

| DOCKETED | |
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| Docket Number: | 25-AB-03 |
| Project Title: | Assembly Bill 3 California Offshore Wind Advancement Act |
| TN #: | 265656 |
| Document Title: | Inter-Tribal Student Services Comments - AB 3 Report 2 In-State Assembly, Supply Chain, and Workforce Feasibility Scoping Document and Literature Assessment |
| Description: | N/A |
| Filer: | System |
| Organization: | Inter-Tribal Student Services |
| Submitter Role: | Public |
| Submission Date: | 8/18/2025 12:55:47 PM |
| Docketed Date: | 8/18/2025 |

Comment Received From: Inter-Tribal Student Services
Submitted On: 8/18/2025
Docket Number: 25-AB-03

AB 3 Report 2 In-State Assembly, Supply Chain, and Workforce Feasibility Scoping Document and Literature Assessment

Thank you for the opportunity to comment on the Assembly Bill 3 In-State Assembly, Supply Chain, and Workforce Feasibility Scoping Document and Literature Assessment. Please find the attached letter on behalf of Inter-Tribal Student Services. We look forward to working with the CEC on the study.

Additional submitted attachment is included below.



Inter-Tribal Student Services
1772 I Street
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8/17/2025

California Energy Commission
Docket No. 25-AB-03
715 P Street
Sacramento, CA 95814

RE: Assembly Bill 3, Report 2: In-State Assembly, Supply Chain, and Workforce Feasibility Scoping Document and Literature Assessment

Dear Chair Hochschild and Commissioners,

The Redwood Region has endured devastating boom-and-bust cycles associated with extractive industries like mining, logging, cannabis and energy production developments such as dams. These industries exploited natural resources and people to primarily benefit those outside our region, resulting in significant environmental damage, violence, a legacy of underinvestment, and unfulfilled promises of restoration. Local Tribal Nations experienced land theft and state-sanctioned genocide, and continue to face some of the highest rates of Missing and Murdered Indigenous Peoples (MMIP) in the US, necessitating [*specific safety guardrails*](#) for future development. Today, our communities face challenges from a lack of capacity, infrastructure, and community services, exacerbated by chronic underinvestment. These needs are deeply felt across our region.

Despite this, over time the Redwood Region has built proven place-based solutions and undertaken rigorous research to chart our future, guided by coalitions of local leaders and institutions, for example the recent [*Redwood Region RISE/California Jobs First initiative*](#), [*Tribally-led coalitions to remove destructive Klamath River Dams and restore the Basin*](#). This is why it is **imperative that offshore wind is developed in close and ongoing collaboration with Tribal Nations and Local Communities** to ensure that urgently needed climate action and renewable energy are done in a manner that benefits and uplifts the region from the beginning.

Specifically, as a host community for Federal and State Offshore Wind (OSW) Energy in California, we believe **there must be a markedly different approach to OSW Workforce and Supply Chain Development**. One that accounts for this history and consequent current conditions. This approach must prioritize reversing patterns of resource and community extraction. It must involve California setting a new course of reinvestment and healing for the region that leads to long-term, long-overdue prosperity. This will require investments in intergenerational prosperity that ultimately transcend any one industry.

The following **pillars for equitable and sustainable OSW WFSC** can guide us toward this new approach:

Tribal and Community Ownership, to build regional wealth and enduring economic wellbeing, promote Tribal ownership opportunities and the use of Tribal-owned contractors and businesses. Ensure the creation of ownership pathways such as public investments and incentives, partnerships and business mentorships, and licensing and bonding, for Tribal Nation and underserved community enterprises. Evidence of national best and proven practices are documented within recent reports from the National Congress of American Indians (NCAI) [*Building Tribal Economies Toolkit*](#) and The Urban Institute's [*Community Ownership and Self Determination*](#).

