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Redwood Region Partner Comments on the Draft AB 525 Offshore Wind Strategic Plan

On behalf of the undersigned partners and representatives of the North Coast Offshore Wind Community Benefits Network (Network), we respectfully submit the attached comments on the Draft AB 525 Offshore Wind Strategic Plan (Strategic Plan): Blue Lake Rancheria, Changing Tides Family Services, Cher-Ae Heights Indian Community of the Trinidad Rancheria, College of the Redwoods, Elk Valley Rancheria, Environmental Protection Information Center, Hoopa Valley Tribe, Humboldt County Association of Governments, Peninsula Community Services District, and Redwood Region Climate and Community Resilience Hub.

Additional submitted attachment is included below.



April 22, 2024

California Energy Commission
Docket Unit, MS-4
Docket No. 17-MISC-01
715 P Street
Sacramento, CA 95814

Submitted via electronic mail to doCKET@energy.ca.gov.

RE: Redwood Region Partner Comments on the AB 525 Offshore Wind Strategic Plan

Dear Chair Hochschild and Commissioners,

On behalf of the undersigned partners and representatives of the North Coast Offshore Wind Community Benefits Network (Network)¹, we respectfully submit the following comments on the Draft AB 525 Offshore Wind Strategic Plan (Strategic Plan): Blue Lake Rancheria, Changing Tides Family Services, Cher-Ae Heights Indian Community of the Trinidad Rancheria, College of the Redwoods, Elk Valley Rancheria, Environmental Protection Information Center, Hoopa Valley Tribe, Humboldt County Association of Governments, Peninsula Community Services District, and Redwood Region Climate and Community Resilience Hub.

The Draft Strategic Plan is a critical tool outlining the path forward for offshore wind development in California, as part of the state's efforts to fight climate change and proactively shape the industry into a model that safeguards our environment, protects cultural resources, promotes long-term community investments and ensures community safety and agency, reinforces Tribal sovereignty, creates high-road careers, and strengthens partnerships with local communities, Tribal Nations, state, and federal agencies. We appreciate the extensive efforts that CEC and collaborating agencies invested in drafting the Strategic Plan and are pleased to see that the Draft Strategic Plan has incorporated previous comments and priorities raised by leaders across sectors and regions.

¹ The North Coast Offshore Wind Community Benefits Network and related working groups is a diverse network of Tribal Nations, local government agencies and educational institutions, labor leaders, local community-based organizations, and community residents. The Network is convened by the Redwood Region Climate and Community Resilience Hub, based at the Humboldt Area and Wild Rivers Community Foundation.

We believe that a community-centered strategic plan, backed by clear inter-agency coordination, is key to the successful development and deployment of offshore wind. The Strategic Plan must establish clear processes and recommendations that are responsive to Tribal, statewide, and region-specific concerns, interests and needs, including strong community, cultural, economic, and environmental guardrails and investments, and thorough analysis, design, avoidance, and mitigation.

I. Context

As a community deeply connected to and dependent on the natural world, we are profoundly concerned about the impacts of climate change, both globally, regionally, and in Wigi/Humboldt Bay and our local coastlines. We recognize that our region's dependence on natural gas and propane for our energy needs comes at great costs to BIPOC and low-income communities across the country. We also recognize that this natural-gas dependency has resulted in energy insecurity and socio-economic vulnerabilities here on the North Coast. As a result, we support urgent and immediate action to decarbonize our economy and act on climate change.

Offshore wind development presents a unique opportunity to address climate change while simultaneously changing the way energy projects have historically occurred. In the past, state and federal governments frequently partnered with industry to steamroll Tribal sovereignty and local agency/consent. The proposed development has the potential to alter the status quo of energy development by centering Tribal interests and community needs through a new era of strong policy and enforcement mechanisms. Positive change can be further supported through the creation of high-road localized career opportunities and implementing legally bound investments into our communities to help them thrive.

