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## **BlueGreen Alliance Comments on CEC AB3 Scoping Document**

*Additional submitted attachment is included below.*



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

August 18, 2025

Chair David Hochschild  
California Energy Commission  
715 P Street  
Sacramento, CA 95814  
*Submitted Electronically*

Re: Staff Workshop on Assembly Bill 3: Scoping Reports on Offshore Wind Seaports, Workforce, and Supply Chain

Dear Chair Hochschild:

On behalf of the BlueGreen Alliance (BGA), our partners, and the millions of members and supporters they represent, we thank the California Energy Commission (CEC) for the opportunity to comment on the Scoping Reports on OSW Seaports, Workforce, and Supply Chain.

The mission of BGA is to unify labor unions and environmental organizations into a powerful force to fight climate change, protect the health of people and the environment, stand against economic and racial inequality, and create and maintain good-paying, union jobs in communities across the country. Offshore wind is a vital clean energy solution that presents a once-in-a-generation opportunity to advance this mission if projects are developed in an equitable and environmentally responsible manner, with high-road labor standards and attention to environmental justice. Offshore wind projects have the potential to lift up working people with family-sustaining union jobs, deliver benefits to communities hardest hit by climate change and economic inequality, and protect wildlife and critical habitats at every stage of development.

We appreciate the CEC beginning the AB3 study process by sharing these scoping reports with the public and offering a lengthy opportunity for the public to comment on these reports.<sup>i</sup> Sufficient comment opportunity is important for robust and inclusive stakeholder engagement, including labor unions, environmental organizations, Tribal Nations, historically underrepresented communities, low-wealth communities, communities of color, and impacted ocean users. We encourage the CEC to continue to facilitate the participation of impacted groups in future workshops and verbal and written public comment opportunities. We also encourage the CEC to ensure that all of the reports are couched in the goals and priorities of the Justice Access Equity Diversity Inclusion (JAEDI) Framework the CEC adopted.<sup>ii</sup>

In the following sections, we make several recommendations for preparing the AB3 reports. To summarize, we strongly urge the CEC to provide details related to creating high-quality union jobs with inclusive pathways for historically excluded communities; training and employment benefits; environmental justice; and environmental protection.

## Recommendations for Report 1: Offshore Wind Seaport Readiness Plan and Strategy

### *Environmental and Cultural Resources Considerations*

Offshore wind energy must be developed in an environmentally responsible manner that avoids, minimizes, and mitigates impacts to marine life and ocean users, meaningfully engages stakeholders from the start, and uses the best available science and data to ensure science-based and stakeholder-informed decision making. The CEC should analyze potential cumulative impacts; benefits of mitigation measures; and adaptive management strategies. The analysis should include all relevant data and acknowledge relevant scientific disagreements and data gaps. Avoiding sensitive habitat areas, requiring strong measures to protect wildlife throughout each state of the development process, and comprehensive monitoring of wildlife and habitat before, during, and after construction, are all essential for the responsible development of offshore wind port infrastructure. The combination of alternatives should be chosen that ensures communities, wildlife, cultural resources and the environment are protected while maximizing the creation of – and pathways to – quality, high-paying jobs, and economic benefits.

### *Port Development Costs and Funding Strategies*

BGA is supportive of the CEC examining funding and financing options for OSW development projects. We encourage the CEC to explore multiple avenues for funding sources including the consideration of state and federal financing. With the current lack of federal support and funding for OSW projects, robust state financing opportunities will be critical.

Additionally, we are pleased that the CEC will look at case studies of public funding of East Coast ports. We recommend that additionally the CEC review international OSW port financing case studies. With the CA lease holders having OSW experience in Europe, we may also glean good examples of funding opportunities from the developers as well.

### *Workforce Opportunities*

The CEC should review options from the base expectation that all projects should include local hire, Community Benefit Agreements (CBAs), card check neutrality agreements, joint labor agreements, and/or Project Labor Agreements (PLAs) to maximize benefits to CA and coastal OSW host communities. These practices help to ensure equitable access to jobs by including diversity, equity, and inclusion provisions.

