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Comment on Prop 4 Emergency Regulations

Thank you for the opportunity to provide comments on emergency regulations that will guide the administration of Proposition 4 offshore wind port funding. The CORE Hub Community Benefit Network and THE Impact Project appreciate your consideration of the attached regulation recommendations.

Additional submitted attachment is included below.



March 11, 2026

California Energy Commission
Docket No. 26-POPD-01
715 P Street
Sacramento, CA 95814

RE: Emergency Regulations to Establish Proposition 4 Offshore Wind Ports Development Programs

Dear Chair Hochschild and Commissioners,

On behalf of the undersigned members and allies of the North Coast Offshore Wind Community Benefits Network (“Network”)¹ and T.H.E. Impact Project (“Trade, Health, Environment Impact Project” or “THE Impact Project”)² we respectfully submit the following comments on planned California Office of Administrative Law emergency regulations to establish Offshore Wind Ports Development Programs to administer voter supported funding as required under Proposition 4 - the Climate Bond.

¹ The North Coast Offshore Wind Community Benefits Network and related working groups is a diverse network of Tribal Nations, local government agencies and educational institutions, labor leaders, local community-based organizations, and community residents. The Network is convened by the Redwood Region Climate and Community Resilience Hub (CORE Hub), based at the Humboldt Area and Wild Rivers Community Foundation.

² Trade, Health, Environment (T.H.E.) Impact Project includes community-based organizations, environmental justice groups, academic institutions, and national environmental NGOs championing community-driven solutions that advance zero-emission freight operations and improve life expectancy in communities disproportionately impacted by pollution. T.H.E. Impact Project represents communities living near ports, highways, railyards, and warehouses that facilitate goods movement in Southern California and beyond.

The Network and THE Impact Project members and allies have come together to submit these comments based on aligned interests in working towards fossil fuel-free, just, and equitable energy systems that uplift thriving natural environments and communities today and for future generations. It is our position that offshore wind (“OSW”) development must help improve community health and wellbeing and economic opportunities across the state and must not concentrate or increase burdens—such as air pollution—in any community.

Proposition 4 provides the State of California with an unprecedented opportunity and mandate to reduce greenhouse gas emissions, build climate resilience, improve air quality, and deliver direct, measurable benefits to frontline communities.³ To meet these objectives, regulations must explicitly integrate community leadership, the principle of prevention, rigorous public health protections, strong baseline environmental assessments, and accountability structures that endure long after projects break ground.

Our recommendations draw upon local lived experience, community priorities, and emerging data concerning the significant operational and environmental impacts anticipated in and around the Port of Long Beach and Humboldt Bay. State, Port, and Harbor District documents indicate that offshore wind terminal development will bring significant new vessel and truck traffic, increase cargo-handling equipment operations, warehouse expansion projects, and industrial activity to both Humboldt Bay and Long Beach, with implications for emissions, noise, light pollution, safety, water quality, public health, and cumulative impacts in adjacent neighborhoods and affected regions, and for Tribal Nations.

To ensure that Proposition 4 funding advances the state’s climate, environmental justice, and public health goals, we urge the CEC to incorporate the following requirements into its regulatory framework:

- 1. Establish Accurate Air Quality Baselines, Require Thorough Evaluation of Emissions Increases and Public Health Impacts, and Ensure Long Term Independent Structures are In Place for Community Accountability**

Proposition 4 requires improving air quality, yet the offshore wind terminals construction and operations will worsen conditions for nearby residents unless stringent protections and mitigations are required, monitored, and enforced. Regulations are needed to make these protections non-negotiable. Projects funded under Proposition 4 must begin with site-specific baseline assessments of air quality, cumulative emissions, and existing

³ Strategic Growth Council. *Proposition 4 Emergency Implementation Regulations*. 4 December 2025. https://sgc.ca.gov/wp-content/uploads/SGC_20251210_Item6_AttachA_ADA.pdf - “Emergency regulations are required to immediately implement Proposition 4’s directives, in accordance with program and agency goals, to deliver funding that reduces greenhouse gas emissions, enhances climate resilience, improves air quality, and provides direct and measurable benefits to disadvantaged, severely disadvantaged, and vulnerable communities.” (p. 1)

health burdens. For Long Beach communities already experiencing extreme pollution levels and decades of non-attainment, existing emissions represent a *state of emergency*, and every increment of new emissions has magnified public health and ecosystem consequences. In Humboldt, air quality is expected to deteriorate based on a significant increase in marine vessel traffic. For communities in Samoa and the Phyllis Rex Townhomes immediately adjacent to the project, emissions exposure is particularly concerning.

