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EPIC AB 3 Seaport Readiness Comments December 17, 2025

Additional submitted attachment is included below.

December 17, 2025

California Energy Commission
Docket No. 25-AB-03
1516 Ninth Street
Sacramento, CA 95814

Via eComment: *25-AB-03 (Seaport Readiness Plan)*

Re: Require Quantitative & Enforceable Green Port Strategies As Part of the Offshore Wind Seaport Readiness Plan

Dear Commissioners:

The Environmental Protection Information Center (EPIC) submits the following comments on the draft Seaport Readiness Plan required under Assembly Bill 3 (2023) and codified in Public Resources Code § 25991.8. EPIC is a 501(c)3 nonprofit organization based in Arcata, California. EPIC has been defending the North Coast of California's ecosystems since 1977. EPIC supports responsible offshore wind development, but emphasizes that port development must be aligned with the state's climate, air quality, and environmental justice mandates. The Offshore Wind Seaport Readiness Plan should therefore require California ports accepting OSW port funding to adopt quantitative and enforceable green port strategies that effectively reduce air pollution and greenhouse gas emissions to the extent feasible.

I. <u>The Seaport Readiness Plan Should Consider Green Port Implementation Not As Optional, But As Fundamental To Project Readiness</u>

Pub. Res. Code § 25991.8(b)(8) requires the commission to consult with environmental and environmental justice organizations. Advocates from these organizations have repeatedly asked for this process to ensure that new port development does not contribute to air pollution in their communities. This issue goes beyond siting and deals more specifically with the equipment and technologies used at these facilities. A port should not be considered "feasible" or "ready" for large-scale offshore wind assembly if it remains largely dependent on dirty fossil-fuel machinery that would increase pollution burdens & contribute to climate change. Therefore, the seaport readiness plan ought to consider these issues explicitly.

The statutory language requiring identification of needed infrastructure investments (Pub. Res. Code § 25991.8(b)(6)) in particular can encompass consideration of technologies such as: shore power, zero-emission cargo handling equipment, microgrid and renewable energy

generation, and transmission enhancements to enable port electrification. These technologies have been identified in the PNNL Port Electrification Handbook as the most effective means of cutting port-related emissions.[1] They can also eliminate substantial amounts of NOx, SOx, and particulate matter pollutants that harm public health.[2] Offshore wind development should *improve* air quality, not inadvertently worsen pollution in fenceline communities. The PNNL Port Electrification Handbook also describes the potential cost savings of port electrification, making this requirement a smart fiscal move in addition to its health benefits. "While the initial investment can be significant, electric equipment is often more energy efficient, is less expensive to maintain, and can generate fuel cost savings that, in combination, can lead to significantly reduced operational costs over time."[3]

In addition, GHG emission limits at ports will likely continue to get more strict in the future as California makes progress towards its AB 1279 emission reduction goals of 85% below 1990 levels of GHG emissions.[4] It only makes sense for new port development to use the best available technologies available rather than be built and then have to retrofit in the future to meet stricter goals. Finally, given the fact that much of the funding for these projects is likely to come from State funds meant to combat climate pollution (Prop 4, GGRF, etc.) these ports should be required to operate using the best available technologies to reduce emissions. The Seaport Readiness Plan should therefore treat green port implementation not as optional, but as fundamental to project feasibility and readiness under Pub. Res. Code § 25991.8.

II. We Ask the CEC To Formalize & Implement A Requirement For Green Port Development in the Seaport Readiness Plan

CEC's Seaport Readiness Plan scoping document emphasizes that the plan must consider costs, infrastructure needs, and environmental factors in determining port readiness. This includes integrating recommendations from the AB 525 Strategic Plan where environmental and community impacts were expressly addressed. Additionally, the Commission's November 13–14, 2025 workshops on the draft plan included sessions on minimizing community impacts, environmental and equity considerations, and funding strategies for clean infrastructure.

These workshops demonstrate that environmental performance is already understood to be a necessary component of port readiness. EPIC urges the Commission to convert this recognition

[1] Idso, Shannon K., et al. *Port Electrification Handbook: A Reference to Aid U.S. Port Energy Transitions*. Pacific Northwest National Laboratory, 2024, PNNL-36016, www.pnnl.gov/publications/port-electrification-handbook-reference-aid-us-port-energy-transitions.
[2] Id at 4.
[3] Id at 5.
[4] Cal. Health & Safety Code § 38562.2 (West 2024).

into clear, measurable criteria and actions regarding green ports within the plan itself. Specifically, we recommend that State funding for offshore wind ports require those ports to develop quantifiable port emission reduction strategies. These should include a defensible analysis of strategies for reducing NOx, SOx, PM2.5, and CO_2 emissions at the outset of operations using best available emission reduction technologies. These strategies should also include projected annual expected reductions of these pollutants. Requests for state funding for OSW ports should be contingent upon a demonstration by the port of quantifiable steps that will be taken to use best available technologies to reduce emissions to the extent feasible. This includes demonstrating planning to ensure the port has access to adequate transmission infrastructure to support electrification of operations, in particular shore power for ships docking at the ports.

Pub. Res. Code § 25991.8(b)(10) requires the Offshore Wind Seaport Readiness Plan to "identify potential funding and financing strategies for necessary port development." Given the objective of reducing pollution related to port operations, the Seaport Readiness Should should in particular recommend leveraging federal Inflation Reduction Act port electrification grants such as the EPA Clean Ports Program, DOE Grants for port equipment electrification, and state clean transportation and grid-modernization funds. While some of these programs may be jeopardized by the current federal administration, this plan should consider the long time availability of such funds under future administrations. After all, the entire offshore wind industry depends on a change in federal administrations.

Thank you for your consideration of these comments. Please feel free to contact me with any questions.

Sincerely,

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