

**DOCKETED**

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## **Comment on AB 525 Conceptual Permitting Roadmap**

Thank you for the tremendous work in facilitating this process. We appreciate your consideration of the CORE Hub's comments on the Conceptual Permitting Roadmap.

*Additional submitted attachment is included below.*

February 10, 2023

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

**Re: Comment on AB 525 Conceptual Permitting Roadmap**

Dear Chair Hochschild and Esteemed Commissioners:

The Redwood Coast Climate and Community Resilience Hub (“CORE Hub”) appreciates the opportunity to comment on the Draft Conceptual Permitting Roadmap published on December 15, 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 region<sup>1</sup> (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.

The CORE Hub appreciates the tremendous effort of Commission staff and partners in developing the Conceptual Roadmap as a starting guide to facilitating the permitting process for offshore wind

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<sup>1</sup> 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.

facilities. 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 Roadmap notes that "...robust interagency agreements that articulate a common vision and shared commitments are the cornerstone of successful large-scale planning efforts." Interagency cooperation in developing a framework for offshore wind development has been very successful to date. We agree that there is significant value in continuing and fully funding that coordination through implementation of the AB 525 strategic plan.

The CORE Hub appreciates that the Roadmap includes strong permitting process coordination, design and facilitation with local agencies. Local agencies must also be funded as critical partners in advancing an efficient permitting process. We recommend local funding be part of the underlying assumption noted above.

It is critical that the Roadmap include Tribal Nations as key parties engaging in the articulated common vision and shared commitment noted above, and that Tribal Nations also receive funding for coordination and leadership in the shared planning process. While communication and coordination with Tribal Nations is noted through three different processes in the Roadmap - BOEM's Native American Tribes Communications Plan required through the PACW-1 lease, AB 52 and the National Historic Preservation Act, it is not clear that Tribes are part of that vision articulation process.

2. In order for the permitting process to move forward as expediently as possible, more robust engagement of Tribal Nations, local agencies and communities prior to the permitting process is important. Currently, the state is not investing in or funding regional capacity to engage with offshore wind. The timeline is swift and local interests are working hard to keep up and stay fully informed, engaged and lead in the process. Without the state's support of flexible resources coming to the region to grow our capacity to engage, plan, provide leadership, and inform process, we fear the circumstances are being created that will reinforce opposition. The state needs to fund local capacity to facilitate transition to offshore wind and we recommend including that in the Roadmap.
3. The Conceptual Permitting Roadmap should clearly identify further public engagement opportunities. The Roadmap does not include significant focus on opportunities for local parties and other interested entities to engage in the offshore wind permitting process beyond what is required by law. Opportunities for communities to raise concerns should be clearly identified beyond just opportunities legally required.
4. The Roadmap should discuss enforcement mechanisms and decommissioning. It should clearly identify enforcement mechanisms in the permitting and monitoring process for

effective adaptive management, as well as further information on future decommissioning processes.

5. Full data transparency must be integral to all phases of the permitting process, and include the free sharing with the public of lessee-obtained environmental and biological data from all stages of the permitting process, including decommissioning, whereby biological data or analysis, including raw data, analysis, surveys, and reports will not be considered proprietary information of the lessee.
6. The CORE Hub recommends that the permitting process require detailed plans for adaptive management and decommissioning, and that a funding mechanism for decommissioning be outlined in the Roadmap.
7. Streamlined permitting is going to be important to move offshore wind forward, and it cannot come at the cost of Tribal and local agency participation, and community engagement. During the Commission's Permitting Roadmap workshop and in written comments that followed, there were a number of requests to shorten the 180 day timeframe for interagency MOUs and coordination plans to be developed and executed by all parties. We encourage the CEC to retain the 180 day timeframe currently noted in the Roadmap. Diligence and capacity to fully participate in developing a streamlined process is important. We understand the importance of moving forward as expeditiously as possible. That is more likely to happen if key community actors feel confident about the processes and frameworks that are being developed to implement offshore wind, which takes time.
8. The Roadmap should clearly articulate how environmental impact, mitigation and stewardship concerns have the potential to be more effectively addressed through a streamlined process. People with environmental impact concerns want to make sure that a streamlined process doesn't require sacrifice of robust environmental analysis and recommended mitigation or stewardship measures. It would grow confidence in a streamlined process for this to be explicitly addressed in the Roadmap.
9. The Roadmap should include permitting processes for port development and transmission. If that is not possible, it should include a more robust description and related timeline of how those processes will be integrated into a future iteration of the Roadmap.

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,

A handwritten signature in black ink, appearing to read "Katerina Oskarsson". The signature is fluid and cursive, written in a professional style.

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