

**DOCKETED**

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<b>Project Title:</b>	Assembly Bill 3 California Offshore Wind Advancement Act
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<b>Docketed Date:</b>	7/10/2025

*Comment Received From: Blue Lake Rancheria Tribe  
Submitted On: 7/10/2025  
Docket Number: 25-AB-03*

**Blue Lake Rancheria's Comments on Assembly Bill 3 -  
California Offshore Wind Advancement Act**

*Additional submitted attachment is included below.*

**From:** [Madison Hunt](#)  
**To:** [Energy - Docket Optical System](#)  
**Cc:** [Jason Ramos](#); [Heidi Moore-Guynup](#); [Graves, Sierra@Energy](#)  
**Subject:** RE: Blue Lake Rancheria's Comments on Assembly Bill 3 (25-AB-03) - California Offshore Wind Advancement Act  
**Date:** Thursday, July 10, 2025 3:35:39 PM  
**Attachments:** [BLR\\_AB3\\_CommentLetter.pdf](#)

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Dear Director Sierra Graves,

On behalf of the Blue Lake Rancheria Tribe, I am submitting the attached comment letter in response to the California Offshore Wind Advancement Act (25-AB-03) and the upcoming reports required by this legislation. We commend the CEC's commitment to collaborate and consult with Tribal governments in the development of these crucial reports.

As a sovereign Tribal nation with inherent rights and responsibilities to its ancestral lands, waters, and cultural resources, the Blue Lake Rancheria acknowledges the importance of transitioning to renewable energy sources, including offshore wind, in addressing climate change. However, it is paramount that the development of such projects proceeds in a manner that respects tribal sovereignty, protects cultural and natural resources, and ensures equitable benefits for Tribal communities. Our detailed comments are provided in the attached letter, which is structured around the two required reports.

For more information or to contact our leadership, please contact Heidi Moore-Guynup, Director of Tribal and Government Affairs ([hguynup@bluelakerancheria-nsn.gov](mailto:hguynup@bluelakerancheria-nsn.gov)).

Thank you for your attention to our comments and for recognizing the sovereign status in this process. We look forward to your response and to continued collaboration on matters of mutual interest.

Respectfully submitted,

Madison Hunt  
[Blue Lake Rancheria](#)

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# BLUE LAKE RANCHERIA

P.O. Box 428  
Blue Lake, CA 95525

Office: (707) 668-5101  
Fax: (707) 668-4272

[www.bluelakerancheria-nsn.gov](http://www.bluelakerancheria-nsn.gov)



**July 9, 2025**

Sierra Graves  
Director of Tribal Affairs  
California Energy Commission  
Docket Unit, MS-4  
Docket No. 25-AB-03  
715 P Street  
Sacramento, California 95814

*Submitted via email to [docket@energy.ca.gov](mailto:docket@energy.ca.gov)*

**RE: Blue Lake Rancheria's Comments on Assembly Bill 3 (25-AB-03) - California Offshore Wind Advancement Act**

Dear Director Graves,

The Blue Lake Rancheria deeply appreciates the opportunity to provide comments on Assembly Bill 3 (AB 3), the California Offshore Wind Advancement Act (COWAA), and the upcoming reports required by this legislation: The Second-Phase Plan for Seaport Readiness and the Supply Chain Feasibility Study. We commend the CEC's commitment to collaborate and consult with tribal governments in the development of these crucial reports.

As a sovereign tribal nation with inherent rights and responsibilities to our ancestral lands, waters, and cultural resources, the Blue Lake Rancheria acknowledges the importance of transitioning to renewable energy sources, including offshore wind, in addressing climate change. However, it is paramount that the development of such projects proceeds in a manner that respects tribal sovereignty, protects cultural and natural resources, and ensures equitable benefits for tribal communities.

Our comments are structured around the two required reports:

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## Report 1: Second-Phase Plan for Seaport Readiness (PRC Section 25991.8)

The development of a robust seaport readiness strategy is vital for the success of California's offshore wind industry. From the perspective of the Blue Lake Rancheria, we urge the CEC and consulting agencies to ensure this plan thoroughly addresses and mitigates potential impacts on tribal communities and resources, while also identifying opportunities for tribal participation.