### *Information Gaps in Report 1*

We appreciate the CEC acknowledgment of the need for port-specific information to identify the exact environmental impacts, cultural impacts, impact mitigation strategies, and workforce opportunities for each port. We recommend that while the CEC is researching this information with each port, they consult with the impacted communities including labor unions, environmental organizations, Tribal Nations, historically underrepresented or disadvantaged communities, low-

wealth communities, communities of color, all impacted communities, and impacted ocean users. Port-specific stakeholder groups will allow the CEC to collect data from the individuals who will be most affected by the development.

BGA agrees with the CEC's statement that AB525 will serve as a foundation and starting point to complete both AB 3 reports. AB525's Strategic Plan contains some of the details needed to answer key questions about each of the reports. We urge the CEC to utilize the findings of AB525 wisely to save time while still conducting comprehensive research to identify all the information gaps identified in the scoping document.

### *Missing Information from Report 1 Scoping Document*

Battery Energy Storage Systems (BESS) are commonly used to mitigate wind power fluctuation. While these are critical technologies to meet our clean energy goals, there is – as with all technologies - a possibility that such systems may pose threats to workers and first responders. Furthermore, it is important to ensure that there is sufficient emergency response capacity and emergency plans to address potential safety scenarios.

The state is working to address potential safety issues associated with battery systems. This includes recent action by the California Public Utilities Commission (CPUC) to set new safety standards and enhanced oversight of emergency plans for battery energy storage facilities.<sup>iii</sup> Additionally, SB 283 (Laird) currently moving through the legislature ensures local fire departments can consult and inspect battery storage facilities before they go online.<sup>iv</sup> The bill also mandates that these facilities adhere to the highest safety and hazard mitigation standards. We recommend that the CEC include a section summarizing state actions to date and best practices to address potential risks.

BESS needs to be built and maintained by a qualified, skilled and trained workforce. The same recommendations on labor standards and requirements highlighted in this letter for offshore wind projects must also apply to energy storage projects.

Additionally, the following is a list of example protective measures that could be implemented to mitigate health and safety hazards associated with BESS systems:

1. Introduce new air quality monitoring tools to accurately assess air quality and potential risks for surrounding communities
2. Ensure communities and fire departments have the necessary funding and experienced teams to handle BESS systems failures from arising projects without decreasing the level of service to the outside community
3. Treat lithium-ion battery fires and hazmat situations to bring in expertise and handle the hazard of damaged batteries
4. Ensure first-responders are sufficiently trained and wear protective gear

In sum, while BESS systems are necessary to support the shift to zero-emission electric technology, this infrastructure does not come without risks. It is vital the CEC consider the fire safety risks that come with BESS systems to the workers, first responders, and the outside community. We suggest including our recommendations to ensure the infrastructure is equitably designed in a way that protects cultural resources, public health, community well-being, and the biodiversity of coastal and marine ecosystems.

## **Recommendations for Report 2: In-State Assembly, Supply Chain, and Workforce Feasibility Study**

### *Economic Benefits and Impacts*

In the analysis of the potential economic benefits and impacts of achieving the state's manufacturing and assembly targets, the CEC should specify job categories as well as associated potential direct, indirect, and induced jobs; gross state product; and anticipated personal income anticipated from the development. As presented at the AB 3 Workshop, we support the forthcoming NREL study, which will assess the required offshore wind port jobs and associated certifications and education needed. In addition, we recommend the study includes an assessment of any needed additional training, average wages, hours, career advancement opportunities, physical demands, and safety information. This assessment should reinforce the need for labor standards, Project Labor Agreements and collective bargaining as ways for the projects to create and maintain high-road jobs long into the future, evaluate how employing skilled and trained workers can be a net cost-savings mechanism, and include information about the material quality, standards, and certifications needed to secure a supplier contract with an offshore wind developer in the region. This information is critical for U.S. companies to access opportunities, especially minority, women, and veteran owned businesses.

