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*Comment Received From: Redwood Region Climate and Community Resilience Hub  
Submitted On: 7/11/2022  
Docket Number: 17-MISC-01*

## **Comment on AB 525 Offshore Wind Planning Goals**

The Redwood Coast Climate and Community Resilience Hub (â€œCORE Hubâ€) appreciates the opportunity to comment on the Draft Commission Report on Offshore Wind Energy Development off the California Coast and gigawatt goals discussed in the recent AB 525 workshop held June 27, 2022. Thank you for considering the full content of the attached letter.

*Additional submitted attachment is included below.*

July 11, 2022

California Energy Commission  
Docket No. 17-MISC-01  
Docket Office  
1516 Ninth Street  
Sacramento, CA 95814

**Re: Comment on AB 525 Offshore Wind Planning Goals**

Dear Chair Hochschild and Esteemed Commissioners:

The Redwood Coast Climate and Community Resilience Hub (“CORE Hub”) appreciates the opportunity to comment on the Draft Commission Report on Offshore Wind Energy Development off the California Coast and gigawatt goals discussed in the recent AB 525 workshop held June 27, 2022.

The CORE Hub was established by regional leaders in climate resilience, mitigation, and adaptation and is based at Humboldt Area and Wild Rivers Community Foundation, serving California Counties of Humboldt, Del Norte, and Trinity, as well as Curry County in Oregon. Our service area includes 27 Tribal Nations and Indigenous Territories. The CORE Hub’s goal is to become the first proven carbon sequestering rural and Tribal region in the United States. We act toward this goal through planning and policy guidance; facilitating healthy civic dialogue; taking action for equity; promoting accurate, accessible public information; providing research, analysis and technical assistance; project acceleration; promoting traditional knowledge and multi-generational values; and conducting rigorous tracking to document progress and ensure accountability. For more information on the CORE Hub, please visit <https://redwoodcorehub.org/>.

These comments come from a distillation of what we have heard through over 100 interviews and conversations with a diversity of interests in the North Coast region.

- 1. CEC should include explicit equity analyses and discussions throughout the strategic planning process, and invest in funded structures that support leadership of BIPOC (black, indigenous, and people of color) and frontline/directly impacted communities in the strategic planning process and for the next three decades as the industry develops***

The CEC should include explicit equity analyses and discussions for each section of the offshore wind strategic plan. Equity analyses should include the protection of cultural resources in the identification of sea space, equitable opportunities in workforce development and economic enterprise - particularly with and not limited to Tribal Nations, transmission development’s ability to deliver energy equity for our rural and Tribal communities where offshore wind is being developed, and mitigating potential impacts on

frontline communities - including potential for increased strains on housing stock, local infrastructure, fire risk, transit stress, changes in the economy, shifts in marine and bay subsistence fishing, community liveability, and more. Offshore wind has the potential to bring significant opportunities and impacts to frontline rural and Tribal communities and local economies. However, these impacts should be explicitly analyzed in the strategic planning of offshore wind in the state of California to mitigate possible environmental injustices such as increases in air pollution and toxic emissions and effluent during the construction and operation phase or increased port activities. It is also imperative that local Tribal law and regulation be factored into the strategic plan and development implementation processes.

This is particularly important as the CEC considers more aggressive gigawatt goals for offshore wind generation by 2030, 2045, and beyond. The goals must be ambitious enough to accelerate our solutions for the climate crisis, while avoiding negative impacts on Black, Indigenous, and Communities of Color, vulnerable and front line communities, including weakening those communities' agency to shape how the industry develops in our region; as well as strengthening the provision of direct benefits—particularly affordable, clean, reliable, and safe energy—to the region.

Additionally, the North Coast region has the 3rd highest rates of Missing and Murdered Indigenous People in the state of California (and the 10th highest rates in the United States).<sup>1</sup> In December 2021, the Yurok Tribal Council issued an emergency declaration about the alarming rates of MMIP impacting the Tribe and Native families and communities across the northern part of the state, inviting local, state and federal partners to join together to address this epidemic.<sup>2</sup> Larger scale development comes with greater potential for harm, as evidenced in large scale energy projects across the US and Canada.<sup>3</sup> Numerous studies and witness reports connect worker camps with increased rates of sexual violence, harassment and trafficking, including an in-depth 2016 report from Amnesty International which documents the connection between violence against Indigenous women and energy development.<sup>4</sup>

