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PoSF Offshore Wind Waterfront Facility Improvement Program Comments

Additional submitted attachment is included below.



December 1, 2023

Eli Harland
Energy Policy and Planner
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Offshore Wind Waterfront Facility Improvement Program Workshop and Grant Program

Dear Mr. Harland,

The Port of San Francisco recognizes the significant impact offshore wind will have on California's ports, harbors, and waterfront communities. The Port thanks the California Energy Commission (CEC) for the chance to present at the Offshore Wind Waterfront Facility Improvement Program Workshop on November 3, 2023, and for the opportunity to provide feedback on the upcoming grant opportunity.

The Port of San Francisco is well positioned to contribute to the State reaching its offshore wind energy goals. Located between the north and south call areas, the Port is unique among California ports. The Port's jurisdiction includes self-scouring deep-water berths and contains existing, underutilized industrial property.

The Port has been identified by the State Lands Commission's (SLC) Port Readiness Plan as a site of both Fabrication and Manufacturing and Operations and Maintenance facilities. Due to the Port's structure as a self-supporting enterprise agency, funding is a critically important issue. As noted in the SLC's report, California ports and harbors need significant investment to improve their infrastructure to accommodate the needs of offshore wind development.

California's development of floating offshore wind is driven by the need to address climate change. With that foundational principle in mind, port investments should strive to make resilient landscapes both physically and socially.

The Port of San Francisco supports the funding approaches presented by the California Energy Commission's staff and respectfully offer these additional recommendations for consideration:

1. Builds upon the multipoint strategy presented in AB 525 Port Readiness Plan:
 - a. Award funding for ports and harbors as non-competitive grants.
 - b. Differentiate between OSW site uses to promote a balance of port and harbor functions.
2. Prioritize ports and harbors with existing land and permitted site uses.

3. Consider the port's existing funding and match support needs.
4. Evaluate funding requests as a percentage of a project's overall design/construction costs and prioritize those projects with higher percentages covered through this funding opportunity.
5. Prioritize those projects that can meet the requirements of the first 5 BOEM PACW-1 leases. Projects with shorter time frames and ability to be operational within the nearer term future.
6. When identifying other federal grant programs, consider FEMA grant funding as an area for match support.
7. Prioritize those projects that account for sea level rise and/or seismic stability.
8. While it may be too early for specific community concerns to have been identified or resolved, consider initial community coordination efforts as a commitment to surfacing and addressing concerns.
9. Prioritize those projects that include potential community benefits such as local employment, job training, or partnership with local universities/colleges/or trade schools.
10. Consider physical community benefits to under resourced communities such as increase tree canopy, increased wildlife habitat, stormwater improvements, and/or site screening.

Offshore wind represents a generational opportunity for reinvestments in California's ports and harbors. An opportunity to receive CEC funds can allow the Port of San Francisco to advance design, and begin project permitting, and demonstrate a commitment to interested industry partners.

The Port thanks the CEC for its time and commitment to the Offshore Wind Waterfront Facility Improvement Program and looks forward to seeing the final grant program criteria.

Sincerely,



Elaine Forbes
Executive Director
Port of San Francisco