Additionally, there is currently a gap in data on how OSW projects in California will affect ratepayers. This is an area where BGA is interested in more information on the potential effects and financing options for California's OSW projects. BGA is excited to see the CEC's findings in this area of research, and we recommend that while the CEC investigates how California's OSW projects will affect ratepayers, they also research other potential areas for financing these projects.

### *Workforce Development*

We strongly recommend consulting with labor unions and labor-affiliated workforce development organizations on the workforce development investments needed to meet AB3's goals, as labor unions have extensive experience in this area.

The Workforce Feasibility report should focus on each of the four core areas of job creation potential for the OSW industry including manufacturing, construction, operations, and maintenance for OSW and its supply chain – and build off of well-established labor-led, industry

recognized training programs as well as labor standards that will establish a strong OSW industry, while also producing meaningful benefits to local communities.

Unions run high-quality, registered apprenticeship programs that train participants in necessary skills for the offshore wind industry. Developers must share information about the specific skills training and certifications required as well as information about employment opportunities. This information, along with specific commitments to developing durable pathways for underrepresented contractors and workers into training and employment is invaluable.

Union-affiliated training, labor-management training partnerships, registered apprenticeship, and union sponsored pre-apprenticeship programs, along with wrap-around services to support trainees through the programs (e.g., transportation and childcare resources), are the premier mechanisms for building high-road career pathways and help ensure that workers have a clear path towards skills advancement and career development. These programs promote equity and fairness in the workplace by providing training and career advancement to individuals from underrepresented groups and communities impacted by projects.

Pre-apprenticeship programs aim to ensure that workers can qualify for entry into an apprenticeship program and have the skills and support they need to succeed. These programs are generally designed to target certain populations or demographics such as low-income workers, workers of color, women, and other marginalized communities. Pre-apprenticeship programs have been well-established in the construction industry and are increasingly being deployed to manufacturing and other operations jobs as important tools to grow a diverse, well-trained workforce.

Union apprenticeship programs are registered through a state apprenticeship agency or through the DOL. Registered apprenticeships are paid positions that combine on-the-job training with classroom instruction in a trade. When these programs are paired with recruitment strategies, such as partnering with a community group to provide information about workforce and training opportunities and providing wrap-around services, the benefits can be even greater.

Additionally, many unions offer training throughout a member's career to enable them to stay up to date with changes in technology, safety protocols, maintenance practices and operational considerations. The most successful pre-apprenticeship and apprenticeship programs are those affiliated with registered apprenticeships or other contractually agreed on-the-job high-road training programs established through collective bargaining agreements. This includes high-quality, industrial union-provided training for manufacturing facilities that produce OSW supply-chain components as well as operations/maintenance for permanent OSW jobs.

We recommend that the CEC consults with labor unions and labor-affiliated workforce development organizations extensively to ensure California's specific labor dynamics and apprenticeship programs are understood fully while conducting the analysis necessary to meet the workforce development goals laid out for Report 2 in the scoping document.

### *Equity and Environmental Justice*

The CEC should analyze how port development and manufacturing infrastructure development can ensure that communities and Tribal Nations receive the maximum possible benefits. For example, Community Benefit Agreements (CBAs) are an important way to ensure that development projects provide real and meaningful community benefits. CBAs can be expansive in scope and are often negotiated with both union and community partners. When designed as legally-binding agreements, they provide a higher level of accountability and enforceability and can therefore help ensure that specific workforce and community benefits are provided. CBAs can ensure that developers are held accountable for providing the benefits they promise, and that community groups have a say in the development process. Local Hire provisions, often included in CBAs, are another important tool to support the hiring of workers from within the state or local community. Without this provision, work crews from out of state can be brought in, minimizing the job creation and economic impact benefits for the local community. The CEC should analyze the benefits of requests made by local communities, such as requests for CBAs or community governance of offshore wind projects.

