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*Comment Received From: Redwood Region Climate and Community Resilience Hub
Submitted On: 2/8/2023
Docket Number: 17-MISC-01*

**CORE Hub Comments on CEC Report on Preliminary Assessment
of Economic Benefits of Offshore Wind**

Additional submitted attachment is included below.

February 8, 2023

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

Re: Comment on Commission Report on Preliminary Assessment of Economic Benefits of Offshore Wind

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 Preliminary Assessment of Economic Benefits of Offshore Wind published on December 16, 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/>.

For the California North Coast region¹ (the “Region”) offshore wind provides a tremendous opportunity to fight climate change and promote climate resilience. This also presents an important opportunity to proactively shape the industry in a way that improves community well-being; strengthens partnerships with local communities, Tribal Nations, state and federal agencies; and protects biodiversity. Community-driven development is essential on the North Coast, a region that has experienced long-term harm from a violent boom and bust natural resource extraction economy.

¹ The “North Coast Region” encompasses: 1) Humboldt County, 2) Del Norte County, and 3) the Tribal lands of the Bear River Band of the Rohnerville Rancheria, Big Lagoon Rancheria, Blue Lake Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, Elk Valley Rancheria, Hoopa Valley Tribe, Nor Rel Muk Wintu Nation, Resighini Rancheria, Tolowa Dee-ni’ Nation, Tsnungwe Tribe, Wiyot Tribe, and Yurok Tribe of California, which are the Tribal Nations in each County. Although jurisdictionally independent from each other, these three areas function as one ecosystem through collaborative workforce and education systems, common infrastructure, and a shared history. The region’s history of resource and human exploitation has particularly harmed the region’s Indigenous peoples.

The CORE Hub appreciates the tremendous effort of Commission staff and partners in developing the report as a starting guide to understanding and realizing the economic benefits of offshore wind. The following comments and recommendations are based on a set of community development principles prioritized by the North Coast Offshore Wind Community Benefits Network (see Appendix A) and the results of over 200 interviews and meetings with community leaders that informed those principles and CORE Hub's related strategy.

Recommendations:

1. The report is very high level and does not include meaningful specificity necessary to guide a fully informed process. We imagine that a more thorough economic cost benefit analysis and related recommendations is forthcoming. To help allay concerns about the level of detail not in the report, we recommend including next steps and related timeline for when such analysis and recommendations will take place and be published for comment.
2. The report only partially accounts for offsetting investments that impact the industry's overall potential economic and workforce benefits. Subsequent analysis should more comprehensively account for the investments and benefits associated with offshore wind development, thus allowing local communities to better avoid negative impacts, tailor any mitigation measures, and guide community benefits.
3. If the offshore wind industry cluster is going to reach its potential to support California and the US in our pursuits of climate resilience, we must evolve development practices to include more environmentally advanced, equitable and socially sound principles and terms. We are not going to achieve equitable climate and community resilience by using decades old economic and port development practices. We ask the CEC to consider shifting the way the report is presented to offer insights into how workforce and port development can be done in a way that is healthy and sustainable in the long term for host communities. Include economic benefits of environmental stewardship as part of the development practice for the offshore wind industry cluster. Offer recommendations for how to approach development with Tribal and local governments in a way that does not perpetuate boom and bust cycles of industrial development. We also recommend economically quantifying environmental benefits of offshore wind as part of the report.
4. Noted on page 16 of the report is the requirement in the Economic and Workforce Development and Identification of Port Space and Infrastructure section of AB 525 to include a detailed assessment process to consider potential impacts to natural and cultural resources, including coastal resources, fisheries, and Native American and Indigenous Peoples. Unfortunately, the report largely does not address those critical elements of the project, all of which have economic implications. The CORE Hub recommends that this Economic Benefit Report address those issues and provide related economic analysis and recommendations.
5. Significant coordination, planning, capacity building and both hard and soft infrastructure investments are required of Tribal governments, local governments and communities to prepare for and facilitate industry cluster development. It is important that such community

investments be included in the report as critical steps to realizing the full potential economic benefits of workforce and port developments, while also helping to minimize negative impacts, guide needed mitigation efforts, and tailor proactive benefits measures for communities.

