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## **County of Humboldt POPD-01 Comments**

*Additional submitted attachment is included below.*



# COUNTY OF HUMBOLDT

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May 22, 2026

### California Energy Commission

Docket No. 26-POPD-01

715 P Street

Sacramento, CA 95814

Submitted via: [doCKET@energy.ca.gov](mailto:doCKET@energy.ca.gov) (Docket No. 26-POPD-01)

**Re:** Comments of the County of Humboldt on the Proposition 4 Offshore Wind Ports Development (POPD) Program – Docket No. 26-POPD-01

Dear California Energy Commission Staff:

The County of Humboldt respectfully submits these comments in response to the California Energy Commission's (CEC) introductory workshop for the Proposition 4 Offshore Wind Ports Development (POPD) Program (Docket No. 26-POPD-01). The County urges the CEC to prioritize funding in a manner that advances California's offshore wind goals, and to demonstrate that the Port of Humboldt Bay—specifically, the Humboldt Bay Harbor, Recreation, and Conservation District's (Harbor District) proposed heavy lift marine terminal at Redwood Marine Terminal One—represents the highest-value investment the CEC can make with the approximately \$183 million in available POPD funds.

These comments are informed by the Redwood Region Offshore Wind Roadmap (the Roadmap), a comprehensive supply chain, workforce, and community engagement analysis adopted by the Humboldt County Board of Supervisors and conducted by Xodus Group. The Roadmap, which was itself heavily informed by the CEC's AB 525 Final Report, provides an actionable, evidence-based framework for how the Redwood Region can capture meaningful economic benefit from offshore wind while serving as the backbone of California's floating offshore wind industry. The activities and investments described in the Roadmap align directly with POPD's eligible uses and underscore why the Harbor District's project must be the CEC's priority.

## I. How Should POPD Funding Be Allocated to Ports?

### A. Concentrate Funding at a Single Port Capable of Advancing the Offshore Wind Industry

The County strongly urges the CEC to concentrate the full POPD allocation at a single, eligible Staging and Integration (S&I) port with the demonstrated capacity to advance California's offshore wind program. Spreading funds across multiple sites risks producing facilities that individually fall short of developer requirements while exhausting available funding without delivering a single operational S&I port. California's offshore wind buildout cannot afford that outcome.

The Harbor District's project at Redwood Marine Terminal One is the only project in California that satisfies the Climate Bond's prioritization criteria and is positioned to serve as a complete, operational S&I port within the timeframe California's offshore wind program requires. The AB 525 Port Readiness Plan (Port Plan), prepared by Moffatt &

Nichol and adopted as part of the AB 525 Final Report, identifies the Port of Humboldt as one of only three California ports determined to be “the most appropriate locations for staging and integration sites”—and further singles out the Ports of Humboldt and Long Beach as the ports “actively working to become staging and integration sites to meet the most immediate needs of the offshore wind industry.” The County’s Redwood Region Offshore Wind Roadmap centers around this finding that the Harbor District is a prime location for S&I activities given the logistical constraints of transporting large floating offshore wind components by sea.

## **B. Eligible Activities and Funding Ranges Needed to Advance Port Readiness**

POPD funding should be directed toward the core pre-construction activities necessary to advance an S&I port from planning to shovel-ready status. The County Roadmap’s recommended actions provide a roadmap for the types of activities that are essential at this stage of development. The County recommends the following be treated as eligible and priority uses of POPD funds:

1. Pre-development work: engineering, design, permitting, and environmental review. These are foundational investments that de-risk projects, attract further private and federal investment, and ensure the port is shovel-ready for construction.
2. Site preparation and remediation: grading, soil stabilization, and cleanup of legacy contamination as part of the project’s site development scope.
3. Capital dredging and channel studies: the Harbor District’s terminal requires adequate vessel draft for WTIV-class vessels and large component barges.
4. Port electrification and electrical capacity upgrades: consistent with the Climate Bond’s clean infrastructure goals and the Harbor District’s Green Terminal Strategy.
5. Quayside infrastructure and heavy lift facilities: construction of wharf improvements, crane foundations, and load-bearing surfaces necessary for assembly and integration of floating offshore wind components.

The County requests the CEC explicitly clarify that site preparation and environmental mitigation are eligible project activities. Ambiguity on this point creates unnecessary risk for the Harbor District’s project schedule and may prevent timely use of awarded funds.

## **II. How Should the CEC Prioritize Projects?**

### **A. Follow the AB 525 Report’s Guidance: Prioritize the Harbor District’s Project**

As directed by the Climate Bond, the CEC must prioritize S&I ports that released a Notice of Preparation (NOP) under the California Environmental Quality Act (CEQA) on or before February 29, 2024, and projects that can demonstrate matching funds. The Harbor District’s project satisfies both criteria.

Beyond the statutory criteria, the CEC’s AB 525 Final Report identified the Port of Humboldt Bay as California’s most advanced and strategically positioned S&I port candidate. The Roadmap builds directly on those findings, confirming that the Port of Humboldt Bay is geographically closest to California’s active offshore wind lease areas—a material cost advantage for developers and, ultimately, for California ratepayers.

