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RECA Comments on CEC POPD

Additional submitted attachment is included below.

Redwood Coast Energy Authority Comments on California Energy Commission Prop 4 Offshore Wind Ports Development Program (POPD)

1. How should POPD funding be allocated to ports?

a. Which activities and funding ranges are needed to advance port readiness?

- Funding should be directed toward core pre-construction activities necessary to advance Staging and Integration port development for floating offshore wind.
- Eligible uses should include pre-development work and site preparation.
- Pre-development activities include engineering, design, permitting, and environmental review.
- These are foundational investments required to de-risk projects, attract further investment, and ensure the port is shovel-ready for construction and for the next round of CEC POPD funding.
- Given the scale and integrated nature of these activities, the CEC should avoid distributing funding across multiple ports in a manner that dilutes impact.

b. How should CEC prioritize projects, as specified in the Climate Bond?

- As described in the AB 525 reports, the CEC should prioritize Staging & Integration ports with a CEQA notice of preparation (as of Feb. 29, 2024). In addition, the CEC should focus on funding projects located closest to existing offshore wind leases and likely future wind energy areas identified in the AB 525 reports. The staging and integration project located closest to existing lease areas and closest to potential future wind energy areas identified in the AB 525 reports in the Humboldt Bay Harbor, Recreation, and Conservation District's (Harbor District) project. The CEC should examine cost savings associated with the proximity of the Port of Humboldt to the lease area, which would translate directly to taxpayer and ratepayer savings by reducing the overall project costs to developers.
- CEC should consider alignment between port investments and other state policies / OSW infrastructure investments. Ports that can show alignment with state policy and infrastructure investment should be prioritized for Prop 4 funds.

c. How can this funding be used to leverage additional investments?

- Federal Investment The CEC should consider potential federal, state and private funding streams that may be more easily unlocked through award of the Prop 4 funds, including previously awarded funds that may be retrievable under a future federal administration. For example, PoH was previously awarded an INFRA grant for its OSW terminal under the previous administration. The CEC should consider whether previously awarded federal funds may be retrievable under a future federal administration if Prop 4 funds are also made available. Similarly, the CEC should consider whether there are state financing mechanisms that may be unlocked through award of Prop 4 funds, such as the state infrastructure bank, state loan guarantees, or other state backstop mechanisms.
- Private Investment In addition, the funding is crucial for making the project "shovel ready" for private investors. By helping to accomplish project design and permitting

milestones, the funding will derisk the projects and allow the Harbor District to attract investment from a wider range of potential investors. Rather than waiting for permitting and site preparation to occur during a more favorable federal administration, the CEC can invest in S&I ports like the Harbor District's project now so that they are ready to capitalize on renewed private investment interest during a future more favorable federal administration. Investing now will make the harbor district more competitive in the future, helping California stay on target for its offshore wind and 100% renewable clean energy goals. Therefore, CEC should prioritize investing the money sooner than later so that further delays do not cause the projects to fall further behind schedule.

d. Are there port activities or upgrades that complement offshore wind port development and are consistent with the Climate Bond?

- Capital dredging, studies to explore channel widening, port electrification including electric capacity upgrades, site preparation and remediation as part of project design

2. How can POPD bring benefits to California?

- Economic investment in rural California - POPD has the potential to reinvigorate rural California economies like those in Humboldt County. Humboldt County has seen waves of boom and bust investment for other resources in the past, including gold, timber, and cannabis. Offshore wind, and specifically a staging and integration port to assemble offshore wind turbines, has the potential to be an economic anchor for the region that is sustained into the long term. A just climate transition requires that California invest in all California communities and not leave behind the North Coast.
- The Harbor District's proposed offshore wind heavy lift marine terminal at Redwood Marine Terminal One is located at one such contaminated site. Under California environmental law, in order to redevelop the site, the District is required to remediate it. The district has been awarded a \$500,000 Brownfields Assessment Grant from the U.S. Environmental Protection Agency (EPA) which will pay for studies to determine the extent of contamination at the site. But thoroughly cleaning up the site will require additional funding that depends on permitting and constructing the project.

a. What specific information should applicants provide to demonstrate benefits are meaningful, measurable, and achievable?

- Applicants should provide a proposed project development timeline that explains when environmental permitting will be completed. Applicants should also have the opportunity to highlight co-benefits of their projects including site cleanup, opportunities for high road jobs, and investment in disadvantaged communities, etc.

b. How can POPD benefit Tribes, Disadvantaged Communities, Vulnerable Populations, and communities near ports?