Specifically, we request that the plan include:

- **Comprehensive Cultural Resource Protection:** Detailed strategies for identifying, protecting, and preserving tribal cultural resources (TCRs) and sacred sites that may be impacted by seaport expansions, dredging, increased vessel traffic, or associated onshore infrastructure development. This must include robust, early, and meaningful consultation with all potentially affected tribes, incorporating Traditional Ecological Knowledge (TEK) and tribal cultural values into impact assessments and mitigation planning.
- **Marine Resource Protection:** An assessment of potential impacts on traditional fishing grounds, marine ecosystems, and species vital to tribal subsistence and cultural practices. The plan should outline measures to avoid, minimize, and mitigate adverse effects on these resources, developed in consultation with tribal fisheries experts.
- **Economic Opportunities:** Identification of specific opportunities for tribal enterprises and tribal members in seaport development, operations, logistics, and related industries. This could include contracting, subcontracting, and workforce development programs tailored to tribal communities.
- **Access and Usability:** Consideration of how increased port activity might affect tribal access to traditional coastal areas, waterways, and resources.
- **Environmental Justice:** An explicit analysis of how seaport development will affect environmental justice communities, including tribal communities, and strategies to prevent disproportionate burdens.



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## Report 2: Supply Chain Feasibility Study (PRC Section 25991.9)

The feasibility study for achieving 50 percent and 65 percent in-state assembly and manufacturing, along with domestic content thresholds, presents a significant opportunity for economic growth within California. For tribal nations, this study should explore how this growth can be inclusive and beneficial.

We recommend that the study:

- **Tribal Business Integration:** Identify pathways and incentives for tribal businesses to participate directly in the offshore wind supply chain, including manufacturing, assembly, maintenance, and related services. This could involve partnerships, capacity building, and preferential contracting.
- **Workforce Development:** Propose specific programs and funding mechanisms to train and employ tribal members in the skilled trades and technical roles required for offshore wind manufacturing and assembly. This should leverage existing tribal educational and workforce development initiatives.
- **Sustainable Practices:** Emphasize and prioritize supply chain practices that are environmentally sustainable and minimize impacts on natural resources, particularly those of cultural significance to tribes.
- **Regional Economic Benefits:** Analyze how the distribution of manufacturing and assembly facilities can provide equitable economic benefits across different regions of California, including those adjacent to tribal lands.

## Overarching Recommendations for Tribal Engagement

Beyond the specific content of the reports, the Blue Lake Rancheria respectfully requests that the CEC to implement the following principles for tribal engagement throughout the AB 3 process:

- **Early and Continuous Engagement:** Consultation must begin at the earliest possible stages of planning and continue throughout the entire lifecycle of offshore wind development, including site selection, permitting, construction, operation, and decommissioning.
- **Meaningful Consultation:** Consultation should go beyond mere information sharing and involve genuine dialogue aimed at achieving consensus and

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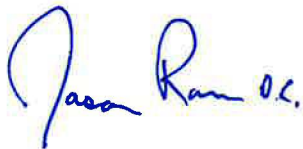
incorporating tribal perspectives, concerns, and recommendations into decision-making. This includes providing adequate time for tribal review and response.

- **Dedicated Tribal Working Group:** Consider establishing a formal tribal working group or advisory committee specifically for offshore wind development to ensure consistent and structured tribal input.
- **Data Sharing and TEK Integration:** Develop protocols for sharing relevant data with tribes and for respectfully integrating Traditional Ecological Knowledge into all assessments and planning efforts, ensuring data sovereignty.
- **Resource Allocation:** Ensure adequate resources (staff, funding) are dedicated to supporting meaningful tribal consultation and participation.

The Blue Lake Rancheria is committed to working collaboratively with the CEC and all stakeholders to ensure that California's offshore wind energy goals are achieved in a way that is environmentally responsible, economically beneficial, and culturally respectful. We look forward to continued engagement and contributing our unique perspectives to these important endeavors.

Thank you for your consideration of these comments.

Sincerely,



Jason Ramos,  
Tribal Chairman

(CC California Assembly Member Damon Connolly, California Assembly Member Chris Rogers)