

| DOCKETED | |
|-------------------------|--|
| Docket Number: | 17-MISC-01 |
| Project Title: | California Offshore Renewable Energy |
| TN #: | 255819 |
| Document Title: | Brightline Defense Comments - Brightline Defense Comments on AB 525 Strategic Plan |
| Description: | N/A |
| Filer: | System |
| Organization: | Brightline Defense |
| Submitter Role: | Public |
| Submission Date: | 4/22/2024 6:26:55 AM |
| Docketed Date: | 4/22/2024 |

*Comment Received From: Brightline Defense
Submitted On: 4/22/2024
Docket Number: 17-MISC-01*

Brightline Defense Comments on AB 525 Strategic Plan

Please see attached pdf for our comments.

Additional submitted attachment is included below.



1028A Howard Street
San Francisco, CA 94103
415.252.9700 | brightlinedefense.org

April 22, 2024
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: Comments on AB 525 Draft Offshore Wind Strategic Plan [Docket number 17-Misc-01]

Dear Chair Hochschild and California Energy Commissioners,

Brightline Defense Project (“Brightline”) appreciates the opportunity to submit comments on the California Energy Commission (“CEC”) draft AB 525 California Offshore Wind Strategic Plan (“Strategic Plan”). We appreciate the work and efforts that CEC staff and commissioners have put into the Strategic Plan as well as the incorporation of previously provided comments. This is a foundational document that provides a pathway forward for offshore wind development in California.

Brightline is a San Francisco-based environmental justice organization dedicated to empowering communities to build sustainable environments. Brightline strives to center community voices and implement equity-driven resource allocation, job training, and justice in frontline communities. Brightline strongly believes that a transition to renewable energy would reduce reliance on fossil fuels and polluting energy sources that negatively impact the health and well-being of low-income communities across California. The need for a transition from fossil fuels to clean energy is also necessary to limit the significant impacts of the climate crisis. However, careful considerations and efforts must be made to develop large-scale clean energy projects responsibly to mitigate, avoid, and limit ecological and socioeconomic harm to California’s diverse communities and habitats.

Offshore wind projects and the development of ports and waterfront facilities related to offshore wind should provide measures for avoidance and mitigation of environmental impacts, benefits for underserved communities, limitation of offshore and onshore impacts, ensure co-management and meaningful engagement with California Native American Tribes, create opportunities for socioeconomic benefits, local clean energy resilience, and energy justice through transmission planning.

The Strategic Plan is a foundational document that provides a roadmap and pathway forward to the development of offshore wind infrastructure. Due to the importance of the strategic plan, input from Tribes, stakeholders, local communities, and advocates is critical in this comment period to expand upon the recommendations and considerations addressed in the Strategic Plan.

We are pleased to submit the following comments and recommendations for the California Energy Commission’s Strategic Plan.

Further Clarification and Specificity in the Strategic Plan’s Recommendations are Necessary

The Strategic Plan’s recommendations do not provide enough detail and information on how the recommendations will be actualized. The recommendations in the Strategic Plan should expand beyond “further research and details needed.” It is important to outline which state agencies are responsible for overseeing or acting on each recommendation. Opportunities for further collaboration, coordination, and engagement with other relevant state agencies, local governments, Tribal Nations, constituencies of interest, and federal partners should be included to help provide clarity on what entity would be responsible for overseeing that recommendation.

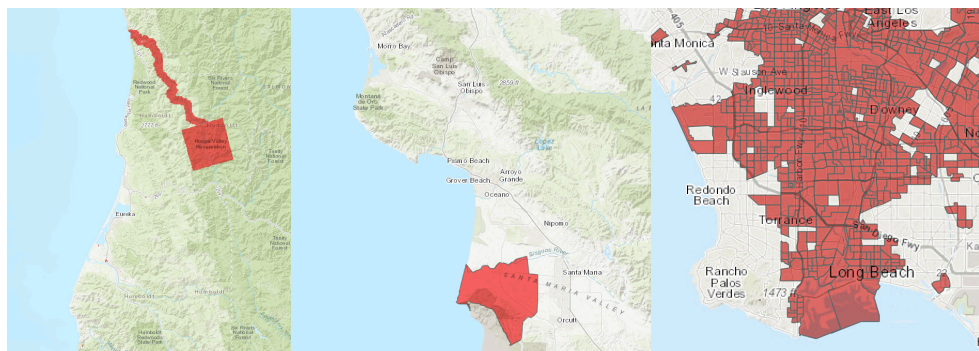
Due to the extensive planning and detail that is required to develop a renewable energy industry, a detailed report is needed to carefully outline the actions and steps that are needed to conduct the build-out of the industry. Specific and detailed recommendations in the Strategic Plan laid out earlier on in the planning process will allow for assessments, analysis, outreach, and engagement to be done right throughout the planning process. A truly strategic plan is necessary for the long-term successful and equitable implementation of offshore wind in California.