As the CEC considers gigawatt goals, it is critical for the long term health and safety of our rural and Tribal region, that the CEC does so with the commitment to development of an independent community-centered and -governed body or steering committee that centers Black, Indigenous and Communities of Color, frontline, and disadvantaged communities to guarantee local agency and community decision-making at all stages of industry development - beyond just a consultative position, including investing in structures that already exist, such

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<sup>1</sup> [Sovereign Bodies Institute & Yurok Tribal Court 2020 To' Kee Skuy' Ney-Wo-Chek' Year 1 Progress Report: MMIWG2 of Northern California](#)

<sup>2</sup> [Yurok Tribal Council Emergency Declaration Issued December 27, 2022](#)

<sup>3</sup> [Thomasine Heitkamp, Dheeshana S. Jayasundara, Roni Mayze, and Rick Ruddell, \*Drilling Down: An Examination of the Boom-Crime Relationship in Resource-Based Boom Counties\*, \*Western Criminology Review\*, 2014](#) and [Sierra Crane-Murdoch, \*On Indian Land, Criminals Can Get Away With Almost Anything\*, \*The Atlantic\*, February 22, 2013](#) and [Abaki Beck, \*Why Aren't Fossil Fuel Companies Held Accountable for Missing and Murdered Indigenous Women?\*, \*YES! Magazine\*, October 5, 2019](#)

<sup>4</sup><https://www.amnesty.ca/sites/amnesty/files/Out%20of%20Sight%20Out%20of%20Mind%20EN%20FINAL%20web.pdf>

as the North Coast Tribal Chairpersons Association. This could support deeper community investment and engagement in not only the early development process but in a healthy and thriving industry for years into the future, as well as deepening state, federal and developer investments in communities where this new industry is being established, and where it will scale up from megawatt to gigawatt levels. In many onland wind projects, the negotiation of benefits and community engagement have been led by developers, leading to great information asymmetries in the decision making process. It is important to learn from those experiences and not repeat processes that disempower communities through mere practices of informing and light consulting, but actually support community decision making power. The CEC is a key player in making this happen.

**2. *It is imperative that the CEC includes support for, investment in and partnership with local communities to determine what the right scale and pacing of development is for those places***

We respectfully request that the CEC be in full support of and put mechanisms in place to secure local agency throughout the planning and development processes. This is of particular concern given the passage last week of AB 205, which has the potential to streamline permitting. Particularly with respect to equity and harm prevention, fast-track permitting must not erode local jurisdictional authority. Local confidence in the state and CEC as partners will be greater if such mechanisms are put in place now, particularly as the state considers more accelerated gigawatt goals.

**3. *The CEC draft planning goals could translate into significant local workforce development and job creation, including opportunities for partnerships with Tribal Nations***

The draft offshore wind planning goals could generate significant local workforce development and job creation in the Humboldt and wider North Coast region. The Schatz Energy Research Center found that the full build out of the Humboldt WEA could create 13,000 full time equivalent jobs during the construction phase and 900 annual jobs during the operations phase.<sup>5</sup> Additionally, thoughtful Local Hire and Targeted Hire policies, including Tribal hiring preferences, could create pathways for frontline communities to access these jobs benefits. The scale of these projects can also open up workforce development pathways that can generate quality, family-sustaining careers. This is a critical time to explore Tribal economic enterprise opportunities as well.

**4. *CEC should incorporate community benefits as part of the economic and community impacts in the strategic plan***

A just transition to a renewable clean energy and climate resilient future means that communities where offshore wind will be developed must realize benefits first and foremost. While we recognize wind as a renewable resource and clean energy source, the byproducts of over-production and extraction of natural resources have caused severe harms in this region historically. The CEC and other California regulators are responsible to ensure guardrails are

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<sup>5</sup> [Steve Hackett and Julia Anderson, California North Coast Offshore Wind Studies Economic Development and Impacts, Schatz Energy Research Center, \(2020\), \(1, 8\)](#)

established to properly pace development and mitigate external risks to the region's residents and ecosystems. Further, to ensure development is paced for the region to benefit. This cannot be an exploitative extractive practice for our rural and Tribal North Coast region, which has a long legacy of state and federally initiated and/or sanctioned natural resource based industry or development - past examples include land grabs and gold mining of the 1800s to damming of the region's rivers, water diversion, and the timber industry. Investment in regional infrastructure and systems surrounding offshore wind must be a priority for all state and federal agencies advancing offshore wind development on the North Coast. The CEC currently has the power and opportunity to put structures into place that will assure local agency, decision making authority and investment. We recommend that this be reflected in the strategic plan.