The County urges the CEC to incorporate a need-based weighted scoring factor into the POPD solicitation. Smaller ports serving rural, disadvantaged, and tribal

communities—located closest to California’s active lease areas—should receive credit for delivering strategic value through efficient, right-sized operations that match the current needs 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.

## **B. Proximity Matters: Ratepayer and Developer Savings**

The Roadmap underscores the economic significance of the Port of Humboldt Bay’s proximity to the Humboldt County lease areas: certain activities, particularly S&I, must be conducted close to project sites due to the size of major floating offshore wind components and the logistics of transporting them by sea. A port located farther from the lease area imposes additional transit costs on every project it serves. The CEC should examine the cost savings associated with the Harbor District’s proximity and recognize that those savings translate directly to lower ratepayer costs—a concrete and measurable benefit to California consumers.

## **III. How Can POPD Funding Leverage Additional Investment?**

### **A. Making the Project Shovel-Ready Unlocks Federal and Private Capital**

POPD funding is essential to making the Harbor District’s project shovel-ready for private and federal investors. By helping the Harbor District complete project design, environmental permitting, and site preparation milestones, POPD funding will de-risk the project and allow the Harbor District to attract investment from a wider range of potential partners.

The County notes that the Port of Humboldt was previously awarded a federal INFRA grant for its offshore wind terminal under the prior administration. The CEC should carefully consider whether previously awarded federal funds may be retrievable under a future federal administration if Prop 4 funds are also committed. Similarly, the CEC should evaluate whether state financing mechanisms—including the state infrastructure bank, state loan guarantees, or other state backstop mechanisms—can be unlocked through the award of POPD funds.

Investing now—rather than waiting for a more favorable federal environment—positions the Harbor District to capitalize quickly on renewed private investment interest and ensures California’s port infrastructure is not the bottleneck when the offshore wind program’s construction phase begins in the early 2030s. The Roadmap’s recommended actions reinforce this urgency: the window to establish first-mover advantage on the West Coast is now, and state investment is the catalyst needed to keep the Harbor District’s project on schedule.

### **B. Complementary Port Activities Consistent with the Climate Bond**

The County recommends the CEC confirm that the following port activities are eligible as complementary uses of POPD funds:

6. Capital dredging and studies to explore channel widening to accommodate WTIV-class and heavy component vessels.
7. Port electrification, including electric capacity upgrades consistent with the Green Terminal Strategy and the Climate Bond’s clean energy goals.
8. Site preparation and environmental remediation activities necessary to develop the terminal site, including cleanup of legacy dioxin contamination at Redwood Marine Terminal One.

## **IV. How Can POPD Bring Benefits to California?**

### **A. Economic Reinvestment in Rural California**

POPD investment in the Port of Humboldt Bay has the potential to reinvigorate a rural California economy that has experienced repeated cycles of boom and bust—gold, timber, commercial fishing, and cannabis. The Roadmap projects that offshore wind development could generate between 500 and 1,200 jobs in Humboldt County and the broader Redwood Region depending on project scale, with significant opportunities in building trades, maritime services, and STEM fields. A just climate transition requires that California invest in all of its communities and not leave the North Coast behind.

The Roadmap identifies specific near-term workforce development needs—including apprenticeship programs for construction trades such as welders, crane operators, and electricians—that POPD funding can help catalyze by creating a defined timeline for port construction activity. Investments that support a clear construction schedule are investments that allow training institutions, unions, and employers to plan. The Roadmap specifically calls for coordination between infrastructure development timelines and workforce training pipelines, and POPD funding is the trigger that makes that coordination possible.

### **B. Remediation of a Legacy Brownfield Site**

The Harbor District’s proposed terminal at Redwood Marine Terminal One is located on a brownfield site contaminated with dioxins—a legacy of pentachlorophenol (PCP) wood treatment operations that occurred at Humboldt Bay through the 1980s. Dioxins are persistent organic pollutants with documented human health impacts including cancer, birth defects, and neurological and immune system disorders; the EPA considers there to be no safe level of dioxin exposure. Humboldt Bay is currently listed as impaired under Clean Water Act Section 303(d) for dioxin contamination.

Under California environmental law, the Harbor District is required to remediate the site in order to redevelop it. A \$500,000 EPA Brownfields Assessment Grant will fund initial contamination studies, but full site cleanup depends on securing the resources that come with permitting and constructing the offshore wind terminal. POPD investment directly enables this remediation—protecting human health, restoring ecological function in an ecologically sensitive bay, and transforming a contaminated industrial site into a clean energy asset. This is precisely the kind of meaningful, direct, and measurable benefit that the Proposition 4 Climate Bond was designed to produce.

### **C. Benefits to Tribes, Disadvantaged Communities, and Vulnerable Populations**

The Harbor District represents the County of Humboldt, which is a designated Disadvantaged Community (DAC). The Harbor District’s project delivers multiple benefits specifically identified in the CNRA’s Meaningful and Direct Benefit Guide for Proposition 4 projects, including:

9. Creating good local jobs with fair wages, benefits, and job training opportunities for Humboldt County residents.
10. Reducing greenhouse gas emissions through the deployment of offshore wind generation.
11. Strengthening energy systems to be cleaner, more reliable, and more resilient on the North Coast.