The North Coast region has endured devastating boom-and-bust cycles associated with extractive industries like mining, logging, cannabis and energy production developments such as dams. These industries exploited natural resources and people to primarily benefit those outside our region, resulting in significant environmental damage, violence, a legacy of underinvestment, and unfulfilled promises of restoration. Local Tribal Nations experienced land theft and state-sanctioned genocide and continue to face some of the highest rates of Missing and Murdered Indigenous Peoples (MMIP) in the US. Today, our communities face challenges from a lack of capacity, infrastructure, and community services, exacerbated by chronic underinvestment. These needs are deeply felt across our region. This is why it is imperative that offshore wind is developed in collaboration with Tribal Nations and the community to ensure that urgently needed climate action and renewable energy are done in a manner that benefits and uplifts the region from the beginning.

II. General Comments

With the development of any new large-scale energy industry, there will be direct environmental, socio-economic and cultural impacts experienced by our communities. We provide the following general comments on the Strategic Plan, urging the California Energy Commission (CEC) to consider incorporating additional guidance and establishing guardrails for offshore wind developments and associated infrastructures.

A. The Strategic Plan should incorporate clear timelines and respective lead agencies.

The Draft Strategic Plan presents a compelling vision, with promising concepts for the effective development and deployment of offshore wind across the State. To capture the innovative ideas into actionable next steps, an additional layer of specificity that clearly defines the responsibilities of respective agencies, along with established timelines for the execution of tasks, is crucial. Moreover, the Strategic Plan can also serve as a guide for interagency coordination in establishing the offshore wind industry. The additional specificities can provide the clarity and accountability necessary for successful collaboration.

B. Tribal Sovereignty should be a central tenet of the Strategic Plan.

Offshore wind development must respect and meaningfully center Tribal sovereignty, leadership, expertise, responsibilities, interests, and experiences to ensure that Tribal science, traditional knowledge, and cultural practices lead to development in which our unique ecosystems are protected and root causes of climate change are addressed. Throughout its analysis and recommendations, the AB 525 Strategic Plan for offshore wind development must respect and honor Tribes' fundamental rights as sovereign nations, ensure the federal government fulfills its trust responsibility, have early and frequent government-to-government consultation, include enabling contracts and agreements, and require other legally binding mechanisms for co-management and co-ownership.

Tribes have held stewardship and deep relationships with the ocean, marine species, coastal shores, and lands since time immemorial. These relationships have withstood state-sanctioned genocide and land theft through unratified treaties and federal legislation² that have left Tribal members landless and without access to traditional ceremony, harvesting, and gathering areas.³ On the North Coast alone, the area that will be impacted by offshore wind development includes the Tribal lands and waters of the Bear River Band of the Rohnerville Rancheria, Big Lagoon Rancheria, Blue Lake Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, Elk Valley Rancheria, Hoopa Valley Tribe, Karuk Tribe, Nor Rel Muk Wintu Nation, Resighini Rancheria, Tolowa Dee-ni' Nation, Tsungwe Tribe, Wiyot Tribe, and Yurok Tribe; and Public Domain Allotments (allotments outside the bounds of Indian Reservations).

Even with the lack of treaties and the presumed extinguishment of aboriginal title,⁴ California has acknowledged North Coast California Tribes' reserved off-reservation rights in its intergovernmental relations with the implementation of the Marine Life Protection Act (MLPA). Since then, Assembly Bill No. 52 (AB 52) amended the California Environmental Quality Act (CEQA) in 2014 to mandate early tribal consultation during the CEQA review process to position California Native American

² <https://nahc.ca.gov/native-americans/california-indian-history/> (visited March 18, 2024)

³ Curtis G. Berkey & Scot W. Williams, California Indian Tribes and the Marine Life Protection Act: The Seeds of a Partnership to Preserve Natural Resources, 43 Am. Indian L. Rev. 307, at 312 (2019) (citing Les. W. Field, Complicities and Collaborations: Anthropologists and the "Unacknowledged Tribes" of California, 40 Current Anthropology 193, note 17, at 313) (Congress passed the California Private Lands Act in 1851, See Act of Mar. 3, 1851, ch. 41, 9 Stat. 631.)

⁴ See Bruce S. Flushman & Joe Barbieri, Aboriginal Title: The Special Case of California, 17 Pac. L. J. 391 (1986).

tribes as the experts on cultural resources within their own geographical areas, including off-reservation aboriginal territories.