For the long term health of the North Coast and our ability to be a strong environment for a thriving offshore wind industry, it is important that the strategic plan includes state investment in the strengthening of local grids and energy resilience, as well as key related public infrastructure.

Additional community benefits can also be delivered through these significant offshore wind planning goals. With the stipulations in the New York Bight lease sale as well as New York State funded programs, offshore wind is poised to deliver equitable workforce development through Targeted Hire practices and a significant boost to the domestic offshore wind supply chain.<sup>6</sup> Additionally, the workforce development bidding credits in the Carolina Long Bay offshore wind auctions has set aside a \$42 million investment in nurturing a domestic supply chain and workforce development.<sup>7</sup> As seen in the recent outer continental shelf leases, the offshore wind leasing process can secure significant benefits for local communities. Similar local supply chain and workforce development benefits, as well as support for local infrastructure and communities could be supported through the partial and full development of the Humboldt WEA as well as other potential North Coast offshore wind areas.

**5. *The CEC should include strong investments in monitoring, adaptive management and compliance as part of considering more aggressive gigawatt goals***

This is a new industry and technology for the North Coast region and the US. While many in the region are hopeful for the strides that offshore wind can make in energy, climate and resilience, we are also mindful of the great potential for environmental harm that can be caused if state and federal agencies fast track large scale development without appropriate, local and funded monitoring and mitigation measures included in the strategic plan. We recommend and request that the CEC include funding for a regional equitable structure for monitoring, adaptive management and compliance. While considering gigawatt goals, we must also consider and plan for putting systems in place to address 'bad actors' and/or unforeseen issues.

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<sup>6</sup>[A Shared Vision of the Development of an Offshore Wind Supply Chain, Bureau of Ocean Energy Management \(n.d.\)](#)

<sup>7</sup>[Biden-Harris Administration Announces Winners of the Carolina Long Bay Offshore Wind Auction, Department of the Interior \(May 11, 2022\)](#)

6. ***In its final offshore wind planning goal targets, the CEC should balance state greenhouse gas reduction goals, developer, investor, and regional confidence, and local opportunities/impacts of regional host locations for this new industry***

Past state greenhouse gas reduction related goals, such as the renewable portfolio standard, have been met and exceeded early, suggesting room for more ambitious targets. For offshore wind planning goals, ensuring the targets are set high enough to send clear signals to regions (which must have a planning backstop to conduct local development activities against), developer/investors, energy/transportation sector entities, and other constituencies is crucially important. If five (5) gigawatts by 2030 and greater than twenty (20) gigawatts by 2045 (as proposed by many different interests in the June 27, 2022 workshop) helps ensure accelerated progress toward greenhouse gas reductions, and supports state, federal, tribal, and regional resources and focus on responsible, equity-based offshore wind development, the CEC should consider carefully whether to increase the planning goals from the initial proposal.

Thank you again for your work and the opportunity to comment on the draft report and June 27 workshop. Please do not hesitate to contact us if you have any questions about comments provided here.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jana', with a long horizontal flourish extending to the right.

Jana Ganion, CORE Hub Senior Advisor

A handwritten signature in black ink, appearing to read 'Bryna', with a large circular flourish on the left side.

Bryna Lipper, CORE Hub Advisory Council Member & Chief Executive Officer, Humboldt Area and Wild Rivers Community Foundation

CC: *(listed in alphabetical order)*

The Honorable Virginia Bass, District 4 Supervisor, Humboldt County Board of Supervisors

The Honorable Rex Bohn, District 1 Supervisor, Humboldt County Board of Supervisors

The Honorable Michelle Bushnell, District 2 Supervisor, Humboldt County Board of Supervisors

The Honorable Diane Feinstein, U.S. Senator for California

The Honorable Jared Huffman, 2nd Congressional District, U.S. House of Representatives

The Honorable Steve Madrone, District 5 Supervisor, Humboldt County Board of Supervisors

The Honorable Mike McGuire, 2nd Senate District, California State Senate

The Honorable Gavin Newsom, Governor of California

The Honorable Alex Padilla, U.S. Senator for California

Christina Snider, Tribal Advisor to Governor Gavin Newsom

The Honorable Garth Sundberg, Sr., Chair, North Coast Tribal Chairperson's Association

The Honorable Mike Wilson, District 3 Supervisor, Humboldt County Board of Supervisors

The Honorable Jim Wood, 2nd Assembly District, California State Assembly

BOEM California Intergovernmental Renewable Energy Task Force