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| Docket Number: | 26-POPD-01 |
| Project Title: | Prop 4 Offshore Wind Ports Development Program |
| TN #: | 270210 |
| Document Title: | POPD Comments (Updated) |
| Description: | N/A |
| Filer: | System |
| Organization: | CORE Hub Network & THE Impact Project |
| Submitter Role: | Public |
| Submission Date: | 5/22/2026 9:08:57 PM |
| Docketed Date: | 5/26/2026 |

*Comment Received From: CORE Hub Network & THE Impact Project
Submitted On: 5/22/2026
Docket Number: 26-POPD-01*

**CORE Hub Network & THE Impact Project Prop 4 POPD Comments
(Updated)**

Additional submitted attachment is included below.



May 22, 2026

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

RE: Request to Center Public Health, Frontline Communities, Indigenous Peoples, and Tribal Nation Leadership in Advancing Zero-Emission Goals for Proposition 4 Offshore Wind Port Development Program

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 Trade, Health, and Environment (“THE”) Impact Project,² we respectfully submit the following comments on the California Energy Commission’s Proposition 4 Offshore Wind Port Development Program (“POPD”).

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

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 THE 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. THE Impact Project represents communities living near ports, highways, railyards, and warehouses that facilitate goods movement in Southern California and beyond.

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.

I. INTRODUCTION

Proposition 4 (“Prop 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, Prop 4 program eligibility criteria, requirements, and review must incentivize applicants to explicitly integrate community leadership, the principle of prevention, rigorous public health protections, strong baseline environmental assessments, and accountability structures that endure long after project decommissioning. In addition, environmental and public health protections are under threat due to the forthcoming Building an Affordable California Act (“BACA”) ballot initiative,⁴ making it more important for the CEC to integrate strong protections in the Prop 4 solicitation and regulatory requirements to center public health, frontline communities, Indigenous Peoples, Tribal Nations, and ecosystem safeguards.

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. Our recommendations are summarized here:

1. Determine how much POPD funding per grant cycle is needed to ensure compliance with the Senate Bill 867 (“SB 867”) requirement to dedicate at least 40% of climate bond funds to achieve meaningful benefits to disadvantaged, severely disadvantaged, and vulnerable populations.
2. Identify and apply criteria developed with affected communities to assess whether a benefit is “meaningful” and integrate such criteria into the primary scoring process.
3. Condition Prop 4 funding on robust (i) environmental and public health baseline assessments, (ii) ongoing evaluation of emissions throughout construction, operation, and maintenance of ports, and (iii) proper mitigation strategies to avoid emission increases.
4. Guarantee long-term community leadership and decision-making power.

II. DISCUSSION

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, include warehouse expansion projects, and expand industrial activity to both Humboldt Bay and Long Beach.⁵ These activities have implications for emissions, noise, light pollution, safety,

³ California Natural Resources Agency, *Prop 4 Climate Bond*, https://bondaccountability.resources.ca.gov/Propositions/Proposition_4_Climate_Bond

⁴ <https://advocacy.calchamber.com/ceqa/> + <https://buildaffordableca.com/>

⁵ Port of Long Beach, “Initial Study for the Pier Wind Terminal Development Project,” (Nov. 2023), p. 2–16, <https://ceqanet.lci.ca.gov/2023110696> (as of May 21, 2026); California Energy Commission, Final AB 525

water quality, public health, and cumulative impacts that will affect adjacent communities, neighboring regions, and Tribal Nations.

To ensure that Prop 4 funding advances the state’s climate, environmental justice, and public health goals, we urge the CEC to incorporate the following requirements into its POPD regulatory and solicitation framework for program design, eligibility, requirements, review, and reporting.

