of the coastal zone, which may vary based on location. A local Coastal Development Permit is required for development within the coastal zone. In addition, city permits could be required depending on the location and nature of offshore wind development and any ancillary portions of the project. Additional local ministerial approvals (such as grading, sewer, waste permits, and so forth) may also be required for offshore wind projects.

Table 5 lists the primary points of contact for state and local agencies. Invenergy has requested confirmation of this information from agencies and assistance with filling gaps.

**Table 5. Primary Points of Contact for State and Local Agencies**

Agency	Contact Information
California Coastal Commission	Holly Wyer, Senior Environmental Scientist <a href="mailto:holly.wyer@coastal.ca.gov">holly.wyer@coastal.ca.gov</a> Heather McNair, Environmental Scientist <a href="mailto:heather.mcnaair@coastal.ca.gov">heather.mcnaair@coastal.ca.gov</a>
California Natural Resources Agency	Jenn Eckerle Deputy Secretary for Oceans and Coastal Policy <a href="mailto:jenn.eckerle@resources.ca.gov">jenn.eckerle@resources.ca.gov</a>
California Department of Fish and Wildlife	Becky Ota, Habitat Conservation Unit Program Manager <a href="mailto:Becky.Ota@wildlife.ca.gov">Becky.Ota@wildlife.ca.gov</a> The California Department of Fish and Wildlife is in the process of creating a dedicated offshore wind email address that will be monitored by its offshore wind team. This email address will be added when available.
California Department of Conservation	To be determined
California Department of Parks and Recreation	To be determined Office of Historic Preservation <a href="mailto:info.calshpo@parks.ca.gov">info.calshpo@parks.ca.gov</a>
California Department of Transportation (Caltrans)	John Olejnik, Planning/IGR/Public engagement <a href="mailto:john.olejnik@dot.ca.gov">john.olejnik@dot.ca.gov</a>
California Department of Water Resources	John Andrew <a href="mailto:John.andrew@water.ca.gov">John.andrew@water.ca.gov</a>
California Environmental Protection Agency	Yana Garcia, Secretary for Environmental Protection <a href="mailto:Yana.Garcia@calepa.ca.gov">Yana.Garcia@calepa.ca.gov</a>
California Fish and Game Commission	Eric Sklar, President <a href="mailto:fgc@fgc.ca.gov">fgc@fgc.ca.gov</a> Melissa Miller-Henson, Executive Director <a href="mailto:Melissa@resources.ca.gov">Melissa@resources.ca.gov</a>

Agency	Contact Information	
California Office of Historic Preservation	Jeff Brooke, Associate State Archaeologist	<a href="mailto:Jeff.Brooke@parks.ca.gov">Jeff.Brooke@parks.ca.gov</a>
California State Lands Commission	Amy Vierra, Renewable Energy Specialist Jennifer Mattox, Environmental Program Manager	<a href="mailto:Amy.Vierra@slc.ca.gov">Amy.Vierra@slc.ca.gov</a> <a href="mailto:jennifer.mattox@slc.ca.gov">jennifer.mattox@slc.ca.gov</a>
California State Water Resources Control Board	Eileen Sobeck, Executive Director	<a href="mailto:Eileen.Sobeck@waterboards.ca.gov">Eileen.Sobeck@waterboards.ca.gov</a>
Central Coast Regional Water Quality Control Board	Kathleen Hicks, Environmental Scientist Phil Hammer, Storm Water Program Manager	<a href="mailto:Kathleen.Hicks@Waterboards.ca.gov">Kathleen.Hicks@Waterboards.ca.gov</a> <a href="mailto:Phillip.Hammer@waterboards.ca.gov">Phillip.Hammer@waterboards.ca.gov</a>
California Ocean Protection Council	Jenn Eckerle Ocean Protection Council Executive Director Yi-Hui Wang, Offshore Wind Program Manager Justine Kimball Senior Climate Change Program Manager	<a href="mailto:jenn.eckerle@resources.ca.gov">jenn.eckerle@resources.ca.gov</a> <a href="mailto:Yi-Hui.Wang@resources.ca.gov">Yi-Hui.Wang@resources.ca.gov</a> <a href="mailto:justine.kimball@resources.ca.gov">justine.kimball@resources.ca.gov</a>
California Energy Commission	Elizabeth Barminski, Offshore Wind Program Specialist Eli Harland, Associate Energy Specialist Rachel MacDonald Siting, Transmission, and Env Protection Division	<a href="mailto:elizabeth.barminski@energy.ca.gov">elizabeth.barminski@energy.ca.gov</a> <a href="mailto:eli.harland@energy.ca.gov">eli.harland@energy.ca.gov</a> <a href="mailto:rachel.macdonald@energy.ca.gov">rachel.macdonald@energy.ca.gov</a>
California Independent Systems Operator	Ebrahim Rahimi, Senior Advisor, Regional Transmission	<a href="mailto:erahimi@caiso.com">erahimi@caiso.com</a>
California Public Utility Commission	Leuwam Tesfai Deputy Executive Director for Energy and Climate Policy	<a href="mailto:Leuwam.tesfai@cpuc.ca.gov">Leuwam.tesfai@cpuc.ca.gov</a>
City of Morro Bay	Carla Wixom, Mayor Yvonne Kimball, City Manager Ted Schiafone, Harbor Director	<a href="mailto:cwixom@morrobayca.gov">cwixom@morrobayca.gov</a> <a href="mailto:ykimball@morrobayca.gov">ykimball@morrobayca.gov</a> <a href="mailto:tschiafone@morrobayca.gov">tschiafone@morrobayca.gov</a>
Monterey Bay Resources Air District	Richard Stedman, Air Pollution Control Officer	<a href="mailto:rstedman@mbard.org">rstedman@mbard.org</a>
Monterey County	Erik V. Lundquist Director of Housing and Community Development	<a href="mailto:lundquiste@co.monterey.ca.us">lundquiste@co.monterey.ca.us</a>
San Luis Obispo County	Air Pollution Control District Andy Mutziger Division Manager–Planning, Monitoring & Grants Dora Drexler Division Manager – Engineering & Compliance Susan Strachan Decommissioning Manager Rebecca Campbell Assistant County Administrative Officer	<a href="mailto:amutziger@co.slo.ca.us">amutziger@co.slo.ca.us</a> <a href="mailto:ddrexler@co.slo.ca.us">ddrexler@co.slo.ca.us</a> <a href="mailto:sstrachan@co.slo.ca.us">sstrachan@co.slo.ca.us</a> <a href="mailto:rcampbell@co.slo.ca.us">rcampbell@co.slo.ca.us</a>
Port San Luis	Suzy Watkins, Harbor Director	<a href="mailto:SuzyW@portsanluis.com">SuzyW@portsanluis.com</a>

