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**Brightline Defense Comments to Offshore Wind Waterfront Facility Improvement Program**

Please see the attached document for our comments.

*Additional submitted attachment is included below.*



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December 1, 2023

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Comments on the Grant Solicitation of the Offshore Wind Waterfront Facilities Improvement Program (Docket No. 23-MISC-01)**

Dear Chair Hochschild and Commissioners,

Brightline Defense Project (“Brightline”) appreciates the opportunity to submit comments on the California Energy Commission’s (“CEC”) Grant Solicitation for the Offshore Wind Waterfront Facilities Improvement Program, which was created as a funding program for offshore wind infrastructure investment through Assembly Bill 209 passed during the 2022 California Legislative session.

Brightline is an environmental justice organization dedicated to empowering communities to build sustainable environments. In addition to advocating and analyzing the development of renewable energy through the lens of equity, our nonprofit empowers communities through air quality monitoring, job training, youth leadership, and other forms of capacity building for underserved communities in the San Francisco Bay Area.

The Offshore Wind Waterfront Facilities Improvement Program can help bring necessary port infrastructure improvements critical to California’s readiness for offshore wind. However, this program should consider benefits for frontline and historically underserved communities. The following comments are offered in response to shaping the criteria selection in the grant solicitation of the Offshore Wind Waterfront Facilities Improvement Program.

*Meaningful Leadership and Engagement of Tribal Nations, Disadvantaged Communities, and Fishing Communities*

The funding from this grant solicitation process has the potential to continue investment in offshore wind infrastructure in California. Through this process, the CEC should seek applicants who have demonstrated meaningful engagement with Tribal Nations, Disadvantaged Communities, and Fishing Communities.<sup>1</sup> There is an opportunity for these community members to have considerable benefits from port infrastructure. This is important considering different offshore wind port types and how these ports will impact communities in materially different ways. This cannot happen without measurable engagement and outreach.

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<sup>1</sup> Defined by California's Disadvantaged Communities Advisory Council (“DACAG”) defines Disadvantaged Communities by receiving an overall score of the top 25% on California EnviroScreen, Tribal lands, census tracts with Area Median Income (AMI), and/or State Median Income less than 80%, and households with median household incomes less than 80% of AMI. Final Designation of Disadvantaged Communities pursuant to Senate Bill 535, California Environmental Protection Agency, (May 2022), [https://calempa.ca.gov/wp-content/uploads/sites/6/2022/05/Updated-Disadvantaged-Communities-Designation-DAC-May-2022-Eng.a.hp\\_-1.pdf](https://calempa.ca.gov/wp-content/uploads/sites/6/2022/05/Updated-Disadvantaged-Communities-Designation-DAC-May-2022-Eng.a.hp_-1.pdf).

Environmental justice is a highly localized issue and different geographic regions will have separate barriers and needs. Early and continued engagement should be conducted throughout the entire project to meet community needs and meaningfully participate in the offshore wind development process.

Additionally, there should be language in the grant solicitation that supports investments in the community or community benefits as an outcome of port and waterfront facilities improvements. The criteria to include such benefits must address meeting any potential needs which can include and are not limited to affordable housing, Local and Targeted hire, community safety, increasing access to park spaces, road infrastructure, transportation, broadband internet access, and reliable and affordable energy.

#### *Addressing Environmental Impacts on Port Communities*

Different offshore wind port types may also translate into different environmental impacts on the surrounding communities. Port revitalization is required to meet the transformational needs for the development of offshore wind, but the impacts of development are of concern. Ports and waterfront facilities have historically been sited next to low-income and Disadvantaged Communities that have faced generations of poor air quality. Activities at ports including the use of ships, diesel trucks, and construction-related equipment could increase air pollution in these adjacent communities. Increased air pollution can lead to exacerbated health impacts which ultimately can lead to compounding strains on the nearby residents. Additionally, port development could result in further environmental impacts on wildlife and ecosystems. These impacts may vary depending on port type.

Through this expansive and necessary undertaking of port development, the grant solicitation should consider how ports plan to address the mitigation of any impacts on air quality and the local ecosystem throughout the proposed project process. As California looks to green port infrastructure, there is an opportunity to leverage this funding for ports to develop plans and actionable steps to take that include electrification of ships, trucks, and other port-related equipment that would be used during the construction and operations of offshore wind development.

#### *Conclusion*

Brightline hopes to see language that supports meaningful engagement with impacted communities, addresses air quality impacts, and promotes green port infrastructure in the CEC's Grant Solicitation for the Offshore Wind Waterfront Facilities Improvement Program.

Thank you for your consideration of these comments.

Signed,

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

Eddie Ahn

Executive Director