1. *Determine how much POPD funding per grant cycle is needed to ensure compliance with the SB 867 requirement to dedicate at least 40% of climate bond funds to achieve meaningful benefits to disadvantaged, severely disadvantaged, and vulnerable populations.*

SB 867 states that the CEC must allocate at least 40% percent of total funds available for projects that provide meaningful and direct benefits to vulnerable populations or disadvantaged communities and at least 10% of the total funds available shall be allocated for projects that provide meaningful and direct benefits to severely disadvantaged communities.⁶ Meaningful and direct benefits must be durable and directly responsive to community priorities as portside residents and surrounding communities are best positioned to define benefits that are truly community-serving.

Currently, of the \$44 million dollars awarded to the first five projects, none report providing direct benefits to disadvantaged communities, severely disadvantaged communities, or vulnerable populations.⁷ Therefore, to ensure the SB 867 thresholds are met, we urge the CEC to set explicit targets for each grant cycle to require that at least 50% of projects provide meaningful and direct benefits to disadvantaged and severely disadvantaged communities.

2. *Identify and apply criteria co-created with affected communities to assess whether a benefit is “meaningful” and integrate such criteria into the primary scoring process.*

SB 867 references “meaningful” benefits multiple times without defining the term or providing guidance for how the CEC should assess proposed benefits. We therefore urge the CEC to develop and adopt clear criteria in partnership with affected communities that identify “meaningful” benefits. These criteria should also be applied consistently across all projects and cycles. Doing so will both strengthen the Commission's ability to evaluate benefit provisions and generate concrete data to verify compliance with SB 867 requirements. To further ensure “meaningful” benefits, community benefits should be weighted within the primary proposal scoring criteria rather than treated as bonus points.

Report, p. 157, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=257700&DocumentContentId=93596> (as of May 22, 2027).

⁶ SB-867 Safe Drinking Water, Wildfire Prevention, Drought Preparedness, and Clean Air Bond Act of 2024. (2023-2024) https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240SB867 Sec. 90140.

⁷ California Natural Resources Agency, Bond Accountability Program: Development of Port Facilities and Infrastructure for Offshore Wind Generation, accessed May 18, 2026, <https://bondaccountability.resources.ca.gov/Program/ProgramDetailProp4?id=1105&PropositionPK=1049>.

3. *Condition Prop 4 funding on robust (i) environmental and public health baseline assessments, (ii) ongoing evaluation of emissions throughout construction, operation, and maintenance of ports, and (iii) proper mitigation strategies to avoid emission increases.*

Prop 4 requires improving air quality, yet proposed offshore wind terminal construction and operations will worsen conditions for nearby residents unless stringent protections and mitigations are required, monitored, and enforced. Specific criteria are needed to make these protections non-negotiable.

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 from surging cargo volume has magnified public health and ecosystem harm. 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, as are impacts from noise, light, vibrations, sound, and potential safety risks.

While a number of these recommendations fall under the California Environmental Quality Act and other regulatory oversight processes, the threat of BACA could undermine the ability of the public and agencies to require and receive such data. As such, we recommend the following actions to safeguard the environment and public health regardless of whether BACA passes in November:

- a. Require robust pre-construction baseline analysis, ongoing environmental and public health assessments, and mitigation plans.

If BACA passes, it cannot be assumed that these assessments or mitigation plans will be required. Therefore, projects funded under Prop 4 must begin with site-specific baseline assessments of air quality, cumulative emissions, and existing health burdens as well as effective and comprehensive mitigation plans. Once these are completed, all projects should also conduct ongoing assessments to understand the implication of development activities and adjust mitigation plans as appropriate. Specifically, we recommend the following activities be required as a condition of receiving Prop 4 funding:

Pre-construction Assessments

- Air pollutants, including (i) PM_{2.5}, (ii) NO_x, (iii) SO_x, (iv) diesel particulates, (v) VOC, and (vi) greenhouse gases.
- Health impacts, including (i) respiratory disease incidence and exacerbation, (ii) cardiovascular impacts associated with air pollution, (iii) additional health vulnerabilities in portside low-income communities, (iv) environmental health impacts that will affect bay-dependent industries and businesses.

