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Submitted On: 12/19/2025  
Docket Number: 25-AB-03*

**AB3 California Offshore Wind Advancement Act - Staff Workshops  
for Report 1 Scoping OSW Seaport Readiness**

Please find the attached comment letter in response to CEC Staff Workshops held November 13 and 14 to inform scoping for the Offshore Wind Seaport Readiness Plan.

We appreciate the work of CEC staff to inform communities about the Seaport Readiness Plan, and to receive input.

Thank you!

*Additional submitted attachment is included below.*

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

RE: Assembly Bill 3 California Offshore Wind Advancement Act - Staff Workshops for  
Report 1: Scoping the Offshore Wind Seaport Readiness Plan

*Submitted via Docket 25-AB-03*

Dear Chair Hochschild and Commissioners,

The Redwood Region Climate and Community Resilience Hub ("CORE Hub") appreciates the opportunity to comment on **Assembly Bill 3 Report 1: Offshore Wind Seaport Readiness Plan**.

The CORE Hub was established by regional leaders in climate resilience, mitigation, and adaptation. It is based at Humboldt Area and Wild Rivers Community Foundation, serving California Counties of Humboldt, Del Norte, and Trinity, as well as Curry County in Oregon. Our service area includes many Tribal Nations and Indigenous Communities, who have been stewards of the waters and lands here since time immemorial. Therefore, hosting offshore wind and related industrial developments in our Region requires remarkable care, consideration, and collaboration.

The CORE Hub, and many of our partners, submitted detailed technical analysis and recommendations to the July 18, 2025 scoping deadline. We offer these additional summary comments and requests in follow up to the November 13-14, 2025 staff workshops on the Seaport Readiness Plan, which reiterate a few key priorities and address a couple informational gaps in our longer comment document on communities and aquaculture.

**We request that the following be included and addressed in the Seaport Readiness Plan:**

- A. **Include information on and unique history of peninsula communities, Humboldt Bay/Wigi, and aquaculture in the Plan.** Provide guidance for community and aquaculture participation in development. Ensure concerns and interests of the Peninsula and aquaculture are addressed in the Plan and include guidance on best practices for site assessment and designing for minimal impacts and maximum protections for these important communities and businesses. Evaluate readiness not just for the building of the turbines but for long term co-existence with

adjacent neighbors and established coastal dependent industry.

- B. **Showcase frameworks for community decision making.** Communities need formal channels to impact decision making, and be seen as partners in decision making. Community advisory or steering committee structures for the lifetime of wind port projects can facilitate these leadership roles at many critical milestones along the way. It is critical that frontline communities have funding to participate over time.
- C. **Include robust recommendations for scientific research, cumulative impacts, and a programmatic approach.** In considering impacts, it is important to account for the cumulative impact of both the Wind Terminal and likely adjacent projects. We recommend applying a programmatic approach to assessing readiness that encompasses impacts and benefits of the Wind Terminal combined with adjacent connected projects. Consider what development might look like from a Bay/Wigi-centric focus. Address potential and cumulative impacts for local communities, cultural resources, the environment and migratory species. Set a standard for baseline data sets, acknowledge existing gaps, and offer recommendations for how to work with local partners to understand temporary, long term and cumulative impacts over time. Address potential impacts to related ecosystems, such as river systems of the soon to be undamed Eel River, the Elk River/Hikshari which empties into Wigi/Humboldt Bay, the Mad/Baduwat River immediately to the north, and recently undamed Klamath River further north. Encourage collaboration with existing scientific networks.
- D. **Include more robust site assessment practices with public transparency.** Encourage sharing information with the public about site assessment and selection processes and criteria, including what alternatives are available or have been considered, and the cultural, socio, economic, environmental, and sovereignty considerations that have been part of the analysis. Offer that best practice includes consideration of 2 or more potential locations with projections of opportunities and impacts at various scales of operations. Include predevelopment clean up and mitigation that will be required, as well as decommissioning clean up and mitigations that might be necessary.
- E. **Lift up potential for multi-benefit outcomes.** Describe regional ability to leverage sea port readiness to show the state that dollars invested here will produce viable outcomes - setting standards for the industry, putting people to work, generating renewable power for the state, and securing rural and tribal energy reliability.
- F. **Reinforce agency collaboration.** Emphasize the need for cross agency collaboration with examples of how to grow what is currently working. Include guidance on coordination of permitting processes.
- G. **Offer frameworks for agency and jurisdictional Tribal comanagement and costewardship agreements and partnerships.**
- H. **Highlight lessons learned from transformational regional projects with recommendations on how to evolve development.** Include lessons learned from de-industrialization and restoration efforts in the Redwood Region, specifically the undaming of the Klamath River.
- I. **Offer tools to deliver on protections and benefits.** Include guidance that best practices entail

incorporating a *range of tools* to deliver on protections and benefits, and to showcase examples such as impact fees, development agreements, Tribal benefit agreements, host agreements, community benefit agreements, Tribal co-management agreements, lease agreements, community benefit and engagement ordinances, etc. Include pathways for agencies to support community interests for protections and benefits - invite agencies to use tools and authorities they have (eg: funding, permitting oversight, indirect source rules, etc).

