

<b>DOCKETED</b>	
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# Manila Community Services District

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May 19th, 2026

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

## RE: Comments on Proposition 4 Offshore Wind Ports Development Program (POPD)

Dear Commissioners:

The Manila Community Services District appreciates the opportunity to comment on the California Energy Commission's Proposition 4 Offshore Wind Ports Development Program (POPD). As a Community Services District serving the community of Manila since 1965, Manila CSD provides waste, wastewater, parks and recreation services to residents on the Samoa Peninsula on the western shores of Humboldt Bay.

Manila CSD supports strategic, targeted investment in offshore wind port infrastructure as a cornerstone of California's transition to a clean energy economy. Based on our regional experience and the unique readiness of the North Coast, we offer the following recommendations to maximize the effectiveness, equity, and long-term success of POPD funding.

### Strategic Allocation of POPD Funding

We recommend that the Commission **concentrate POPD funding on a single, high-readiness staging and integration port**, rather than distributing limited resources across multiple locations. Offshore wind port development is capital-intensive and highly integrated; spreading funds across multiple sites risks producing underdeveloped facilities that fail to meet industry requirements.

### Project Prioritization Criteria

The Commission should prioritize projects that demonstrate proximity to existing offshore wind lease areas and future wind energy zones, demonstrated environmental review progress (including a CEQA Notice of Preparation), alignment with state offshore wind strategy (AB 525), and integration with related infrastructure planning, including transmission.

The proposed project at Humboldt Bay is uniquely positioned in this regard. Its proximity to lease areas offers direct cost savings to developers and ratepayers while improving operational feasibility. This alignment ensures POPD investments complement broader state efforts rather than creating bottlenecks.

### **Leveraging Additional Investment**

POPD funding should be used to catalyze additional investment.

Previously awarded federal grants, such as U.S. DOT INFRA funding, may be reactivated or strengthened through state investment. State financing tools, including infrastructure banks, loan guarantees, and credit enhancements, can be leveraged as projects reach sufficient readiness.

### **Economic and Environmental Benefits**

POPD presents a significant opportunity for rural economic development. In Humboldt County, offshore wind has the potential to become a long-term economic anchor following cycles of boom and bust in industries such as timber and cannabis. Key benefits include the creation of high-quality local jobs, long-term economic diversification, and advancement of California's clean energy goals. POPD funding will also support the cleanup of legacy industrial contamination, including sites impacted by pentachlorophenol and dioxins. Redevelopment of these sites will improve environmental health, restore sensitive ecosystems, and enable safe and productive reuse of industrial lands.

### **Advancing Equity and Community Benefits**

Humboldt County qualifies entirely as a disadvantaged community under state criteria, with several areas identified as severely disadvantaged. Investment in the North Coast directly supports the Climate Bond's mandate to deliver benefits to underserved populations. Projects should demonstrate job creation with fair wages and training pathways, greenhouse gas reduction and climate resilience, meaningful community engagement, and partnerships with Tribal governments and local organizations.

### **Conclusion**

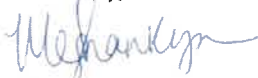
California's offshore wind goals depend on timely, strategic investment in port infrastructure. Humboldt Bay is uniquely positioned to deliver on those goals. Its proximity to existing lease areas, advanced project readiness, and alignment with state planning efforts make it the most efficient and cost-effective location for a fully operational staging and integration port.

At the same time, investment in Humboldt Bay directly fulfills the Climate Bond's commitment to disadvantaged communities. Humboldt County qualifies entirely as a disadvantaged community, with several areas identified as severely disadvantaged. Funding this project will deliver measurable and lasting benefits, including high-quality local jobs, environmental remediation of contaminated industrial sites, and long-term economic stability in a rural region that has experienced repeated economic disruption.

Concentrating POPD funding in Humboldt Bay ensures the State achieves both its clean energy objectives and its equity mandate. A focused investment will accelerate project readiness, unlock additional public and private capital, and position California to compete effectively in the offshore wind industry.

Manila CSD urges the Commission to prioritize a single, high-readiness staging and integration port in Humboldt Bay and to ensure funding can be used for critical pre-development and site preparation activities, including remediation. This approach will deliver the greatest return on public investment while advancing economic opportunity, environmental restoration, and energy resilience for California.

Sincerely,



Meghan Ryan

President of the Board of Directors