6. Thank you for including environmental monitoring jobs as an economic benefit. We recommend including environmental research, monitoring, compliance and mitigation jobs as part of the required workforce noted on page 43 and elsewhere through the report. It is important to set the tone and signal to developers and communities that California is serious about this being a truly renewable resource and is prepared to shift away from business as usual.
7. Incorporate opportunities for greening of the workforce and ports, and describe the long term economic benefits of that approach.
8. Each community where offshore wind will be developed has unique infrastructure contexts. In order to more fully understand the economic benefits of offshore wind in our communities, an accounting of adjacent infrastructure investments and analysis of how those might be supported through development of offshore wind is important. In Humboldt County for example, water system and road improvements will need to be made in the community immediately surrounding the port and have a very high likelihood of being addressed as part of the region's transition to offshore wind. Accounting for examples like this is important and not quite represented in the overview of induced and indirect benefits from port development outlined in Chapter 3.
9. Under AB 525, the CEC is required to provide recommendations for workforce standards for offshore wind energy facilities and associated infrastructure, including local hiring and targeted hiring standards that ensure sustained and equitable economic development benefits. This report is an important opportunity to address and lay the groundwork for how equitable workforce standards will be incorporated into the planning and development process. Currently, the report does not do so. We recommend that the CEC include strategies and incentives for prioritizing equity in workforce development, such as high leverage approaches to targeted hire for local residents who are Tribal members, Black Indigenous and People of Color; transgender and nonbinary people; or those who have potentially career-limiting circumstances, such as income (at or below 100% of the Federal Poverty Level); history of involvement with the criminal justice system; English language learners; workers in the process of applying for residency or citizenship; protracted unemployment (six months or more); low level of literacy; people with disabilities; custodial single parents; former foster youth; no high school diploma or GED; and older adults. The report should also include pathways for exploring Tribal workforce partnerships.
10. We appreciate the attention the report gives to apprenticeships. Local labor and workforce leaders have argued time and again for pre-apprenticeship programs as part of the strategy needed to build out the offshore wind industry cluster. We recommend that the report emphasizes and plans for specific investments in apprenticeships and pre-apprenticeships to

create a trained and skilled offshore workforce. Without this there will be few local benefits to workers, especially to Tribal Nations.

11. The CORE Hub recommends that the report acknowledge the risk for vulnerable populations in rural and Tribal communities when large volumes of out of area workers saturate a development project to support rapid construction. Call out the crisis of Missing and Murdered Indigenous People and include approaches to reducing risks of exacerbating such abuses, which may include but are not limited to: partnerships with Tribes on the most appropriate way to address the issue; local workforce plans with elements to ensure local community safety to apply to all workers, including both direct employees and contractors; local hiring and minimizing the use of short-term or transient workers and a plan to address the challenges that come with large quantities of transient workers moving into a community; adequate housing for out of area workers; training on trafficking and the history of the area for leadership and workforce; strict rules and enforcement practices for sexualized and intimate partner violence; whistleblower protections; and other mechanisms recommended by the many experts working on this issue throughout the state and the regions hosting development.
12. The report should include more about the role of local and Tribal governments in assessing workforce needs, assets and opportunities, and creating workforce and career pathway plans and strategies that meet local goals and leverage existing assets in partnership with developers, the state, and local jurisdictional authorities with port development oversight.
13. Include community benefits agreements requirements for port development funding and permitting processes as an important piece of realizing the full economic benefits of such efforts for host communities.
14. Increased electrification to local communities should be addressed as an economic benefit, and a requirement to support local communities in realizing the full potential of economic benefits from offshore wind.

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

Sincerely,



Katerina Oskarsson, CORE Hub Executive in Residence

CC: *(listed in alphabetical order)*

The Honorable Natalie Arroyo, 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

North Coast Offshore Wind Community Benefits Network

Who We Are

- The **North Coast Offshore Wind Community Benefits Network** is a diverse group of Tribal Nations, local government agencies and educational institutions, labor leaders, local community-based organizations, and community residents.
- We are united in our belief that **if our region hosts offshore wind development, it must benefit our communities**, especially those who have been left out of these conversations and harmed by past development and that it must be developed sustainably to protect natural resources.
- We support and work collaboratively with those communities to create **an equitable and secure future for generations to come and center their voices in decision-making**.