- J. **Recommend and signal the state's intent to prioritize zero emission equipment in offshore wind port development.** It is critical to frame zero emissions ports as part of California's pathway to reaching our net zero carbon pollution goals. In addition to reflecting community interests in zero emissions equipment for community, cultural, environmental and worker protections, include statements and analysis about the business case and long term cost effectiveness of zero emissions builds. This could include analysis of cost savings over time as well as ability for projects to leverage public and private funding through climate financing such as resilience bonds, Cap and Invest, and other mechanisms. The business case for zero emissions ports should include mechanisms to protect jobs and be careful to address worker and union concerns about automation.
- K. **Frame successful development as those that include indirect source rules (ISR) from the start.** The offshore wind industry is heavily dependent on marine transportation and will require significant increases in vessel traffic for ports associated with staging and integration and some manufacturing. To protect adjacent communities and help accelerate zero emissions technology development and deployment, we request that the Plan discuss the importance of indirect source rules being established as part of early project design, as well as roles state and local agencies can play in supporting and reinforcing an offshore wind ports ISR framework across the state.
- L. **Acknowledge and include recommendations for investing in and funding adjacent planning processes.** For example, this includes: county rezoning efforts that will need to be part of port development; ordinance development; economic and workforce development planning, coordination and implementation; etc.
- M. **Include guidance for state investments.** Building off the November 14, 2025 California Energy Commission Seaport Readiness panel on port funding and financing, it is important for the Plan to identify key elements the state will consider as criteria for port project grants. We request that weighted criteria include Tribal partnerships and comanagement, community steering committees, a commitment to community benefits agreements, zero emissions design, data transparency, a public health plan, siting collaboration with impacted communities and local existing industry, legally binding local hire commitments, strong environmental baseline data, a comprehensive framework to avoid, minimize, mitigate and monitor impacts, and an adaptive management approach. Additionally, we recommend that the state invest in multiple port projects and ensure that communities already experiencing over industrialization (eg. Long Beach) not be required to bear the brunt of developments necessary to facilitate offshore wind.

- N. **Link success of port development to timely advancement of other components of the sector.** For our region to realize energy reliability and achieve grid redundancy, it is important that CPUC keep the currently-set operational date for transmission infrastructure at 2034. This is a critical element of seaport readiness as it will impact disruptions to project operations if not addressed.
- O. **Come to the Redwood Region.** We ask that state agencies and leaders in charge of OSW development and related planning, permitting and funding please come to the region and meet with our partners and collaborators and the communities/networks/entities they represent as part of their process for developing the Seaport Readiness Plan.

### **Additional Information on Peninsula Community and Aquaculture - Background and Interests**

CORE Hub is deeply committed to working with local and state partners to ensure processes and development move forward with equity at the center, and for frontline communities and those most impacted by development to be included in design and decision making along the way. We offer the following information to lift up key elements of background information and interests of some of our local peninsula communities as well as aquaculture industry partners. CORE Hub does not speak on behalf of these groups, but we do want to reiterate information they have shared with us and members of the CEC staff, and request that the CEC team meet with these groups as part of the development of the Seaport Readiness Plan and as you move forward with designing future planning and programs.

### **Peninsula Background and Community Interests**

Peninsula communities are diverse in their experiences, and are connected as neighbors within and across various towns. There is a lot of pride in living on the Peninsula, which has worked hard to grow community and advocate for infrastructure investments. At the same time, the Peninsula faces significant infrastructure and service gaps that impact quality of life and equitable participation in regional development projects. Residents experience limited access to medical care, transportation, and reliable cell service. These challenges are compounded by geographic isolation and economic constraints, particularly in Samoa, where the majority of residents are renters in a dense, low-income community with minimal local amenities. While the Peninsula Community Collaborative, a Samoa resident organizing group, and the Humboldt Bay Harbor District have had many successes in bringing people together to learn about and inform the Heavy Lift Marine Terminal ("Wind Terminal") project, some residents remain unaware of the project, creating risks of conflict, mistrust and less than optimal design if decisions proceed without their input and leadership. Direct engagement with the CEC from the earliest stages is essential to ensure transparency and community-driven solutions. Residents seek strong protections embedded in project design and operations to safeguard environmental, social, and economic interests.

