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*Comment Received From: Brightline Defense
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on the Draft Conceptual Permitting Roadmap

Additional submitted attachment is included below.



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February 10, 2023

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

Re: The permitting roadmap for offshore wind energy development off the coast of California.

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 work put into the permitting roadmap 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 conceptual permitting roadmap for offshore wind energy development off the coast of California.

Conceptual Permitting Roadmap should clearly identify further public engagement opportunities

The conceptual permitting roadmap includes many considerations to the coordination of state, Tribes, and federal agencies, including the Bureau of Ocean Energy Management (BOEM) lease communication plan requirements. However, the permitting roadmap should clearly identify and include more robust and transparent opportunities for local parties and other interested stakeholders to engage in the offshore wind permitting process beyond what is required by law and the non-statutory opportunities in the BOEM auction process. Additionally, to allow for enough time for robust community and coalition input to the permitting process, the minimum period for public comment and engagement should be longer than the default amount of time offered in the permitting process. Further opportunities for engagement identified early on as well as sufficient length of public comment periods should be included in the permitting roadmap.

Conceptual Permitting Roadmap should discuss enforcement mechanisms and decommissioning

Enforcement mechanisms in the permitting and monitoring process, as well as decommissioning process, should be further elaborated upon in the conceptual permitting roadmap. The permitting roadmap should identify opportunities for continued engagement and enforcement mechanisms during the construction and operation of offshore wind infrastructure. The roadmap should additionally include offshore wind infrastructure decommissioning pathways and safeguards to prevent repeating historical abandonment of

outdated or aging energy infrastructure. The strategy should also identify opportunities to decommission fossil fuel infrastructure, particularly those around low-income and historically disadvantaged communities as well as the over 20 offshore oil and gas platforms off the coast of California. For robust adaptive management practices, evaluation of activities, and decommissioning, the permitting roadmap should clearly identify key periods where compliance with permits and agreements are assessed. The roles of the Joint Review Panel in the monitoring and adaptive management process should be further enumerated.

Furthermore, Californian communities have historically seen boom-and-bust industries and energy generation industries that have left a legacy of abandoned infrastructure. To avoid these impacts, the permitting process should also clearly identify the role of each agency and party with supporting eventual decommissioning of individual wind turbines as well as overall projects. The long-term monitoring and permitting needs of offshore wind should be clearly identified in the permitting roadmap, including opportunities for adaptive management practices and decommissioning of offshore wind-related infrastructure.

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 further transparency and opportunities for community input and oversight. 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 extending from the end.

Eddie Ahn

Executive Director, Brightline Defense