Defining Environmental Justice and Disadvantaged Communities in the Strategic Plan

We support the CEC’s efforts to expand environmental justice principles and outcomes throughout the project development process. In the draft AB 525 Strategic Plan, there is an opportunity to consider further who underserved communities are in the development of offshore wind and may be impacted by the industry’s development in California. Different Federal, State, and local mapping processes should be weighed when assessing who is considering an underserved community in California and may be impacted by offshore wind development. The CEC should weigh a variety of available maps and methodologies as well as regional maps. These available maps include but are not limited to, the California SB 535 Disadvantaged Communities Map, the federal Climate and Economic Justice Screening Tool, and the Energy Communities Mapping.

Floating offshore wind’s specific impacts on California are not yet known. Impacts to environmental justice and disadvantaged communities should consider port-side communities across the California coast as well as those near fossil fuel plants and other energy infrastructure. The following maps are included for reference but do not include all impacted communities that exist across the state, especially due to the cumulative port and transmission development needs for floating offshore wind.

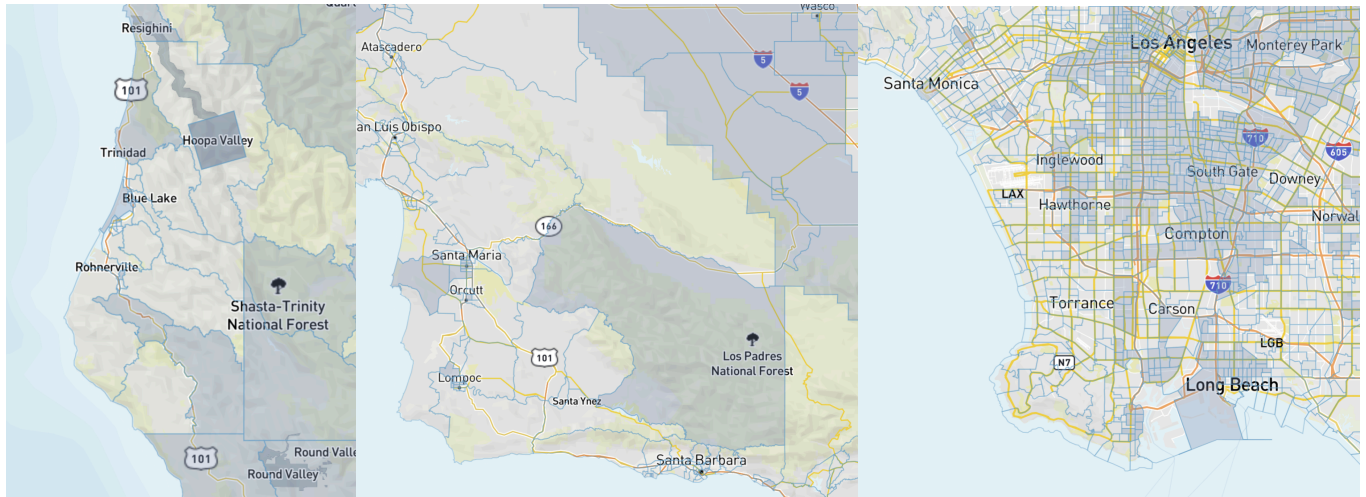
California SB 535 Disadvantaged Communities Map



SB 535 Disadvantaged Communities (red) on the North Coast (left), Central Coast (center), and Long Beach (right).¹

¹ Images taken from CalEnviroScreen 4.0 SB 535 Disadvantaged Communities Map, California Environmental Protection Agency, (May 2022) <https://oehha.ca.gov/calenviroscreen/sb535>.

