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**Comments on CEC Workshops on AB 525**

*Additional submitted attachment is included below.*



1028A Howard Street  
San Francisco, CA 94103  
415.252.9700 | [brightlinedefense.org](http://brightlinedefense.org)

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June 9, 2023

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re: Comments on CEC Workshops on AB 525 (Docket No. 17-MISC-01)**

Dear California Energy Commission,

We appreciate the opportunity to submit these comments in response to the breadth of work on the strategic plan for offshore wind under AB 525 and in response to presentations at workshops hosted by the commission in late May 2023 and early June 2023.

Brightline Defense Project (Brightline) is an environmental justice nonprofit deeply engaged and interested in the equitable development of offshore wind in California. We were excited to see the incorporation of equity language and the California Energy Commission's (CEC) progress on crafting a strategic clean energy vision for offshore wind that can generate economic opportunities and deep long-lasting benefits to underserved communities across the West Coast.

*Offshore wind will bring significant impacts to California*

As the research presented by Xodus and Catalyst consultants reiterates, offshore wind can bring economic benefits to California's North and Central Coasts. We also appreciated the potential of policies to increase the economic benefits that offshore wind offers such as the implementation of targeted hire policies, apprenticeships, and iterating on the high-road training programs. Specific and targeted programs have the potential to particularly benefit underrepresented, low-income, and historically underserved communities. The scale of economic and workforce potential of offshore wind development will bring big changes to California communities.

With the significant impacts of offshore wind development, the California Energy Commission should further consider elements for justice beyond jobs. The awesome jobs potential can also negatively impact local communities including increased strains on housing availability and affordability, increased cost of living, and negative air quality impacts near port developers. The strategic offshore wind plan should consider opportunities for implementing support for local communities to address growing concerns on negative impacts. These investments could be allocated to community resiliency programs, funds for historically underserved communities to expand capacity for engagement in the offshore wind development process, community infrastructure, cultural resources protection, and adaptive management projects. Additionally, the CEC should provide robust guidance with and for communities to advance diversity, equity, inclusion, and accessibility while maximizing benefits flowing to local and disadvantaged communities. Communities near offshore wind developments should see benefits beyond jobs.

*Transmission design should consider energy reliability and resiliency benefits*

A number of transmission pathways and considerations were presented during the recent workshops attempting to tackle challenges of interconnections throughout the state and delivering the energy generated by offshore wind to population centers. A critical component that should be further explored and discussed are the transmission opportunities to increase energy reliability and resiliency in the North and Central Coast communities. The North Coast especially sees significant power outages every year and is vulnerable due to limited interconnections with the wider grid. Frequent and prolonged power outages can pose dangers to the health and security of communities. Transmission planning for early offshore wind development in the Wind Energy Areas should consider opportunities to strengthen the existing grid while delivering energy to Tribes and rural communities.

Brightline looks forward to continuing to work with the California Energy Commission to advance the AB 525 strategic plan. We appreciate the invitations for Brightline to speak at the CEC's various workshops and panels on offshore wind, as well as the incorporation and consideration of Brightline's previous comments on the AB 525 strategic plan. Offshore wind has the opportunity to bring significant benefits and jobs to communities for generations to come especially with the adoption of thoughtful policies and investments in communities.

Signed,

A handwritten signature in black ink, appearing to read 'Eddie Ahn', with a long horizontal flourish extending to the right.

Eddie Ahn  
Executive Director, Brightline Defense