Community Benefits Recommendations

- An equitable and sustainable transition to offshore wind requires strong collaborative regional leadership. We ask that developers, local, state and federal agencies engage with and prioritize funding for cross-interest community-led, democratic decision-making groups with representatives from disadvantaged communities, regional Tribal Nations, local governments, and community-based organizations. Strong Tribal and environmental justice community engagement plans at every step of development and operations are critical to ensuring wind industry development happens in a way that will help the North Coast thrive for generations to come. These investments in community capacity must happen to achieve regional self-determination.
- Investments in and protections for Tribal Nations and communities are critical to the success of an offshore wind effort on the North Coast. This includes state and federal funding into specific Tribal capacity and fisheries funds democratically-managed by Tribal and Indigenous leaders to minimize the impacts of new industry. There must also be investments in Tribal offshore wind industry cluster economic development and enterprise, as well as Tribal leadership to advance offshore wind in a way that protects cultural resources and the environment. It is critical that local, state and federal process account for, include and require safety mechanisms to minimize the risk development has for increasing the rates of Missing and Murdered Indigenous Peoples.
- We must ensure that impacts are minimized, mitigation efforts are prioritized, and benefits are realized for commercial fisheries and portside communities through permitting, leasing and regulatory frameworks; specific community funds; local, state and federal resource investments and partnerships; and supporting the leadership capacity of those sectors and communities to influence and navigate the transition to offshore wind.

Community Benefits Recommendations (Continued)

- It is imperative that we have strong partnerships with developers and local, state and federal agencies, as well as support from the Biden-Harris Administration, to deeply invest in community services and resilient infrastructure such as port and harbor development; grid infrastructure in our rural and Tribal communities; education, housing and other critical adjacent infrastructure; frontline, Indigenous and Communities of Color; and under resourced areas. This includes special funding designations, reducing barriers to planning and implementation grants, budget allocations, and resourcing of a North Coast Community Fund and a Regional Tribal Capacity Fund to be democratically-managed by community.
- Environmental protections and investments in regional capacity for related science, design and decision making are priority community benefits for the Network. For the offshore wind industry cluster to be successful, there must be strong requirements in permitting and regulatory processes as well as funding for science-based and culturally-sensitive monitoring, research, and investments in environmental protections that minimize negative impacts on birds, marine life, and coastal ecosystems. We would like to see mechanisms developed to transparently share data on wildlife and ecosystem impacts. We must ensure investments in Tribally-led research/monitoring efforts. Additionally, environmental protections for decommissioning are critical to institutionalize now.
- It is clear that North Coast communities want and are motivated to develop high-quality career training and career path opportunities for local residents in all phases of development, operations and decommissioning, including careers in related supply chain sectors. Job training and economic development investments must include community workforce and labor agreements and commitments to prioritizing Tribal Nations and underrepresented communities. Given the region's history with boom and bust extractive economies, we must plan for strong economic protections if/when offshore wind industry cluster projects are decommissioned.
- We continue to advocate for federal resource investments that facilitate more flexible funding to our community as a critical partner in offshore wind development. This includes but is not limited to a revenue share model that would direct auction and lease monies into community managed and governed funds for community investments (regional fund, Tribal fund, and environmental fund), as well as specially designated funding for partner communities hosting and facilitating development of this new industry. Resource investments are needed to ensure that development happens equitably and sustainably, including funding for community capacity building and planning, direct and adjacent infrastructure improvements, growing local regulatory frameworks and mechanisms for environmental protections.

Why these commitments are critical to regional resilience and success:

Equitably Achieve Climate & Energy Resilience Goals

Equitable offshore wind development in our region presents a unique opportunity to

- address multiple energy and grid reliability issues at once with clean energy including mitigating distribution level capacity issues in Humboldt;
- meet bold state and federal climate and offshore goals, and achieve energy independence and security;
- create a global model for equitable, community-driven clean energy projects.

Invest in a Strong Local Economy, High-Quality Careers, and Tribal and Commercial Fisheries

Equitable offshore wind investments can lead to our region's long-term health and prosperity. To achieve processes and outcomes supported by our communities, these investments must be accompanied by

- financial commitment to establishing and funding community-governed funds;
- funding to plan for, design and develop the transition to wind across varying interests
- equitable workforce commitments, development opportunities and programs; and
- community investments tailored to our communities' most imminent infrastructure and community needs.

Ensure Benefits to Tribes and Underrepresented Communities

Through the community benefits framework outlined here, state, federal and developer resources will be directed to the North Coast Communities and permitting and regulatory frameworks will memorialize strong community benefit operational practices, especially in support of underrepresented and frontline communities and Tribal Nations. Our region lives with a legacy of historic and persistent cycles of racialized boom and bust extractive natural resource industries. Related structural underinvestment has resulted in infrastructure needs that must be addressed to support offshore wind. Our community benefits framework will make paradigm-shifting changes and can empower the most-impacted communities to actively participate, drive the decision-making process, and benefit from the offshore wind industry cluster.