Climate and Economic Justice Screening Tool (CEJST)



Communities highlighted by CEJST (blue) on California's North Coast (left), Central Coast (center), and Long Beach (right).²

Energy Communities



Communities identified as Energy Communities (purple) on California's North Coast (left), Central Coast (center), and Long Beach (right).³

Additionally, the California Public Utilities Commission'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.⁴ The usage of these state, federal, and local tools and guidance can help support a process that better reflects regional and site-specific impacts that can be informed by local community knowledge.

² Images taken from Climate and Economic Justice Screening Tool, Council on Environmental Quality, (Nov 2022), <https://screeningtool.geoplatform.gov/en/#4.29/37.69/-114.59>.

³ Images Taken from IRA Energy Communities Tax Credit Bonus Map, U.S Department of Energy, (2023), <https://arcgis.netl.doe.gov/portal/apps/experiencebuilder/experience/?id=a2ce47d4721a477a8701bd0e08495e1d>.

⁴ Final Designation of Disadvantaged Communities pursuant to Senate Bill 535, California Environmental Protection Agency, (May 2022), https://calepa.ca.gov/wp-content/uploads/sites/6/2022/05/Updated-Disadvantaged-Communities-Designation-DAC-May-2022-Eng-a.hp_1.pdf.

Further Considerations and Impacts to Community Resources and Affordability

Economic benefits are foreseen to bolster the local economies through job creation that promotes local hire and investment in workforce development and job training, especially for underserved communities. However, the development of offshore wind has the potential to harm pre-existing housing stock and social services near the wind energy areas. This can lead to a displacement. Increased activity and development in nearby port communities will put strains on communities with potential traffic, air pollution, and limited available resources. Potentially leading to displacement.

Disadvantaged Communities in California are already experiencing higher rates of racial and economic inequality and a lack of high-quality job opportunities, particularly for low-income residents and Black, Indigenous, and People of Color (BIPOC) communities. With significant historic employment in oil and nuclear energy industries in transition, and large concentrations of employment in agriculture and hospitality which are relatively low-wage and threatened by climate change. Offshore wind's impacts should be assessed on potential economic implications for local working families. In more rural and isolated areas, increased activities related to offshore wind can put stress on community resources such as access to healthcare services, roads, childcare, and other aging public infrastructure.

The following recommendations, resources, and impacts should be further considered within the Strategic Plan to minimize impacts on housing and social services:

- Conduct a population impact analysis to determine the impact the offshore wind industry workforce will have on housing, social, and medical services already existing within nearby communities of the wind lease areas.
- Implement a strategy to minimize the impacts of displacement of residents who already live in the community due to an increase in new residents impacting housing stock, housing prices, and rent.
- Increased funding for public infrastructure improvements, such as replacement of roads, broadband access, reliable and affordable clean energy projects, and more accessible transportation networks for residents.
- Expand the coordination of state agencies, such as the California Energy Commission to ensure that local communities benefit from the development of offshore wind through local clean energy resilience, local distribution from the buildout of transmission lines, and ensuring reliability and affordability from clean energy sources.

Further planning is needed by relevant state agencies to determine the amount of facilities that will be needed to be built to meet additional community needs. Attention must be given to trends in the potential displacement of local residents in the area and implement measures to mitigate any further impacts on residents already residing in nearby communities before any population increases in the region. Floating offshore wind's cumulative impacts may put significant strains on existing resources near project areas. These impacts should be further assessed with actionable steps and responsibilities outlined in the strategic plan.

Best Practices for Meaningful Engagement with Underserved and Impacted Communities

Local knowledge within offshore wind development is needed to acknowledge and learn from impacted communities' experiences on how to mitigate best and measure any potential onshore and ocean impacts. As outlined in the California Coastal Commission Consistency Determination Conditions, transparent and open communication with frontline, local, and Disadvantaged Communities is essential to the process.⁵ For too long, the construction of large-scale projects has been sited next to low-income communities of color, as well as, those who bear the brunt of the disproportionate impacts from harmful industrial practices.