Simultaneously, the past decade has seen an expanded understanding on an international level of the need to address the historic legacy of long-standing malpractice in resource extraction and its effects on Indigenous communities.⁵ Nevertheless, the growing practice of obtaining Free, Prior, and Informed Consent (FPIC) before approving large infrastructure projects on indigenous lands (on or off-reservation lands) has yet to be established in the United States.

We are now in a new era and presented with major development impacts related to offshore wind energy. This extends an opportunity for the state of California to lead the way in improving its relationship with Indigenous peoples by recognizing their rights to off-reservation aboriginal territories impacted by renewable energy development and working towards more robust government-to-government relations that incorporate values of FPIC. We see this as not only critical to respecting tribal sovereignty, but necessary to address climate change in a timely fashion.

We underscore the need to go beyond offering Tribes a ‘seat at the table’ and enact true co-leadership and decision-making structures with full and fair disclosure free of coercion and limitations of sovereignty.

The AB 525 Strategic Plan for Offshore Wind Development should provide guidance to codify Tribal Nations’ decision-making authority throughout offshore wind project components:

- Review and propose pathways to achieve regulatory authority, co-management and co-ownership for Tribal Nations, including a related set of proposed agreements.
- Propose intergovernmental agreements between regulating California agencies, Tribes, and/or a consortium Tribal body supported by Tribal governments, to defer or share regulatory and management responsibilities.
- Propose flexible and ongoing capacity funding for Tribal Nations for involvement in offshore wind planning, assessment, and potential implementation processes.
- Review, analyze and propose potential amendments to controlling bodies of law by the California legislature to provide for specific recognition of interests of Tribal Nations.

⁵ See e.g., Tara Ward, *The Right to Free, Prior, and Informed Consent: Indigenous Peoples' Participation Rights within International Law*, 10 *Nw. J. Int'l Hum. Rts.* 54 (2011).

- Review, analyze and propose potential controlling regulatory law by California agencies for provisions with broad enough authority to define more specific recognition of Tribal interests.

C. The Strategic Plan should uplift Tribal Agreements as one effective set of tools in securing co-management authority, protections, investments and benefits for Tribal Nations.

Tribal agreements can be developed with one or many Tribal Nations. Agreements must recognize Tribal sovereignty and interests affected by related projects; be directly negotiated with Tribal Nations; provide capacity for participating Tribal Nation(s), their communities or members; describe protections and benefits; codify commitment to free, prior and informed consent; and include strong mechanisms for enforcement and accountability. Tribal agreements provide mechanisms for development and operational commitments, investment, coordination, revenue sharing, joint ventures, other forms of socioeconomic participation, co-management, and more. We recommend that the Strategic Plan include a clear guideline and pathways for Tribal agreements.

D. The Strategic Plan must commit to greater transparency and procedural justice.

The Strategic Plan's recommendations should provide greater clarity on process and commit to ensuring procedural justice for Tribal Nations and communities facing energy injustice, access barriers and direct project impacts. Each recommendation should include responsible state agencies, and opportunities for further collaboration, coordination, leadership, decision making, and engagement with relevant state agencies, local governments, Tribal Nations, constituencies of interest, and federal partners. The Strategic Plan should also lay out practices for data collection collaboration and transparency, including regular and consistent reporting and public data sharing, which enables communities and Tribes to stay informed throughout offshore wind development, operations and decommissioning processes.

E. The Strategic Plan should champion investment in energy infrastructure with a strong focus on impacted communities.

The Strategic Plan must adopt the framing that offshore wind development must deliver local community protections, investments and benefits. Offshore wind development on the North Coast is planned to provide 5-16 GW of renewable power, playing a critical role in meeting the state's 25 GW offshore wind goals. Because this massive development will disproportionately impact local ecosystems and communities, significant investments in our renewable energy future must prioritize the interests and concerns of impacted communities through legally binding and enforceable agreements.

F. The Strategic Plan should uplift Community Agreements as one effective tool in securing tangible and equitable benefits and protections for local communities.