The CEC should be sure to detail information related to air and water quality impacts in the region associated with potential manufacturing, port activities, construction, and ongoing operations and maintenance. When considering the environmental effects port development and manufacturing will have on local communities, the CEC should also consider the environmental impacts that will be negated due to cleaner manufacturing happening in California rather than importing manufactured goods across long distances. Pre-construction, construction, and post-construction monitoring should be conducted, especially in areas of known vulnerability such as those adjacent to known sources of contaminants or near environmental justice communities. The CEC should also analyze the extent of Tribal Nation consultation needed. In line with the lease stipulations, developers must ensure that all impacted Tribal Nations are properly consulted, including state-recognized Tribal Nations, local Tribal groups, and non-federally recognized Tribal Nations in a geographic analysis area that is representative of their historical presence in the region. Ensuring the consultation of Tribal Nations and ensuring the preservation of cultural resources is critical for advancing the environmental justice goals of the JAEDI Framework.

### *Technical Consultant Recommendations*

BGA supports the CEC's decision to engage a technical consultant in the analysis for Report 2. We recommend that the technical consultant should have an extensive background in labor standards, union apprenticeship programs, the California labor dynamic, and understand the global market of OSW. A familiarity with union apprenticeship and workforce development in California is necessary for this consultant as this will save them time when researching the report's information gaps. A consultant with knowledge of the specifics of California's labor unions will



allow for a deeper understanding of the information gaps and requirements for the supply chain feasibility report.

Additionally, if the CEC decides to hire a consultant for Report 1, it makes sense for the same consultant to work on both reports as this will lead to coordination between the two reports as well as alleviating the learning curve the consultant will have when familiarizing themselves with the OSW landscape in California.

### *Workshop Recommendations*

BGA is looking forward to engaging in and participating in the workshops the CEC will host for the AB3 reports. We are interested in learning more about the progress of the reports through the workshop topics identified in the scoping document. For all future workshops, BGA recommends comprehensive stakeholder engagement that includes publishing webinar dates and relevant reading materials a month before the webinar. This will allow stakeholders time to organize and ensure there is proper engagement at the webinars. Stakeholders cannot engage properly in the workshops or give their opinion on the workshop materials in the workshops themselves unless they have plenty of time to review materials prior to the workshop itself.

The CEC should also consider how to make workshops more accessible whether they are virtual, hybrid, or in-person. Specifically, if the CEC does host in-person workshops they should consider offering childcare, transportation, food, and other services. The CEC should investigate what are the feasible options that can make the workshops as accessible as possible given the budget they have. Some lower cost potential options could include hosting the workshops after working hours and holding the meetings near easily accessible public transportation. These are some of the best practices to ensure there is robust and equitable community stakeholder engagement.

Additionally, the CEC should engage with relevant stakeholders throughout the entire workshop process, during the planning, implementation, and follow-up. Stakeholders should be included during the development of the agenda, speaker list, and invite lists for all the workshops. The CEC should also engage stakeholders after the workshops to receive feedback and ensure there was adequate stakeholder engagement. Consultation with labor unions, environmental organizations, Tribal Nations, historically underrepresented or disadvantaged communities, low-wealth communities, communities of color, all impacted communities, and impacted ocean users is crucial to ensure there is good turn out and helpful public comments prepared for the workshops.

### *Missing Information from Report 2 Scoping Document*

When identifying the manufacturing capabilities for California, we recommend considering all types of facilities, such as those currently retired, facilities that can transition to OSW work, and the construction of new facilities. It would also be beneficial to know the cost breakdown for investments required for all the new facilities needed to reach the manufacturing goals.