Regional Youth and Young Adult (16-25) Opportunities, to uplift marginalized or at-risk populations as they encounter adult systems and to strengthen the region's trajectory. Partner with Regional providers to design and implement community appropriate internships, mentorships, and entry-level job opportunities while coordinating with organizations engaged in ensuring holistic success, as evidenced with the [*Del Norte Building Healthy Communities*](#) program and initiatives of the [*Northern California Indian Development Council*](#) (NCIDC). These priority communities are emphasized in [*Humboldt County Workforce Development Board's plan*](#). We emphasize the need to grow universal pathways and skillsets that are applicable to a diverse set of opportunities and regional demands, ultimately helping to stabilize economic cycles and ensure holistic local economies.

Training, Education, Certification, and Learning Support Systems, to meet the specific needs of the Region's remote, underserved, low-income populations it is essential to engage early and intentionally with the region's education institutions which will be best positioned for the training needs to come. Continuing and growing the state's investment in these institutions is imperative. This includes [*Cal Poly Humboldt*](#) with deep technical and cultural expertise such as with the [*COMPASS Indian Natural Resources, Science, and Engineering Program*](#) (COMPASS INRSEP), the [*Schatz Energy Research Center*](#), newly launched mechanical engineering program, and the [*Multicraft Core Curriculum \(MC3\) pre-apprenticeship*](#) program; the [*College of the Redwoods*](#) specializing in workforce and professional pathways, and Tribally focused organizations such as the California Indian Manpower Consortia with initiatives such as the [*High Road Training Project*](#).

Innovative Financing and Funding Partnerships, to facilitate fair local participation in a globally competitive market, new investing avenues must be opened to capitalize local and Tribal ventures, to reduce risks for first-time local entrepreneurs and their investing partners, and create access to new ways for the region to secure finance, both public and private, to support OSW industry supply chains. [*Impact Investing*](#) is one key avenue that has a robust marketplace and analysis, as is [*social and environmental impact municipal bonds*](#). A recent Forbes article headlines "[*Why Native Communities are the Future of Impact Investing*](#)" citing millions of dollars in economic impact for every dollar invested through a Native CDFI.

Public Investments in Regional Infrastructure, to reduce burden and risk for siting OSW industry and economic activities, prerequisite investments in long-overdue infrastructure systems will be required. In particular, equitable and resilient energy transmission and distribution, affordable and low-income housing, water treatment systems, roadway upgrades, health and child care systems, and region-wide access to reliable, and high-speed internet, [*well expressed in Del Norte County's CEDS Plan*](#), for example. When these requirements are taken together, they necessitate investment in planning, zoning,

and updated support for local governments. Crucial and detailed research by the [County of Humboldt's Economic Development](#) division provides specific recommendations to be released shortly.

Public Policies that Preference Host Regions and Tribal Nations, to level the economic playing field will require closely partnering with the State of California to set smart, equitable and fair public policies as new industry is chartered, as underscored by the [Roosevelt Institute](#). For example, setting procurement goals to prioritize sourcing goods and services from Tribally owned, minority-owned, and other underrepresented businesses in all contracts and subcontracts associated with offshore wind development. Additionally, establishing binding levels for local workforce hires from underrepresented communities, including women and Tribal members, and [Tribal Benefit Agreements](#), particularly when projects gain public or State resources. These practices are known to strengthen communities hosting large industries.

Enforceable Structures that Prioritize Safety and Mitigate Harm, to ensure long-term security and stewardship of the Region's residents and ecosystems. Impacts of the offshore wind industry on the human, marine and coastal environments are front of mind for the Redwood Region. Having paid incalculable costs for California's growth, with Native American communities bearing grave, multigenerational harms and attempted erasure, the removal of crucial mechanisms for participation and input, such as CEQA, present threats to this safety. This has been detailed in many [Tribal and regional public comments](#) since the original Public Sale Notice by the Bureau of Ocean Energy Management, US Dept. of Interior.