- Investments that support cleanup of contaminated sites, investments that support port electrification, funding for capacity building to engage in environmental review and

permitting, jobs, fighting climate change, cleaning the air by supporting offshore wind development,

- Investing in the Harbor District's project meaningfully and directly benefits disadvantaged communities in Humboldt County. The Climate Bond Requires that "At least 40 percent of the total funds available pursuant to this division shall be allocated for projects that provide meaningful and direct benefits to vulnerable populations or disadvantaged communities. At least 10 percent of the total funds available pursuant to this division shall be allocated for projects that provide meaningful and direct benefits to severely disadvantaged communities." California Public Resources Code § 90140. According to CNRA's [map of disadvantaged and severely disadvantaged communities](#), the entire County of Humboldt qualifies. In particular, the Town of Samoa and several census tracts in Eureka qualify as severely disadvantaged communities.

- The Harbor District's project will provide direct and meaningful benefits to several disadvantaged communities on the North Coast by providing jobs, clean up of a polluting site, reducing greenhouse gas emissions, strengthening energy systems to be cleaner, more reliable, and resilient, and negotiated community benefits. The following kinds of benefits inherent to the Harbor District's project are specifically mentioned in the CNRA [Meaningful and Direct Benefit Guide](#) for Prop 4 projects although that list is not meant to be exhaustive.
 - Creating good local jobs with fair wages, benefits, and job training
 - Reducing greenhouse gas emissions to help slow climate change
 - Strengthening energy systems to be cleaner, more reliable, and resilient

- Optional benefits depending on Harbor District Project Design
 - Supporting tribal stewardship (which can include tribal access to lands, natural resources, and culturally important places; collaboration between tribes and other entities to share management and responsibilities of a given area or set of natural resources; and ancestral land return) (through mitigation)
 - Expanding education and awareness through partnerships with community groups, schools, nonprofits, and tribal organizations
 - Giving meaningful leadership roles to members or representatives of (S)DACs or vulnerable populations
 - Including components that consider how the project's proposed actions will affect the social, economic, and physical health and resilience of (S)DACs or vulnerable populations (Green Terminal Strategy)

- c. What types of engagement should ports conduct when planning for development?**
- Tribal consultation, community open-houses, community roundtables with key stakeholders and project consultants, mailers to potentially impacted community members

3. What could impact the success of POPD projects?

- Timely POPD funding is essential to maintain momentum with other State-led processes. CAISO has indicated it is closely watching North Coast port development activity for transmission planning purposes; a delay in POPD awards sends the opposite signal and can slow or suspend the transmission investment decisions that the offshore wind program ultimately requires.
- POPD projects will be successfully if they are right sized to the OSW industry need. Must be large enough to support OSW staging and integration but must also be feasible and financeable (i.e. not too big).
- Also, availability of clear revenue stream from OSW developers is key. This underscores proximity of port to OSW leases. Port that is closer to more leases will have a large pipeline of OSW leaseholder tenants, which provides more revenue certainty.
- Community acceptance and support will also impact success of these projects. Ports that can show community support are more likely to be successful in the long run.
- The State has already invested significant resources in parallel processes — including CAISO transmission planning, offtake framework design, and the AB 525 strategic planning work — that assume port readiness on a defined schedule. Delayed POPD funding decouples port development from these other investments and risks making ports the primary bottleneck for California's entire offshore wind program.
- Being unable to use the funds for site preparation/mitigation. We request the CEC clarify the eligible uses and consider mitigation as an eligible project activity.
- The success of the POPD grant depends on the State acting as a clear and committed partner, streamlining the path to award, eliminating avoidable administrative hurdles, and ensuring that funds are less restrictive (specifically regarding potential mitigation as an eligible project activity) so local communities can move projects forward without delay.
- The CEC should incorporate a need-based weighted scoring factor into the POPD solicitation. Smaller ports serving rural, disadvantaged, and tribal communities, and located closest to California's active offshore wind lease areas, should be credited for delivering strategic value with efficient, right-sized operations that match the current need of the industry and the state. Weighting for need ensures the program delivers on its Climate Bond equity mandate while directing investment where it is most strategically valuable. New investment in a rural area to make sure that this is successful and to make sure the state is a good steward of these funds to make sure they are successful.

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