Leadership from state agencies such as the California Energy Commission and Coastal Commission is needed to expand AMMM measures for a clear and meaningful community engagement process. This includes but is not limited to appropriate language interpretation and translation services, multimedia outreach to inform community members of upcoming meetings, support such as childcare or refreshments during meetings, recording and transcribing of workshops and meetings, and holding meetings at accessible times and locations. All California residents, especially those who are vulnerable to being impacted, should be able to participate by providing accessible avenues for engagement.

Other best practices and methods to consider are:

- In consultation with community-based organizations, fisheries organizations, appropriate state agencies, and other industry participants, identify potential impacts from the development of the project, especially how the identified burdens are compounded or exacerbated by project and development activities.
- The evaluation, avoidance, and mitigation of impacts should be done in concert with developers, local and disadvantaged communities, and government agencies throughout a project's lifetime.
- Measure and monitor the steps that have been taken to ensure that community concerns throughout the project phases are avoided, minimized, measured, and mitigated. Opportunities in the project implementation to invest or provide benefits to community members should be identified.
- Leadership from state agencies, such as the California Energy Commission is needed to ensure that there are avenues and available resources for capacity building for Tribes and local communities to engage within the planning and permitting process for offshore wind development.
- Trust and honesty must be principles to effectively build connections with community members to effectively address and mitigate concerns. This can include community benefits agreements (CBA), legally enforceable agreements that can promote clear outcomes, and establish approaches to meaningful engagement, and transparency.⁶

Environmental justice is a highly localized issue. Community engagement cannot be the same for the two wind lease regions nor areas of port and transmission development due to the unique needs and diversity within the communities. Therefore, a robust and distinct process is necessary for each

⁵ California Coastal Commission, *Adopted Findings of Consistency Determinations* No. CD-0001-22, (March 2022), <https://documents.coastal.ca.gov/assets/upcoming-projects/offshore-wind/Th8a-4-2022%20adopted%20findings.pdf>.

⁶ Office of Minority Business and Economic Development, *Guide to Advancing Opportunities for Community Benefits through Energy Project Development*, U.S. Department of Energy, (August 2017), <https://www.energy.gov/justice/articles/community-benefit-agreement-cba-resource-guide>.

project to truly conduct meaningful engagement. With impacted communities, honoring individuals' knowledge will help build consensus, and trust and strengthen the decision-making process. The Strategic Plans' recommendations should provide further detail on how agencies intend to increase community engagement and process to identify further avenues to expand community capacity.

Tribal Sovereignty Should be Affirmed within the Strategic Plan

Interested Native American Tribes should lead in the floating offshore wind decision-making process. In addition to consultations and meaningful engagement, Tribal decision-making authority, leadership, and knowledge should be recognized and affirmed throughout the development of offshore wind. State agencies should recognize the importance of Tribal Sovereignty and the rights Tribes have to safeguard and protect the ocean, and all natural and cultural resources from industrial development.

The Council of Environmental Quality and the Office of Science and Technology released a joint document outlining guidance on how to engage policy, research, and decision-making with Indigenous Traditional Ecological Knowledge.⁷ Going beyond being included in the decision-making process or having a “seat at the table”, government and other bureaucratic agencies can develop meaningful relationships by starting engagement early, earning trust, and creating structures to affirm Tribal Sovereignty in the process.⁸ Tribes must be brought into the decision-making process early on and engaged equitably to ensure management of ecosystems and wildlife honors their cultural and historical significance. There are a plethora of potential impacts of floating offshore wind including impediment of cultural viewsheds and resources, exacerbating rates of Murdered and Missing Indigenous Peoples (“MMIP”), and indigenous land management practices. Further measures and mitigation of any impacts to Tribes and their cultural resources conveyed by other Tribal governments, Indigenous-led organizations, and any other Tribal community members must be considered in the Strategic Plan.