Another area that is worth researching is the potential to standardize components across the OSW supply chain or set clear manufacturing standards. If developers can standardize components across the OSW supply chain, this will save money and time when building out California's supply chain. The CEC should also look at incentives and other solutions for standardizing components as this will provide economies of scale, and clarity on exactly what and how much needs to be done, which will then reduce the risk for manufacturers. Manufacturing standards set the requirements that component manufacturers must meet (e.g. Buy Clean, Buy Fair concepts).<sup>v</sup> The CEC should investigate both ideas and recommend a path that creates good union jobs, encourages innovation, and accelerates supply chain manufacturing in California.

The CEC should consider all potential supply chain options related to OSW when conducting the analysis for Report 2. There are a multitude of supply chain options related to the California OSW projects, including components of the wind farms themselves as well as port infrastructure development, transmission development, and more. All the areas related to OSW need analysis of the potential job opportunities and investments needed to meet the state's manufacturing goals.

#### *Market Strategy Gap in Report 2 Scoping Document*

There is a significant gap in the proposed framework regarding the OSW market structure policy. California possesses unique competitive advantages in innovation, a robust research and development (R&D) ecosystem, and a substantial market size, yet the current scoping document does not sufficiently articulate how the state intends to leverage these strengths to build a transformative offshore wind industry.

We therefore urge the CEC to expand the scope of its market structure analysis to include a comprehensive examination of how the state can strategically use its diverse powers to shape the growth of this nascent industry. How can the state capitalize on the competitive advantages of California innovation and its R&D ecosystem, coupled with California's substantial market size, to foster a robust in-state offshore wind manufacturing and supply chain? How can the state effectively implement a market structure that ensures high-road job creation, equitable economic development, and increased clean energy affordability? How can the state effectively use its various financial, regulatory, procurement, permitting, and enterprise powers to shape the growth of a nascent industry like offshore wind?

#### *Recommendations for both reports*

While Report 1 is due to the Legislature one year before Report 2 we recommend that the analysis for both reports take the findings of the other into consideration. There may be an overlap in identifying some of the port specific information identified in the information gaps for Report 1 and Report 2. For example, the information collected to identify which ports could create the most in-state workforce opportunities may also be relevant for identifying the manufacturing opportunities at each port as well. While Report 1 and Report 2 are different we recommend

identifying the areas of overlapping information and utilizing them to further the results of both reports.

## Conclusion

When done right, offshore wind power will create thousands of high-quality, union jobs in manufacturing, construction, and operations and maintenance while also avoiding, minimizing, and mitigating environmental impacts. Thank you for considering how the CEC might further strengthen its role in ensuring that offshore wind energy is developed responsibly, with attention to equity, maximizing quality jobs and career pathways, and protecting the environment by including our recommendations. We appreciate your effort to solicit stakeholder input to inform the public on the proposed plans for the AB3 reports.

Signed,

Jose Tengco  
Vice President, State Affairs Leadership  
BlueGreen Alliance

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<sup>i</sup> California Energy Commission, Assembly Bill 3 Scoping Document and Request for Comment, June 2025. [Staff Workshop on Assembly Bill 3: Scoping Reports on Offshore Wind Seaports, Workforce, and Supply Chain](#)

<sup>ii</sup> California Energy Commission (CEC), Justice Access Equity Diversity Inclusion Framework, February 2023. [https://www.energy.ca.gov/sites/default/files/2023-11/CEC-JAEDI-Framework\\_ada.pdf](https://www.energy.ca.gov/sites/default/files/2023-11/CEC-JAEDI-Framework_ada.pdf)

<sup>iii</sup> California Public Utilities Commission, CPUC Sets New Safety Standards and Enhances Oversight of Emergency Plans for Battery Energy Storage Facilities, March 2025. [CPUC Sets New Safety Standards and Enhances Oversight of Emergency Plans](#)

<sup>iv</sup> California Legislature, California Senate Bill 283, February 2025. [Bill Text: CA SB283 | 2025-2026 | Regular Session | Introduced | LegiScan](#)

<sup>v</sup> BlueGreen Alliance, Manufacturing and Industrial Policy Supply Chain Development, 2025. [BlueGreen Alliance | Supply Chain Development](#)