Ongoing Assessments

- Ongoing construction and operations/maintenance-related emissions, including from increased vessel traffic, heavy equipment, and transport activities, which is expected to be significant.⁸

Protection & Mitigation Activities

- Avoidance-first mitigation requirements, ensuring that projects demonstrate clear plans for preventing harm before relying on mitigations.
 - Project specific emission caps and real time exceedance alerts that trigger automatic mitigation or operational curtailments.
 - Noise, acoustic, light, and vibration mitigation to protect mental and physical health.
 - 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).
- b. Ensure public health accountability and emissions data transparency through public health impact monitoring and reporting.

Ongoing public health impact monitoring and public reporting, available in real time, throughout construction and operations is critical for state agencies and the public to assess impacts of port development projects. To ensure sufficient data sharing, ports should produce annual public reports on emissions, health outcomes, mitigation delivery, preventive measures related to sex trafficking and Missing and Murdered Indigenous Peoples, and community investments. The CEC should also establish clawback provisions for noncompliance.

- c. Require ports to conduct health risk assessments as a condition of receiving Prop 4 funding.

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 and other significant public health impacts associated with port operations and terminal expansion projects. Funding should go to ports that have completed a public health risk assessment.

- d. Require zero-emission operations and prioritize funding ports that demonstrate zero-emission commitments.

Reducing, or ideally eliminating, pollution from port operations equipment is critical to improving public health and protecting the environment. The Prop 4 program and

⁸ The increase in vessel movement associated with offshore wind assembly and towing operations is expected to be significant, as 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...”).

solicitation design should require zero-emission operations for any port expansion project or increased cargo volume associated with Pier Wind at the Port of Long Beach. In addition, the CEC should prioritize funding ports that demonstrate a Harbor Commission-approved plan to ensure no-net-increase in criteria pollutant exposure for adjacent neighborhoods.

4. *Guarantee Long-Term Community Leadership and Decision-Making Power.*

Prop 4 investments will shape California's coastal regions for decades. This requires establishing binding oversight and accountability structures that guarantee community leadership and decision-making power that will be sustained beyond the goodwill of current elected officials or agency staff. To accomplish this, we urge the CEC to set up this process in the following ways:

a. Establish a Community Accountability Body ("CAB").

This body would have 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 co-designed oversight processes with port communities.

Port communities have rich expertise and understanding of the land, the communities, and surrounding areas. Their expertise is vital to the success of protecting the environment and public health and therefore should be integral as community representatives to co-design monitoring frameworks, mitigation plans, public health benchmarks, and consequences for non-compliance.

c. Fund community capacity-building and technical assistance.

Participating in time-intensive regulatory or public processes is difficult for some Tribal Nations, community members, small public interest non-profits, or the like. However, by ensuring funding for community-based organizations to educate, participate, and advocate on behalf of their residents, communities can meaningfully participate in complex environmental and technical processes.

d. Require pre-construction community resilience measures.

Promises of community benefits are often made but not fulfilled. To ensure benefits are realized, communities should be involved in the design of measures to improve the areas surrounding ports. The CEC should therefore require that resiliency measures are completed prior to the onset of construction or no later than 12 months after construction activities begin. The design of measures could include, but are not limited to, items such as a traffic safety plan, community infrastructure investment plans, as well as a timetable for implementation. These items must be co-designed with immediately affected residents, including low-income communities and communities of color, and codified in enforceable conditions of funding.

e. Support community-based participatory research.

This is an innovative model that ensures research studies are designed in partnership with community members. The activities are supported by researchers and are plans to gather data about pollution sources and their proximity to sensitive receptors.

It is vital that communities closest to the wind terminal projects have real power in shaping decisions that impact their safety and quality of life. For the Port of Humboldt, this includes the town of Samoa and income-eligible Phyllis Rex Townhome community where 80 families live in the industrial zone.

For the Port of Long Beach, 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.⁹ 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.

III. CONCLUSION

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

We urge the Commission to design a POPD program and solicitation that reflects 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. Thank you for your consideration and your commitment to building a clean and just world for current and future generations.

Sincerely,

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⁹ 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/>.

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