12. Cleaning up a legacy contaminated site adjacent to a sensitive bay, improving environmental conditions for communities, fish, marine mammals, and birds.
13. Supporting tribal engagement through CEQA mitigation, community roundtables, and a tribal capacity draw-down fund to enable meaningful and consistent participation in environmental review.

The County recommends that POPD applicants be required to provide a proposed project development timeline that includes environmental permitting milestones, and that applicants have the opportunity to document co-benefits including site cleanup, high-road jobs, investment in DACs, and community engagement activities. The CEC's scoring criteria should give meaningful weight to these co-benefits.

## **V. What Could Impact the Success of POPD Projects?**

### **A. Timing Is Critical—Award Funds Without Delay**

Timely POPD funding is essential to maintaining momentum across California's offshore wind program. CAISO has indicated it is closely monitoring North Coast port development activity for transmission planning purposes. A delay in POPD awards sends the wrong signal—it can slow or suspend the transmission investment decisions that offshore wind ultimately requires, decoupling port development from the parallel state processes that assume port readiness on a defined schedule.

The Roadmap is explicit about the market signal value of continued state investment: with federal policy uncertainty elevated, the offshore wind industry is looking to state and local governments to determine where to continue investing. If the Redwood Region can demonstrate forward momentum through POPD funding, that is a strong signal to developers and major supply chain companies that the region is open for business. Conversely, delay compounds the risk that California's port infrastructure becomes the critical path item blocking the entire state program.

### **B. Right-Size the Project to Industry Need and Financial Feasibility**

POPD projects will succeed only if they are appropriately sized to the offshore wind industry's current and near-term needs. The Harbor District's project has been designed with this principle in mind—large enough to support genuine S&I operations for the Humboldt County and Morro Bay lease areas, but right-sized to be financeable and operationally realistic given the current stage of industry development. The Roadmap's workforce modeling—projecting between 500 and 1,200 workers depending on development scenario—confirms that the Harbor District's phased approach to port development is well-calibrated to actual market demand.

### **C. Revenue Certainty Requires Proximity to Lease Areas**

The long-term financial sustainability of an S&I port depends on a clear and stable revenue stream from offshore wind developers. The Roadmap confirms that the Port of Humboldt Bay's proximity to the highest concentration of active California lease areas provides the largest pipeline of potential developer tenants—and therefore the greatest revenue certainty. The CEC should treat developer proximity and pipeline depth as key success factors when evaluating POPD proposals.

### **D. The State Must Be a Clear and Committed Partner**

Rural and smaller ports like Humboldt cannot carry the weight of California's offshore wind ambitions alone. The County urges the CEC to act as a clear and committed

partner by: streamlining the path to award; eliminating avoidable administrative hurdles; clarifying that site preparation and mitigation are eligible project activities; and ensuring that funds are available on a timeline that keeps port development synchronized with CAISO's transmission planning, the state's offtake framework design, and the AB 525 strategic planning schedule. State leadership in the form of a timely POPD award is the single most important action California can take right now to advance its offshore wind program.

## **VI. Conclusion**

The County of Humboldt urges the CEC to use the approximately \$183 million in unawarded POPD funds to make a decisive, concentrated investment in the Harbor District's S&I port project at Redwood Marine Terminal One. This project is the only one in California that:

14. Satisfies the Climate Bond's statutory prioritization criteria (CEQA NOP filed on or before February 29, 2024; matching funds demonstrated);
15. Is located closest to California's active offshore wind lease areas, providing ratepayer savings and developer revenue certainty;
16. Is supported by a comprehensive Roadmap—aligned with the AB 525 Final Report—that provides an actionable, evidence-based path to a fully operational S&I port;
17. Delivers meaningful, measurable, and direct benefits to a designated Disadvantaged Community and to California's climate and clean energy goals; and
18. Serves as the foundation for a sustainable North Coast offshore wind supply chain and workforce development ecosystem with demonstrated community support.

We respectfully request that the CEC take the following specific actions as it develops the POPD solicitation:

19. Confirm that site preparation, environmental mitigation, capital dredging, and port electrification are eligible POPD uses;
20. Incorporate a need-based weighted scoring factor that credits rural, disadvantaged-community ports closest to active lease areas;
21. Require applicants to provide project development timelines with permitting milestones and to document co-benefits including site cleanup, jobs, and community engagement;
22. Release the POPD solicitation on the fastest possible schedule to avoid further decoupling of port development from CAISO's transmission planning and the state's offtake framework; and
23. Treat alignment with the Redwood Region Offshore Wind Roadmap and the AB 525 Final Report as positive scoring factors in the POPD solicitation.

Thank you for the opportunity to provide these comments. The County of Humboldt looks forward to continued engagement with the CEC as it develops the POPD solicitation and invests in California's offshore wind future.

Respectfully submitted,



Elishia Hayes  
Humboldt County Administrative Officer