

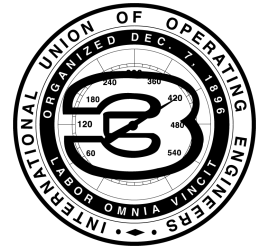
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**Offshore Wind Now Coalition Comment on the Preliminary
Assessment of Economic Benefits of Offshore Wind**

Additional submitted attachment is included below.



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,

We appreciate the opportunity to submit these comments in response to the preliminary reports and workshop of the California Energy Commission of the preliminary assessment of the economic benefits of offshore wind related to seaport investments and workforce development needs and standards.

This coalition is made up of labor, environment, business, and environmental justice organizations standing together in support of California going big on offshore wind as quickly as high-road, environmentally responsible, and equitable development will allow in light of the urgency of the threats posed by climate change, and the potential of offshore wind as a clean energy power source. As referenced in the preliminary assessment of economic benefits of offshore wind, offshore wind development in California has the potential to create thousands of quality, family-sustaining jobs and deliver large-scale clean energy to the state. Continued thoughtful policies and engagement of local communities can bring further community benefits.

Skilled and Trained Labor Brings Significant Benefits to California

Skilled and trained Labor can create generational and family-sustaining jobs for Californians. The California Energy Commission's assessment on the economic benefits of offshore wind should include further discussion of benefits from skilled labor and not only the overall jobs potential. In addition to job benefits, skilled and trained labor also provides additional economic benefits through safety, training, job quality, and ensuring that local, California-approved apprenticeship programs can fill these jobs with a workforce working toward career goals and gaining necessary skill sets on the job toward lifetime careers. The assessment of workforce development needs and standards should further discuss the role of skilled and trained labor in delivering the maximum benefits for Californians. Such workforce development programs, as apprenticeship programs, foster workforce participation particularly among underrepresented and underserved populations. Many coastal communities lack local jobs.

Community Benefits Can Bring Further Benefits

In addition to skilled and trained Labor, local communities can benefit from offshore wind through the delivery of community benefits. Local communities will be most impacted by offshore wind and seaport development which can include strains on housing affordability, cost of living, and port-related air quality impacts. As a result, California should consider implementing formal and legally enforceable Community Benefits Agreements as a key opportunity to support communities local to offshore wind development. Community Benefits Agreements could include investments and funding for historically underserved communities, community resiliency programs, and additional community infrastructure development to mitigate the impacts by offshore wind and seaport development. Community Benefits Agreements should be based on a set of four core interdependent priorities: engaging communities and labor; investing in California's workforce; advancing diversity, equity, inclusion, and accessibility; protecting the environment, and work to maximize benefits flowing to disadvantaged communities. The California Energy Commission should provide guidance on the development of Community Benefits Agreements that includes community and labor engagement plans, a workforce impacts assessment, impacted communities assessment, and a diversity, equity, inclusion and accessibility plan. Each of these sections should include robust assessment, and also consider risk factors for communities achieving benefits and methods for avoiding, minimizing, and mitigating that risk. An example of robust guidance on development of a Community Benefits Agreement can be found in the Department of Energy's guidance document for a Bipartisan Infrastructure Law Funding Opportunity Announcement related to carbon capture demonstration projects (FOA Number: DE-FOA-0002738).

Utilizing Local and Regional Content Maximizes Job Creation

The greatest job creation potential for California's offshore wind industry will result from maximizing in-state manufacturing. The California Energy Commission's economic benefits assessment should include greater detail regarding the types of manufacturing opportunities as well as requirements for workers and businesses to access those opportunities, including necessary certifications, pre-approved apprenticeship programs and standards, and physical requirements. The assessment should also include existing manufacturing capabilities within the state with transferable skills, products, and services that may be expanded or leveraged in the creation of a West Coast floating offshore wind supply chain. Finally, the California Energy Commission should assess conditions that would encourage the high-road development of a West Coast floating offshore wind supply chain such as prioritizing projects that utilize content made in California or the West Coast. This should include methods for ensuring job quality and safety, such as union neutrality commitments which protect workers rights to organize a union and bargain collectively.

With the close of the first offshore wind auction in California last year, there is significant opportunity and excitement to bring this new industry to the state. There is incredible potential to bring significant benefits and quality, family-sustaining jobs. The wide-scale, generational impacts of offshore wind on local communities should not be overlooked and the preliminary economic benefit assessment should identify further opportunities to deliver benefits and for community engagement. The AB 525 (Chiu, 2021) report process is a critical opportunity to identify California's goals and role in bringing transformational change to California while setting the stage for further equity-driven, environmentally responsible, and high-road development.

Signed,

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