Key Recommendations:

1. **Incorporate the above pillars for equitable and sustainable OSW WFSC as first principles for collaborating with Host Regions**, including the Redwood Region and Tribal Nations.
2. **Support Regionally-Led Expertise and Priorities:** Many institutions, authorities, and leaders have undertaken research, regional assessments, and deep engagement with community members. The CEC should prioritize these findings and goals in their work. This includes but is not limited to:
 - Schatz Energy Research Center [Reports](#) ([WFSC](#), [Transmission](#), [Transmission Alternatives](#))
 - Pacific Offshore Wind Consortium [Reports](#)
 - Redwood Region RISE ([Renewable Energy](#), [Blue Green Economy](#))
 - County of Humboldt County Economic Development Report ([CEDS](#)) and Offshore Wind Supply Chain and Workforce Analysis (XODUS *forthcoming*)
 - Humboldt County's [WindLink](#) Program
 - College of the Redwoods [Master Plan](#)
 - Many of the region's Tribal Nations and Community Organizations [submitted comments in 2024](#), and these priorities remain crucial for AB3
3. **Participate In-Person with Communities on CEC-Identified Gaps and a Learning Agenda.** It is mission critical for the success of this work to co-design and participate in local activities and

engagements with Tribes and community-based organizations. This will generate new insights and stimulate solutions crucial for the CEC specific gaps it is required to evaluate and include in its final report, including “(9) *Develop recommendations for incorporating equity and environmental justice in economically and environmentally sustainable supply chain development.* (10) *Coordinate with tribal governments to develop recommendations for tribal workforce development opportunities* (11) *Consult with environmental and environmental justice groups, fisheries groups, labor unions, including manufacturing, transportation, maritime, and longshore unions, oceangoing vessel operators, the commercial maritime industry, public port authorities, and business groups to develop recommendations for workforce development opportunities* (12) *Develop recommendations for workforce development investments at community colleges, by the California Workforce Development Board for maritime and longshore workforces, at state universities, and in apprenticeship programs necessary to meet the workforce needs resulting from the in-state targets described in this section.* (13) *Consult with building and construction trades councils to develop recommendations on the use of project labor agreements to achieve workforce development and apprenticeship goals.*”

Such examples might include:

- A series of convenings with Tribal Nations and Enterprise Leads, workforce and supply chain experts, and state policymakers to identify pathways for new Tribal Businesses.
- A facilitation of maritime businesses, port authorities, tribal fisheries, and social impact investors to co-design ocean stewardship workforce.
- Workshops with educational and training institutions such as College of the Redwoods and Cal Poly Humboldt to identify barriers for Opportunity Youth participation and possible policies and programs.
- Convenings among State Policymakers and regional researchers and study leads to scope implementation pathways for equity and environmental justice opportunities.
- Convene State, Tribal and Local entities with social and impact investors accelerate investment strategies, including Native and Regional CDFIs and other sources of funding.
- Conduct a series of consultations with regional entities providing wrap-around services necessary to enhance systems, safety, and training/educational infrastructure and identify barriers and resolutions.

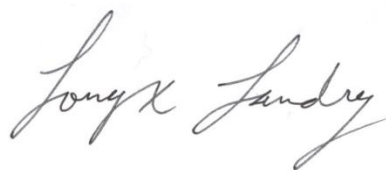
4. **Mandate the development of Community lead adaptive management strategies towards protecting the environment.** With Tribal Nations, Educational & Trade Certifying entities and regional Workforce Development entities ensure state and developer resources robustly contribute towards identifying, minimizing and mitigating environmental derogations associated with CEC related development.

Conclusion

We are grateful that the CEC is requesting robust feedback to complete the AB3 WFSC report requirements, as mandated by the California Legislature in AB525. We believe OSW Workforce and Supply Chain (WFSC) policies can help the State rebalance and reinvest in the Redwood Region while

simultaneously fulfilling renewable energy and economic goals. We trust our recommendations provide the CEC critical data and insights to complete the final report. We look forward to working with you in that process.

Respectfully,

A handwritten signature in black ink, reading "Lonyx Landry". The signature is written in a cursive, flowing style. The first name "Lonyx" is written with a large, stylized 'L' and 'y'. The last name "Landry" is written with a large, stylized 'L' and 'y'.

Lonyx Landry

Director – Inter-Tribal Student Services (ISS)