## Important Context of Samoa Communities

The town of Samoa is majority owned by the Danco Group and has two main communities - the Rex Townhomes development (opened in 2020) and the historic Old Town. Over the last 5 years, the population in Samoa has doubled and both communities have experienced substantial changes in housing options, infrastructure and demographics.

**The Rex Townhomes community** includes 80 income-qualifying affordable housing units that are home to approximately 180 children of single parent families and low income working families. Youth attend a small, underfunded school and have limited play areas. Many of those who are longer term residents of Rex believed that a bus stop would service their neighborhood, but that has yet to materialize and the community is challenged by a lack of reliable public transportation, and a very poorly maintained road to get into the community. The units have beautiful views of the Bay and ocean, and are also surrounded by existing and vacated logging industry activities.

Not all Rex community members are aware of the proposed Wind Terminal project, however some of those who are have shared that they are concerned about:

- Noise and vibrations from construction and operations (residents currently feel the vibrations of nearby industrial activity as the community is built on sand)
- Safety and security
- Handling of toxic waste removal
- Lack of access to necessary and promised resources once construction begins
- Loss of views and access to the Bay and land adjacent to the Rex development

**The historic Old Town Samoa community** is comprised of 90 houses and is home to 229 people, which includes nearly 22% youth under 18 years old, ~78% white, ~8% Latino, and ~60% renters. Residents appreciate proximity to nature and recreation access and a generally good quality of life. Regarding the proposed Wind Terminal project, they are most concerned about noise and would like there to be evening operating restrictions. Other concerns include light pollution, viewshed and disrupted access to the Bay.

## Aquaculture Background and Concerns

There is a long history and tradition of shellfish aquaculture on Humboldt Bay/Wigi. Today, the Bay hosts 8 shellfish companies who supply a large portion of California's oyster production. Additionally, one of the largest shellfish hatcheries on the West Coast operates on the Bay/Wigi which supplies seed to shellfish farmers throughout California, Washington, and Alaska. Oyster farming on Humboldt Bay is an important contributor to the economy and culture of the region and is a mutually beneficial industry to Bay ecology.

Oyster and seaweed farmers are concerned about the long-term health and viability of their industry

as the Humboldt Bay Harbor District moves forward with the proposed Wind Terminal project. Local farmers will be displaced and loose grounds. The intensity of the activities required to support offshore wind is likely to jeopardize the pristine water quality that currently exists. The project is expected to require a “constant flow of ship traffic into the Bay” (Holmlund, 11/14/25), which significantly increases the likelihood that biothreats make their way into what are currently disease-free waters. Turbidity and legacy/current pollutants will impact aquaculture due to the increase in frequency and scale of dredging required for the project, and antifouling paintings along with risks of oil and fuel spills will put the industry at great risk.

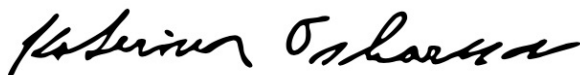
## Conclusion

We appreciate the Energy Commission’s thoughtful consideration of community requests, recommendations, context, and experiences as you develop the Offshore Wind Seaport Readiness Plan. Related projects will likely have unprecedented impacts on communities, for which the Plan can help guide measures that local and state agencies, in collaboration with developers, Tribal Nations, and communities, can work together to put in place through legally binding and enforceable agreements and policy that ensure benefits and protections.

Additionally, we applaud the CEC’s approval of \$18 million to the Humboldt Bay Harbor District for planning and community engagement for their proposed Heavy Lift Marine (“Wind”) Terminal project, and support the Commission’s Prop 4 investments in multiple sites. State funding, authority, and ongoing partnership are imperative for the Redwood Region if we are to realize an electrified, low emissions Wind Terminal project at Humboldt Bay that avoids and minimizes impacts for communities, has strong Tribal costewardship and comanagement agreements and practices in place, and allows for healthy sustainable colocation with with fishing and aquaculture.

Thank you for the opportunity to further inform scoping of the Offshore Wind Seaport Readiness Plan. The CORE Hub and our partners welcome and encourage further engagement with the CEC as you develop the Plan, and look forward to reading the draft in early 2026.

Sincerely,



Katerina Oskarsson, PhD

Executive in Residence

Redwood Region Climate and Community Resilience (CORE) Hub

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