Highlight California's Climate and Energy Goals within the Strategic Plan

Floating offshore wind has the potential to bring significant renewable energy benefits to California. California state agencies affirm the need for renewable energies, like offshore wind, to achieve the state's climate goals. California's SB 100 report, which charts the state's plans to achieve a 100% renewable energy system, and identifies offshore wind as an important resource.⁹ With the passing of AB 525, a planning goal was set by California to meet 25 GW of offshore wind energy generation by 2045.¹⁰ As reflected in these reports, offshore wind is a critical resource to meet California's peak energy demand while reducing the state's dependency on fossil fuels. The Strategic Plan must evaluate floating wind energy's potential benefits to slowing climate change and opportunities to help achieve state and federal renewable energy goals.

Additionally, underserved and disadvantaged communities are disproportionately impacted by climate change and oil and gas infrastructure. Frontline communities bear the greatest burdens in

⁷ Office of Science and Technology & Council or Environmental Quality, *Guidance for Federal Departments and Agencies on Indigenous Knowledge*, (November 2022), <https://www.whitehouse.gov/wp-content/uploads/2022/12/OSTP-CEQ-IK-Guidance.pdf>.

⁸ Office of Science and Technology & Council or Environmental Quality, *Guidance for Federal Departments and Agencies on Indigenous Knowledge*, (November 2022), <https://www.whitehouse.gov/wp-content/uploads/2022/12/OSTP-CEQ-IK-Guidance.pdf>.

⁹ SB 100, De León. California Renewables Portfolio Standard Program: emissions of greenhouse gasses https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100.

¹⁰ AB 525, Chiu. Energy: offshore wind generation, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB525.

the face of sea-level rise and the increased intensity and frequency of natural disasters. Developing offshore wind may help displace natural gas infrastructure in these communities.

Due to this long history of fracked gas infrastructure, such as peaker power plants in Disadvantaged Communities, the Strategic Plan should address and conduct further analysis of how offshore wind has the potential to provide a shift away from harmful gas energy generation

The development of offshore wind on the California coast can advance the State's SB 100 goals to curb greenhouse gas emissions and climate change. Furthermore, offshore wind can progress the phase-out of harmful fossil fuel infrastructure, such as gas-powered peaker plants which continue to run and produce toxic emissions impacting environmental justice communities. The avoidance, mitigation, minimization, and monitoring (AMMM) measures within the Strategic Plan should address the opportunity offshore wind provides for a transition away from fossil fuel, meeting the State's clean energy goals and acknowledging the potential harmful impacts that may present themselves on the Central and North Coasts.

Adequately Address Environmental Impacts and AMMM Measures within the Strategic Plan

The development of floating offshore wind in California has the potential to negatively impact habitats and animals that inhabit California's diverse land and seascapes. These impacts may shift due to climate change and how project construction may occur. As the installation, operations, maintenance, and decommissioning phases of an offshore wind project occur, there is a need to recognize a change in what impacts may occur over time. There is a need for early preparation through research and data collection to determine initial impacts. Impacts of concern from offshore wind development include the following and are not limited to, towing and mooring activities affecting marine mammals through ship strikes and noise, platform-related cabling activities causing secondary entanglements of fishing gear and marine species, and disruption of behavior, habitats, and population to native ecosystems. Further protections and identification of potential impacts should be studied for birds, bats, benthic habitats, marine mammals, fish, and turtles.

The cumulative impacts of floating offshore wind need to be assessed to determine what appropriate measures should be undertaken to address the larger impacts on onshore and offshore ecological systems. The following AMMM measures should be considered for the California PEIS:

- Support the creation of a West Coast Science Entity.
- Total evaluation of the effects of development throughout the lifetime of the projects (site assessments, construction, operations and maintenance, and decommissioning) on all of the wind lease areas in California.
- Indicate how the minimization of noise impacts above and underwater will be limited during the project. Efforts to detail any noise activities taking place during the installation, operations, and maintenance of the project and highlight actions for noise reduction to the fullest extent possible.
- Reduce the risk of secondary entanglement for seabirds and marine species from mooring lines and cables. Measures for mitigation include considerations for installation arrangements that limit entanglements and continuous inspections of the lines and cables.
- The protection of benthic habitats should include conducting surveys to identify any potential disturbances to these habitats and species that populate the area.