To address these concerns, regulations should require:

- a. **Independent monitoring networks managed with community oversight.**
 - i. Ports should produce annual public reports on emissions, health outcomes, mitigation delivery, and community investments, with funding clawbacks for noncompliance.
 - ii. CEC should coordinate with California ports such as Port of Long Beach and the Humboldt Bay Harbor District to support and provide funding for health risk assessments, conducted in collaboration with the California Air Resources Board and local air districts, to analyze toxic emissions associated with port operations and terminal expansion projects. Funding should go to ports that have completed a public health risk assessment.
- b. **Pre-construction baseline monitoring** of air pollutants, including PM_{2.5}, NO_x, SO_x, diesel particulates, VOC, and greenhouse gases.
- c. **Assessment of construction- and operations-related emissions**, including from increased vessel traffic, heavy equipment, and transport activities. The increase in vessel movement associated with offshore wind assembly and towing operations is expected to be significant.⁴

Assessments and plans to specifically avoid and mitigate public health impacts, including:

- i. **Health impact assessments** tied to clear metrics and measurable outcomes.

⁴As stated by Harbor District Development Director Rob Holmlund in his presentation at the *Oregon State of the Coast Conference*, 14 November 2025; North Coast Offshore Wind. *Would the proposed Humboldt offshore wind project increase vessel traffic?* 23 September 2025. <https://www.northcoastoffshorewind.org/post/would-the-proposed-humboldt-offshore-wind-project-increase-vessel-traffic>; Port of Long Beach, Initial Study for the Pier Wind Terminal Development Project (Nov. 2023), at 2-51 (stating that “the placement and use of six barges in these main traffic areas could be a potentially significant impact to vessel traffic patterns...”).

1. Respiratory disease incidence and exacerbation.
 2. Cardiovascular impacts associated with air pollution.
 3. Additional health vulnerabilities in portside low-income communities.
 4. Environmental health impacts that will affect bay-dependent industries and businesses.
- ii. **Indoor air quality improvements** for homes adjacent to the site, including filtration upgrades, weatherization, and energy-efficiency installations that improve residents' health (e.g., ducting, HVAC).
 - iii. **Noise, acoustic and vibration mitigation** to protect mental and physical health.
- d. **Project-specific emission caps and real-time exceedance alerts that trigger automatic mitigation or operational curtailments.**
 - e. **Ongoing monitoring and public reporting**, available in real time, throughout construction and operations.
 - f. **Avoidance-first mitigation requirements**, ensuring that projects demonstrate clear plans for preventing harm before relying on mitigations.
 - g. **Require zero emissions operations for any port expansion projects or increased cargo volume associated with Pier Wind at the Port of Long Beach.**
 - h. **Prioritize ports that demonstrate a Harbor Commission-approved plan to ensure no-net-increase** in criteria pollutant exposure for adjacent neighborhoods.
2. **Guarantee Community Leadership and Decision-Making Power**

Proposition 4 investments will shape California's coastal regions for decades. This requires **binding structures** that guarantee community leadership and decision making power that will be sustained beyond the goodwill of current elected officials or agency staff.

We urge the CEC to set up this process in the following ways:

- a. Establish a **Community Accountability Body (CAB)** with decision-making authority in public and environmental health assessments, plans, monitoring structures, and adaptive management strategies. The CAB should have a formal relationship with but be convened independently of the Port of Long Beach,

Harbor District, developers, operators, or subcontractors.

- b. Require that **community representatives co-design monitoring frameworks**, mitigation plans, and public health benchmarks.
- c. Fund community **capacity-building and technical assistance** so residents can meaningfully participate in complex environmental and technical processes.
- d. Require **pre-construction community resilience measures** (such as a traffic safety plan and community infrastructure investments) and a timetable for implementation co-designed with immediately affected residents, particularly community members with low incomes, and codified in enforceable conditions of funding.

Communities closest to the wind terminal projects must have real power in shaping decisions that determine their safety and quality of life.

- In Humboldt, this includes the town of Samoa and income-eligible Phyllis Rex Townhome community where 80 families live in the industrial zone.
- Near-port communities including Long Beach, Carson, and Wilmington must also be consulted and their feedback meaningfully included during the Pier Wind project design and development process. In 2020, the life expectancy at birth for Black people in Long Beach was more than eight years lower than that of other measures racial/ethnic groups.⁵ Ensuring the equitable and responsible deployment of offshore wind is critical to reverse decades of environmental injustice exacerbated by rising port pollution. Advancing the shift to zero-emission freight operations is necessary to eliminate deadly freight pollution and ensure equitable access to clean air, water, and soil regardless of zip code.

Conclusion

California's clean energy transition must not replicate historical patterns of environmental harm experienced by our communities. With Proposition 4, the CEC has the opportunity to create regulations that prevent new burdens, promote equitable development, and guarantee meaningful community leadership.

We urge the Commission to adopt regulations that reflect the principles outlined in this letter and ensure that the benefits of climate investments reach those who have borne the brunt of pollution, disinvestment, and health inequities.

⁵ City of Long Beach Department of Health and Human Services, 2019 Community Health Assessment (2019), at 161, <https://www.longbeach.gov/health/healthy-living/community/community-health-assessment/>.

Thank you for your consideration and your commitment to building a clean and just future for all Californians.

Sincerely,

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