

DOCKETED

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Filer:	Cody Freitas
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Building and Construction Trades Council of Humboldt and Del Norte Counties
1330 Bayshore Way, Suite 103, Eureka, CA. 95501 (707) 443-7328
www.BuildingTradesHDN.com

May 22, 2026

Chair David Hochschild
Vice Chair Siva Gunda
and
Commissioners

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

The Building and Construction Trades of Humboldt and Del Norte Counties are dedicated to advancing the careers of local Skilled and Trained workers and creating pathways for those embarking on their careers as trades workers. The use of California approved Apprenticeship programs and sustainable industry is paramount to our goal of having a healthy and secure middle class of trades workers in Humboldt and Del Norte Counties. California's commitment to, and investment in the construction of the two identified Staging and Integration Ports will shape the careers of hundreds of union workers during the construction and the Operations and Maintenance phases of a port development project and thousands of careers in secondary and tertiary fields supporting a new industry on the western seaboard.

With SB 100 and more recently, SB 1020, California has created not just the goal of 100% clean energy by 2045, but also a pathway towards that goal. AB 525 sets benchmarks for the Offshore Wind industry and identifies the role of Offshore Wind as a part of California's renewable energy portfolio. With current federal administration in opposition to the Offshore Wind industry, California needs to ensure that voter approved Prop 4 funds are allocated in the most efficient way to secure the greatest return on state investment in support of pioneering west coast offshore wind by facilitating the development and build out of the Port of Humboldt Bay and the Port of Long Beach.

We believe that the California Energy Commission needs to prioritize allocating the state's limited Prop 4 funds in a manner that has a realistic chance of raising up the Offshore Wind industry and therefore leading to the creation of long term and meaningful working class careers.



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Maintaining the State's multi-port strategy to meet the identified and ever-increasing energy demands in California is the only way for the Offshore Wind industry to achieve the goals identified in AB 525. With the rising demand for energy from the technology sector, regional generation and energy resilience through renewables will continue to be an ongoing deficit with a continually escalating cost of constructing new generation.

Authorizing the ports to spend grant money in a clearly identified scope that allows for the realistic and meaningful completion of critical path milestones. I.E. if both ports received 90 million, neither port would be able to complete construction of the sites, but the ports could complete mitigation projects, engineering, and permitting which would de-risk construction for future investors. Allowing this flexibility will also allow for the project developers to complete aspects of their project sooner instead of further escalating the overall price of the project as material and construction costs increase.

POPD has the opportunity to bring new career opportunities to these port sites. As a Labor organization we understand that projects do not start as an idea on Monday and you get to break ground on Thursday. Pioneering a new industry in federal waters off the coast of California will not happen tomorrow, but we have the opportunity to attack this issue strategically and plan for the creation of a new sustainable industry and career long jobs for Union workers. Both the Humboldt Heavy Lift Marine Terminal and Pier Wind are projects that will be built under Project Labor Agreements that support and enforce local hiring, Apprenticeships, training and supporting disadvantaged communities. Humboldt Bay's Project Labor Agreement supports the ongoing efforts of our Building Trades Council and Cal Poly Humboldt's partnership in hosting the North America Building Trades Unions' MC3 (Multi-Craft Core Curriculum) apprenticeship readiness programs to train and upskill residents, primarily focused on Women in the Trades and Tribal members. This program already has a stronger than average national placement rate and will continue to help cohort participants succeed in California approved Apprenticeship programs and be placed into union careers near their homes during port development.

We believe that the CEC should consider the above points in this scoping process as well as the messaging the CEC is sending to the Offshore Wind industry if ports other than identified Staging and Integration ports are allowed to apply for these funds.

Each member of our council has a career worth of working in the field on construction projects and reviewing project documents pre and post funding. If sufficient funding is not provided to a single project to allow for the completion of Critical Path milestones, all



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projects will be subjected to lethargy and changing political tides. However, if the CEC can grant money to a project in an amount that will have a realizable and meaningful impact on the total cost of the build out, that will have a large impact on derisking the project for future funding from private investors, State or a future federal government.

Thank you for the opportunity to allow us to provide input into the California Energy Commission scoping of the allocation of Prop 4 funds. We look forward to continuing to work with the CEC and the Humboldt Bay Harbor, Recreation, & Conservation District do our part to attain California's Renewable Energy goals and to make sure that generate not just green energy, but a robust and local pathway to middle class union trades workers along the way.

Sincerely,

Cody Freitas
Secretary Treasurer
Building and Construction Trades Council of Humboldt and Del Norte Counties
(707) 601-4711
cfreitas@oe3.org