- Further research and data collection should be conducted to discern the correlation between offshore wind development and upwelling impacts on marine environments and species.
- The use of collaborative efforts and meaningful engagement with all ocean co-users who have lived experiences and subject expertise on matters related to impacts on fish, marine mammals, migratory birds, plants, and any species of cultural importance.

Adaptive management will be a key component for AMMM measures through the ability to monitor and evaluate wildlife and habitats with adaptive decision-making to allow for changes in monitoring moving forward with responses to behavior, habitat alterations, changes in migratory patterns, and health.¹¹ Using cultural, and traditional ecological knowledge, and local knowledge holders will be important to define and determine where mitigation and management may be necessary. Increased use of data transparency and the co-creation of adaptive monitoring and management plans with Tribal and local knowledge holders can help strengthen any monitoring measures. A robust steering committee should be developed to decipher and discern the best use of scientific strategies and guidance moving forward to limit any further impacts on local communities. Measures to avoid impacts to ecosystems and local communities are of the most importance and should begin early on in the offshore wind development process to consider the significance of each impact and how to appropriately respond.

Further Community Engagement and Data Collection is Needed to Identify Suitable Sea Space

As the State and federal agencies begin to determine where future development areas will take place along the California coast, more transparent and open dialogue to identify conflict-use areas will need to be considered. Potentially suitable sea space areas have been identified within Mendocino and Del Norte Counties. However, further research and data analysis are needed to identify what impacts onshore and offshore may exist with the development of offshore wind in these areas.

The Strategic Plan should provide additional clarity on current research and data collection efforts occurring to identify suitable sea space and the process for determination of that space. For example, consideration should be given to conflict areas that may impact fish, migratory birds, salmon, marine mammals, turtles, and other marine species.

As federal agencies begin to move further into the destination process and areas become formally designated as offshore wind energy areas, then State leadership and state agencies must help manage and steward a robust environmental review process that measures impacts to all conflict use areas. Throughout this review process, local communities and ocean co-users must be meaningfully engaged to identify areas of concern. The Strategic Plan must recognize and further address the importance of meaningful engagement with local communities and Tribes to incorporate and identify areas of concern within the proposed suitable sea space areas.

¹¹ Deepwater Horizon (DWH) Natural Resource Damage Assessment Trustees, *Monitoring and Adaptive Management Procedures and Guidelines Manual Version 2.0*, Appendix to the Trustee Council Standard Operating Procedures for Implementation of the Natural Resource Restoration for the DWH Oil Spill, (December 2021), <https://www.gulfspillrestoration.noaa.gov/media/document/2021-12-tc-monitoring-and-adaptive-management-procedures-and-guidelines-manual>.

Port Impacts Should be Measured throughout the Lifetime of a Project

A significant buildout of infrastructure and expansion of ports is required to accommodate the offshore wind projects in California. Port development can potentially bring significant cumulative impacts on the local communities and environment. The construction of piers and dredging within harbors can lead to harmful environmental impacts on marine mammals, fish, birds, and native plants. Furthermore, increased port activities and development could negatively impact near-port communities — where a legacy of harm and pollution has already taken place.

According to the AB 525 Port Readiness Plan, the maximum case scenario for offshore wind is that almost all sea ports in California will undergo significant port development due to the lack of infrastructure in place for offshore wind.¹² This port development will increase overall activity at all ports to support siting and integration, operations, and other offshore wind-related activities. Such activities include dredging, land expansion, transitioning equipment to zero-emissions, and other forms of construction that will ready port operations for offshore wind development. Current emphasis is put on electrifying ports to become zero emissions to limit further air quality and noise impacts to nearby port communities. Although port development is not guaranteed to use the best available technologies to build zero-emission ports, gas-powered machinery, and transportation, leadership is needed from state agencies to push for policies and funds that prioritize green port infrastructure. Continued efforts to monitor impacts will be needed throughout the entirety of the project's lifespan to protect public health and avoid onshore impacts.

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 machinery, and construction-related equipment could all increase air pollution in these adjacent communities. Increased exposure to air pollutants can lead to exacerbated health impacts in environmental justice communities.