## 3 Communication Methods

The project agency liaison will work closely with BOEM to identify coordination opportunities and will regularly engage with the agency contacts identified in the ACP. Invenergy will continually seek feedback on the approach to the ACP and will adapt the ACP where appropriate to identify critical path items and allow for resource allocation within and among the various agencies.

Through a combination of outreach methods described in the following sections, Invenergy will 1) regularly share project schedule, milestones, status, and planned activities with Tribe and agency contacts; 2) clearly identify challenges and solutions related to permits and resources associated with the project; and 3) maintain open lines of communication with agencies, Tribes, and state stakeholders.

Coordination will occur through a combination of in-person or virtual meetings, conference calls, and email or hard copy correspondence.

### 3.1 Initial Outreach

Invenergy hosted an initial meeting with agencies on September 21, 2023, to introduce Invenergy and describe the anticipated development process for the project. The meeting also provided an opportunity to receive input on the ACP. A draft version of the ACP was provided ahead of the meeting to allow an opportunity for agency review. This version of the ACP incorporates input received to date.

If an agency responds in writing that it does not wish to participate in the ACP, the agency will no longer be included in ACP communications; and the change will be documented in the ACP. A decision not to participate in the ACP does not change the agency's regulatory authority nor the need for Invenergy to communicate with the agency. If an agency does not respond to outreach, Invenergy will continue to solicit participation in ACP engagement opportunities until the agency provides a written response.

### 3.2 Ongoing Communication

Invenergy will coordinate with agencies at various points in project development to respond to inquiries, share information, collaborate on approaches, and resolve issues as they arise. These meetings will typically be held one-on-one with agencies and will focus on a specific issue of concern, such as resources, geography, or other topic of interest. Meetings may be virtually or in-person depending on agency preference and may be held monthly, quarterly, bi-annually, or annually depending on the wishes of the agency. When possible, the objective of these meetings will be identified prior to the meeting (e.g., information purposes, lease compliance, regulatory requirements). Other means to communicate include conference calls, email, newsletters, and website postings. Invenergy will communicate as needed with agencies throughout the project's life cycle to:

- Answer questions and inquiries
- Respond to data requests
- Identify the applicable surveys, studies, and impact analyses to be performed for the project and gather feedback
- Provide data and findings, as appropriate, from surveys, studies, and analyses
- Discuss potential impacts and means to avoid, minimize, and mitigate impacts
- Identify science and partnership opportunities
- Provide reports as required by the lease (e.g., avian annual reports, progress reports, monitoring reports)
- Provide updated project milestones and schedule
- Project design details, as applicable (e.g., cable routes)

The California Energy Commission released the *Assembly Bill 525 Offshore Wind Energy Permitting Roadmap* in May 2023 to propose timeframes, milestones, and processes to provide a coordinated and efficient offshore wind energy permitting process. That document references the ACP. Additionally, in Appendix B, there is a conceptual interagency agreement approach from December 2022 recommending that permitting agencies jointly meet with lessees at least quarterly, or at an otherwise agreed upon time, through the permitting process so as to receive updates and resolve issues raised from stakeholders. Once the official roadmap is published, Invenergy will coordinate with agencies in accordance with the California Energy Commission's guidance.

