

DOCKETED	
Docket Number:	25-AB-03
Project Title:	Assembly Bill 3 California Offshore Wind Advancement Act
TN #:	265669
Document Title:	UC Berkeley Labor Center Green Economy Program Comments - Prioritizing Job Quality and Energy Transitions in Offshore Wind Reports
Description:	N/A
Filer:	System
Organization:	UC Berkeley Labor Center Green Economy Program
Submitter Role:	Public
Submission Date:	8/18/2025 4:32:09 PM
Docketed Date:	8/18/2025

*Comment Received From: UC Berkeley Labor Center Green Economy Program
Submitted On: 8/18/2025
Docket Number: 25-AB-03*

Prioritizing Job Quality and Energy Transitions in Offshore Wind Reports

Additional submitted attachment is included below.

Comments of the UC Berkeley Labor Center Green Economy team on the AB 3 Scoping Document related to Offshore Wind Seaports, Workforce, and Supply Chain Reports (Docket # 25-AB-03)

Dear Commissioners and Staff:

We appreciate the leadership of the California state legislature in passing Assembly Bill 3 (AB3) and the work of the California Energy Commission (CEC) staff to produce high-quality research through Report 1: Seaport Readiness and Report 2: In-State Assembly, Supply Chain, and Workforce Feasibility Study. We are grateful for the opportunity to comment on the Scoping Document for these reports and attend the informative staff workshop held on this topic. The development of an offshore wind industry that delivers clean energy to Californians, produces quality jobs and community benefits, and minimizes impact on the environment is critical to reaching the climate, economic and equity goals of the State of California.

We applaud the attention to workforce and equity issues in the existing scope for the AB 3 reports. Our comments highlight two related topics that we believe should also be included within the scope of the studies: job quality and energy transition regions. We offer the following recommendations for additions to the scope of the two reports: .

1. Incorporate job quality as a specific topic of interest for the scoping reports

In order to ensure the successful growth of the industry in CA and maximize its potential economic and equity benefits, the two scoping reports should incorporate job quality as a specific topic of interest within the following sections: Report 1: Workforce Opportunities, Equity and Environmental Justice; and Report 2: Workforce Development, Tribal Workforce Development Opportunities, Equity and Environmental Justice, and Economic Benefits and Impacts. This recommendation supports the following requirements from AB 3: 1-5, 1-7, 1-8, 2-2 to 2-13).

The reports should examine not just the potential *quantity* of jobs created, but also the potential *quality* of those jobs. Research on job quality should include information on wages, benefits, working conditions, career advancement, and opportunity for worker representation. Understanding existing job quality in the industry and potential challenges and opportunities for generating quality jobs is essential for developing job growth, job training, and equity strategies that can meet the needs of CA workers, communities, and the OSW industry.

Many of the jobs in OSW deployment and manufacturing are likely to be blue-collar jobs in construction, production, logistics, operations and maintenance. These jobs have the potential to offer good quality employment, livable wages, and long-term career pathways, but those outcomes aren't guaranteed. The scoping studies should assess potential job quality outcomes and recommend strategies for ensuring the best possible outcomes for workers.

Developing well-informed job quality strategies will facilitate successful industry growth in CA. Supporting job quality helps ensure adequate labor supply in the industry by generating

workers' interest and appetite for the work, and creating the kind of long-term career pathways that can reduce worker turnover and facilitate more effective training strategies and investments. Training and workforce development investments can have limited impact if there isn't a labor market that supports worker retention and rewards skill development. More effective training and worker retention also leads to better quality and consistency of work output — this is critical for the successful deployment of a cutting-edge, complex, and capital-intensive technology like offshore wind.

Job quality strategies will also help develop strategies that maximize the equity impacts of the growth of the OSW industry. Without job quality strategies, efforts to generate job opportunities for disadvantaged workers may result in these workers being placed in low-wage, dead-end jobs, or trained for a job that doesn't fully recognize and compensate workers for developing their skills. Job quality strategies paired with equity strategies can ensure that workers from targeted populations are offered the chance to start long-term careers in OSW, with good earnings potential and opportunities for advancement.

Understanding job quality impacts and developing job quality strategies will help CA understand the full scope of the potential economic impacts of the OSW industry, and develop deployment strategies that can ensure this industry grows in a way that brings maximum benefits to the state.

2. Explore strategies to prioritize new economic activity in regions affected by the energy transition

The potential economic benefits of an emerging OSW industry in CA offer an important opportunity to facilitate a just transition in CA by supporting workers and communities that may experience the negative economic impacts from the energy transition. The two scoping reports should include an assessment of potential strategies to prioritize siting new economic activity, quality job growth, and training investments in regions that have or are likely to experience significant job loss in fossil-fuel related industries. This involves the following sections: Report 1: Workforce Opportunities, Equity and Environmental Justice, and Report 2: Workforce Development, Tribal Workforce Development Opportunities, Equity and Environmental Justice, and Economic Benefits and Impacts. This recommendation supports the following requirements from AB 3: 1-5, 1-7, 1-8, 2-2 to 2-7, 2-9 to 2-13).

California has several regions that have had a longstanding economic reliance on fossil fuel industries, such as oil refineries. As the state continues to transition to clean energy, these regions are starting to see facility closures that cause significant economic disruption, including job loss and shortfalls in local tax revenue ([link](#)). Fossil fuel-dependent regions have an urgent need to cultivate new economic opportunities that can help them overcome these challenges, and the state should support these efforts to ensure that communities and workers in these regions aren't left behind in the energy transition.

Furthermore, fossil fuel transition regions may offer advantageous locations for OSW deployment and manufacturing activities in terms of their location, infrastructure, and workforce.

Many of CA's oil refineries are located near sea ports, in areas that may also be good deployment sites for OSW. Fossil fuel-dependent regions may also have industrial land and infrastructure that could be repurposed for OSW manufacturing and related activities. As the scoping reports explore siting questions for new port development and strategies to cultivate in-state manufacturing for OSW supply chains, they should examine the potential to locate new activities in fossil-fuel transition regions and explore strategies to prioritize activities and investments in these regions. These efforts should also incorporate strategies to ensure proper cleanup of decommissioned facilities and community input on siting and environmental justice concerns around any new activity.

In addition, fossil-fuel dependent regions also have an abundant supply of workers with extensive skills and experience in energy industries that are now or may soon be in need of new job opportunities ([link](#)). OSW deployment and manufacturing activities could make good use of these workers and their skills; as the scoping reports explore issues related to job growth, job quality, workforce training, and equitable job access, they should consider strategies to prioritize redeployment of displaced fossil fuel workers. This may include documentation of workers' existing skill sets and alignment with skills needed in OSW occupations, consultation with labor unions about transition strategies, and preferential hiring for displaced fossil fuel workers.

Research on workforce strategies should focus on connecting workers who live in neighborhoods near fossil fuel infrastructure (including refineries) to high quality job opportunities in the OSW industry. Many communities living near fossil fuel industries, including oil and gas refineries, have been impacted by disproportionate levels of local pollution from the fossil fuel industry which has significant negative impacts on health, well-being and economic stability. Focusing on workforce opportunities and access for communities impacted by current fossil fuel industrial activity can help the State achieve its goals around equity and environmental justice as well.

The emerging OSW industry offers an important opportunity to support a just energy transition in CA, and the regions affected by the energy transition have an important role to play in supporting the success of CA's emerging OSW industry. The scoping studies should further the state's understanding about what strategies are needed to help achieve these outcomes.

Thank you for the opportunity to comment on this scoping document and for the important work being done by the California Energy Commission on this critical issue. We look forward to staying engaged as the process develops.

Sincerely,

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