A 2022 study found that concentrations of total fine particulate matter are two times higher in disadvantaged and Black, Indigenous, and People Of Color (“BIPOC”) communities in the United States and, further, concentrations of metals from anthropogenic sources are nearly 10 times higher in those areas.¹³ The study also found that these disproportionate exposures may be reduced through targeted regulatory action (e.g., regulations on the sulfur content of marine fuel oil). Maternal exposure to fine and ultrafine particulate matter has been found to have lasting effects on children's health, including low birth weight, respiratory issues, and immune system problems.¹⁴ Ultimately, adverse health impacts can lead to compounding stressors on the nearby residents. Moreover, as Brightline has seen in the San Francisco Bay Area, historically underserved communities near ports are likely to be unable to afford mitigation measures including expensive air filtration and personal protection gear.

Appropriate AMMM measures to address the adverse air quality impacts of offshore wind infrastructure and port development include:

- Require zero-emissions equipment at ports including electric drayage trucks.

¹² Jennifer Lim and Matthew Trowbridge, AB 525 Port Readiness Plan, California State Lands Commission, AB 525 Port Readiness Plan, (July 2023), https://slcprdwordpressstorage.blob.core.windows.net/wordpressdata/2023/07/AB525-Port-Readiness-Plan_acc.pdf.

¹³ John K. Kodros, Michelle L. Bell, Francesca Dominici, Christian L'Orange, Krystal J. Godri Pollitt, Scott Weichenthal, Xiao Wu, and John Volckens, *Unequal airborne exposure to toxic metals associated with race, ethnicity, and segregation in the USA*, Nature Communications, (November 2022), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9626599/pdf/41467_2022_Article_33372.pdf.

¹⁴ Ibid.

- Conduct site assessments and survey analyses that monitor impacts from air quality and any potentially harmful pollutants to limit or negate these impacts to the fullest extent possible for communities near transit corridors and the port.
- Installation of air quality monitoring systems that give public access to real time data analysis. The monitoring devices should be installed in the ports and nearby communities.
- Include a detailed communications plan that outlines addressing appropriate communication methods, guidelines for sending out notices of when construction activities will take place, and any further best practices for continued community engagement throughout the lifespan of the project.
- Ensure protections for environmental justice communities from any noise and air quality impacts by providing households near development with supplies to mitigate impacts, such as air filters.

Further research and analysis on port development is necessary throughout the lifetime of the projects to determine how to best circumvent impacts over time. The Strategic Plan must address and consider what are the impacts to surrounding port communities, and what specific measures will be implemented to avoid foreseen and unintended impacts.

Identifying Opportunities to Develop a Strong Local Workforce in the Strategic Plan

The Strategic Plan can be strengthened by identifying specific and clear pathways for how offshore wind can be a catalyst for building transformational workforce development pathways.

The following policy considerations and opportunities are included for further consideration:

- Inclusion of project labor agreements (PLAs) to support regional and local unionized labor and bolster training, and employment benefit opportunities for local community members. The use of Local and Targeted Hiring practices, including Tribal Hiring, can create long-term sustainable career pathways for local underemployed, hard-to-reach, and unemployed communities, especially when coupled with mandatory minimum percentage requirements, apprenticeships, and training programs.
- Funding and supporting pre-apprenticeship programs with local academic institutions and/or job training service providers
- Investment in pre-existing local programs to help build capacity with these institutions and public programs that support Tribal members, students of color, and low-income students entering the workforce in high-road careers. This includes training, educational, and leadership opportunities in science, technology, engineering, math (STEM), and sciences focused on the foundations of traditional ecological knowledge.
- Bolster strong local economies by prioritizing Tribal and BIPOC-owned businesses involved in supply chain materials, contracting, and other procurement-focused businesses in offshore wind development.
- Further discussion on workforce development and job opportunities should include the consideration of other jobs such as environmental monitoring and management.

These pathways are critical to nurturing the local workforce necessary to build offshore wind projects. Workforce development is key in providing support to the rural and coastal local economies where the wind lease areas are located and potentially mitigating offshore wind impacts.

