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**Brightline Defense comments on Preliminary Assessment of  
Economic Benefits of Offshore Wind**

*Additional submitted attachment is included below.*



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February 8, 2023

California Energy Commission  
Docket number 17-Misc-01  
715 P Street  
Sacramento, CA 95814

**Re: The preliminary assessment of the economic benefits of offshore wind related to seaport investments and workforce development needs and standards.**

Dear California Energy Commission,

Brightline is an environmental justice organization that has been actively engaged in floating offshore wind development. Offshore wind is a large-scale clean energy source that has the potential to bring thousands of skilled and trained jobs to Californians. In addition to port infrastructure being critical to the offshore wind development process, port improvements can also mitigate pollution impacts on local, historically underserved communities.

We appreciate the thoughtful analysis put into the preliminary assessment of economic benefits by the California Energy Commission and lengthening of the public comment opportunity to allow for robust discussions and input. The following comments are offered in response to the California Energy Commission's preliminary assessment of the economic benefits of offshore wind related to seaport investments and workforce development needs and standards.

Preliminary Assessment of the Economic Benefits of Offshore Wind Related to Seaport Investments and Workforce Development Needs and Standards

*Robust discussion of economic benefits of skilled and trained labor should be included*

The preliminary assessment should include a robust discussion and evaluation of additional benefits and value that skilled and trained labor construction can bring to offshore wind. In addition to the research conducted by academic institutions on the jobs potential with seaport investments, skilled and trained labor benefits, especially during construction and maintenance phases of seaport development, should be incorporated in the final assessment. This can include a further discussion of the findings of the report, *Putting California on the High Road: A Jobs and Climate Action Plan for 2030* which highlighted the importance of unionized labor in building California's climate just future.<sup>1</sup> Skilled and trained labor can bring further offshore wind benefits by not only providing jobs but good, family-sustaining jobs for California.

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<sup>1</sup>Carol Zabin, Roxane Auer, J. Mijin Cha, Robert Collier, Richard France, Jenifer MacGillvary, Holly Myers, Jesse Stretcher, Steve Viscelli, *Putting California on the High Road: A Jobs and Climate Action Plan for 2030*, UC Berkeley Labor Center, <https://cwdb.ca.gov/wp-content/uploads/sites/43/2020/09/AB-398-Report-Putting-California-on-the-High-Road-ADA-Final.pdf>.

*Additional economic benefits of targeted policies should be considered*

In addition to the added value skilled and trained labor can bring to California's offshore wind seaport investment and workforce development needs, the assessment should include consideration and discussions of the impacts of other policy levers on economic benefits that offshore wind can bring. These levers include Local and Targeted Hire or investments into California's supply chain supporting disadvantaged- and women-owned business enterprises. Local and Targeted Hiring practices can create and sustain long-term career pathways for underemployed, local, hard-to-reach, and historically disadvantaged communities. The Local and Targeted Hire policies, when coupled with mandatory minimum percentage requirements, apprenticeship programs, and training programs, can bring significant additional economic benefits. Supporting disadvantaged- and women-owned businesses can also strengthen and confer further benefits to Californians, especially in businesses that support non-offshore wind related functions in Tier 3 and 4 of the domestic supply chain. These and other policy levers should be included in the final assessment to consider the additional benefits these policies can bring to Californians.

Offshore wind in California represents a significant opportunity for investments in historically underserved communities, Tribes, and communities local to offshore wind development. The AB 525 (Chiu, 2021) strategic report should include further considerations that support the development of a skilled and trained workforce and delivery of targeted economic opportunities to historically underserved communities. We hope to see the California Energy Commission move to support strong community benefits and build a skilled and trained local workforce for California.

Signed,

A handwritten signature in black ink, appearing to read 'Eddie Ahn', with a stylized flourish at the end.

Eddie Ahn

Executive Director, Brightline Defense

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