If at any time an agency has a question, follow-up question, or would like to request information not identified in the ACP, the information request(s) may be submitted via phone, email, or meeting, as requested by the agency. The information request(s) should be submitted to the project permitting manager or project agency liaison (Table 1).

### 3.3 Agency Communication Log

Invenergy will maintain an agency communication log to include letters, meeting notes, call logs, and/or emails where substantive information has been discussed or received. The agency communication log will be used to inform project progress reports described below.

### 3.4 Coordination with Command Headquarters

In accordance with the terms of Lease OCS-P 0565, Invenergy will establish early contact and maintain ongoing communication with appropriate command headquarters. Invenergy will provide advance notice of activities that could potentially impact military operations.

### 3.5 Progress Reports

To encourage transparency and to comply with the terms of Lease Agreement OCS-P 0565, Invenergy will submit a public-friendly draft progress report to BOEM every six months through COP approval, unless otherwise directed by BOEM. Relevant to the ACP, the draft progress report will include the following:

- A brief narrative of engagement objectives and completed activities.
- A copy of the agency communication log.
- A description of agency feedback and how such feedback has been addressed (when appropriate).
- A list of anticipated or scheduled engagement activities for the next reporting period.

If at any time an agency has a question, follow-up question, or would like to request information not identified in the BOEM Progress Reports, the information request(s) may be submitted via phone, email, or meeting, as requested by the agency. The information request(s) should be submitted to the project permitting manager or project agency liaison (Table 1).

### 3.6 Project Website

The [Even Keel Wind Project website](#) will serve as a primary source of information for the project. Invenergy will distribute outreach and educational materials on the website, which will offer updates and provide links to information on the regulatory process and other important stakeholder issues. The website will also share information on survey plans, including survey types, locations, and schedules. As the site assessment phase of the project advances, project-related data and reports will be posted, as feasible. The most current version of the ACP will be stored in the document library on the website. The website will also include a comment form by which visitors can contact Invenergy directly.

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## 3.7 Planning for Subsequent Project Stages

As the project development progresses, Invenergy will coordinate with applicable federal, state, and local agencies at significant phases of the project, including but not limited to:

- **Surveys and Data Collection.** This phase of activity will include data collection and survey campaigns such as geophysical, geotechnical, and benthic surveys. The agency liaison will develop survey plans for data collection campaigns in accordance with the ACP and lease requirements and share those plans with BOEM and other appropriate agencies. The Agency Liaison will hold presurvey meetings with BOEM and other appropriate agencies a minimum of two weeks following distribution of survey plans to discuss and solicit feedback. After survey and data collection campaigns, the agency liaison will share the data and findings with BOEM and other appropriate agencies.
- **Layout, Design, and COP Preparation.** The agency liaison will meet with appropriate agencies to share information on wind farm design and layout and solicit input on those parameters. The agency liaison will use agency input received through ongoing engagement to inform the wind farm design and layout (e.g., wind turbine generators, offshore substation foundations, inter-array cables, and export cable routes) presented and analyzed in the COP. The agency liaison will also coordinate pre-COP and design meetings outlined in BOEM's Information Needed for Issuance of a Notice of Intent Under the National Environmental Policy Act for a Construction and Operations Plan.
- **Construction and Installation.** The agency liaison will meet with appropriate agencies to share information on project construction and installation means and methods and solicit input ahead of these efforts. Leading into construction and installation activities, the ACP will be further refined and reviewed with agencies and other stakeholders to facilitate ongoing communication and engagement.
- **Operations and Maintenance.** The agency liaison will meet with appropriate agencies to share information regarding project operations and maintenance and to solicit input. Leading into operations and maintenance, the ACP will be further refined and reviewed with agencies and other stakeholders to facilitate ongoing communication and engagement.
- **Decommissioning.** The agency liaison will meet with appropriate agencies to share information on project decommissioning and to solicit input. Prior to decommissioning, the ACP will be updated to address this final phase of the project. This will include preparing the decommissioning application and notice in addition to any new requirements at that time.

As previously stated, the ACP will evolve based on project activities. This evolution will be based on shared experiences of Invenergy, agencies, Tribal governments, and stakeholders, and will require the continued engagement and dedication of all parties to be effective.



## 4 Coordination of Engagement Across Leases

Morro Bay Wind Energy Area lessees have begun engaging with each other in collaborative meetings, with the shared goal of reducing burdens on resource-limited agencies and stakeholders. Invenergy will continue to collaborate with these lessees and agencies, specifically agreeing to the following shared objectives for agency communication:

- To work together to identify innovative avoidance, minimization, mitigation, and monitoring measures based on industry best practices both domestically and globally.
- To seek opportunities to collaborate on data collection, analyses, science, and siting decisions.
- To seek opportunities to meet as a group on select topics to reduce the need for individual meetings with agencies.
- Endeavor to meet jointly in other forums and/or request joint presentations/agenda items at various working group and stakeholder meetings to reduce the need for individual presentations.

Invenergy welcomes agency comments and suggestions to further coordinate with Morro Bay Wind Energy Area lessees throughout this effort.