Energy Justice Must be a Throughline Within the Transmission Planning Process

Transmission line connectivity and resilience are key to furthering California's SB 100 renewable energy goals. A proactive process of multi-agency coordination is necessary to meet floating offshore wind transmission needs. The Strategic Plan stated considerable planning efforts will need to be made to the current energy grid for new transmission line connectivity.¹⁵ Particularly in Northern California, studies have shown that the current transmission lines are already limited and especially lack the current capacity that is needed for offshore wind development.¹⁶ Transmission planning is a long and arduous process, but there is an opportunity now to conduct proactive planning. The Strategic Plan should consider how energy communities can receive benefits such as local distribution, energy resilience, and affordability as this process moves forward.

The CEC should further consider and highlight the following within the Strategic Plan:

- Programmatic planning of transmission should be considered and included in the Strategic Plan. The programmatic planning of transmission provides opportunities to improve a collective understanding of transmission needs, better assess existing transmission pathways, and balance local distribution needs.
- Cite alternative design scenarios that map out opportunities for limited impacts on nearby communities and the environment. Inclusion of design scenarios and plants that discuss landfall impacts.
- Opportunities for the resiliency of transmission lines should be considered in efforts to harden the grid's infrastructure due to continued increased impacts from climate change, such as wildfires.
- Outline potential impacts to different transmission lines, pathways, and landfalls, and impact areas such as Humboldt Bay, San Francisco Bay Area, Diablo Canyon, and Morro Bay.
- Further assurance for local clean energy connectivity, capacity, and resilience for the North Coast and Central Coast regions by investing in local distribution while balancing other potential concerns such as land use and eminent domain.
- Existing programs and investments in additional new local clean energy generation.
- Prioritizing clean energy generation that is locally distributed, reliable, and affordable for local communities and Tribal nations.

With long lead times, transmission landfall impacts and siting are important factors for the Strategic Plan to assess and consider now to create a clear pathway forward for transmission planning processes.

¹⁵ Travis Douville, Mark Sevrey, Jason Eisdorfer, Li He, and Bryan Pamintuan, *West Coast Offshore Wind Transmission Literature Review and Gaps Analysis*, U.S. Department of Energy's Office of Energy Efficiency and Renewable Energy, (February 2023), https://www.pnnl.gov/sites/default/files/media/file/West_Coast_OSW_Tx_Literature_Review_PNNL_WETO_021623_0.pdf.

¹⁶ *Ibid.*

Further Clarity on the Ocean REAT and REGP is Necessary for a Robust Permitting Process

The permitting process for offshore wind involves multiple agencies, especially at the state and local levels. A more coordinated approach between agencies is needed for a robust permitting process to take place.

The following comments should be considered for offshore wind permitting:

- The Strategic Plan should clearly define the roles and responsibilities of all agencies including clarifying regulatory authorities and powers
- The Ocean REAT and REGP permitting process should provide clearer opportunities for public input and engagement including the sequencing of permitting steps.
- Include lessons learned from past infrastructure projects that required coordination from multiple state and federal agencies as opportunities to further improve upon in constructing offshore wind projects.
- The permitting process should prioritize opportunities to increase the use of green port infrastructure and other zero-emissions equipment in the construction and operations plans.
- A “streamlined permitting process” should not come at the expense of communities and the environment. The permitting process must consider impacts onshore and offshore to local communities, Tribes, and marine and cultural resources within the permitting process.
- Further discussion on how Ocean REAT and REGP will coordinate with states such as Oregon and Washington on offshore wind and related transmission. California’s engagement in the Western Energy Imbalance Market and other Western states’ energy processes may impact offshore wind development.

Conclusion

We appreciate the opportunity to comment and provide recommendations for the Strategic Plan. This plan must provide a clear set of recommendations and guidelines that identify a pathway forward for the responsible development of offshore wind in California. There must be measures to protect, mitigate, and minimize any harmful impacts to communities, especially those who are most vulnerable and the diverse ecosystems and marine species that inhabit our coastlines. Offshore wind can be key to a clean energy future but must be done in a way that protects the environment, and communities, and provides considerable socioeconomic benefits to rural and coastal communities in which the projects will be taking place.

Sincerely,



Eddie Ahn, Executive Director

Brightline Defense Project