We appreciate the Strategic Plan's discussion of Community Benefits Agreements (CBAs) as vehicles to advance workforce and economic benefits. Yet, we emphasize that the scope of community benefits extends beyond economic growth and workforce. As the California Coastal Commission (CCC) states in Condition #5 of the agency's conditional

concurrence with the Bureau of Ocean Energy Management (BOEM)'s consistency determination in April 2022, the developers are strongly encouraged to work with the community to "co-develop a community benefits package to ensure that communities of concern receive benefits from offshore wind."⁶ Condition #5 further encourages collaboration with communities to create community benefits that are effective and supportive, ensuring equitable support for low-income families and individuals in a way that aligns with the community's needs. Moreover, BOEM, in the 2022 Pacific Wind Lease Sale 1 Final Sales Notice, also required CBAs to reflect "the diverse interests and inclusive needs of more than one impacted community."⁷

Offshore wind and supporting infrastructure present multiple opportunities for community agreements across different stages of development. Such agreements can be incorporated in any mechanism that advances or approves the project in some way, such as a power purchase agreement, central procurement, a permit, a lease, or even a Request for Proposals through the bidding and evaluation process. Establishing a clear guideline for community agreements creates the critical path forward for impacted communities to secure protections, investments and benefits responsive to their unique needs and interests. Building on the existing definition in the Strategic Plan⁸ as well as federal and state agencies' recommendations regarding CBAs, we urge the Strategic Plan to incorporate the following elements:

- **An effective CBA begins with inclusive community engagement practices.** The Strategic Plan should recommend developers to adopt best practices in ensuring full inclusiveness and accessibility. Such practices include utilizing minimum technical terms in communication materials, ensuring materials available in multiple most spoken languages within our communities, and incorporating visuals and being culturally sensitive to the diverse backgrounds of North Coast communities are also crucial strategies. Moreover, creating multiple avenues for feedback, beyond traditional methods, will encourage broader community involvement.
- **Communities must lead the design of the community agreements package.** A successful community agreement is driven by communities and is responsive to their specific needs and interests. This involves forming a coalition that includes both local subject matter experts from various sectors and community members who bring their personal experiences, reflecting the real needs of the community. By embedding the terms of the community agreement into legally enforceable frameworks, such as leases or formal community benefits agreements, these coalitions are able to establish a set of binding terms. This approach ensures the delivery of concrete protections and benefits for the community, including investments in community services and infrastructure needs.

⁶ California Coastal Commission. March 17, 2022. Conditional Concurrence: Adopted Findings. Accessed April 2024 from <https://documents.coastal.ca.gov/assets/upcoming-projects/offshore-wind/Th8a-4-2022%20adopted%20findings.pdf>.

⁷ Bureau of Ocean Energy Management. October 21, 2022. Pacific Wind Lease Sale 1 (PACW-1) for Commercial Leasing for Wind Power on the Outer Continental Shelf in California—Final Sale Notice. <https://www.govinfo.gov/content/pkg/FR-2022-10-21/pdf/2022-22871.pdf>

⁸ California Energy Commission. January 19, 2024. Assembly Bill 525 Offshore Wind Strategic Plan Volume II: Main Report. Pg. 175

- **Lasting funding and resources are essential to growing community capacity.**
To ensure the longevity of an effective community agreement, it is imperative that the agreement specifies dedicated funds or mechanisms for financing the costs associated with participation, including sharing of expertise, time, transportation, childcare, and translation services, throughout its duration. A viable strategy could involve establishing a community benefits fund, where a portion of the fund is allocated at the community agreement’s inception and additional funds are contributed as the project progresses, or through rents and other payments received. The allocation and use of these funds would be overseen by a community-led body, operating within a framework of topics or guidelines laid out by the coalition and vetted by the communities during the design of the agreement terms.
- **Community governance is key to upholding commitments over time.**
Embedding a community governance element in a community agreement, such as a Community Steering Committee comprised of subject matter experts, residents with lived experience, Tribal representatives, and local agency representatives, is key to the long-term success of a community agreement. Such community enforcement elements provide a mechanism for community and coalition participants to directly enforce the terms of the agreement and grow their ownership in the life and success of the project.
- **Community agreements must not supplant environmental review or other mechanisms to ensure protections and investments.**
The environmental review and permitting process are an important component of an effective community agreement, as it is through these processes that communities learn about the potential benefits and impacts that can inform the development of a strong community agreement that is responsive to the needs of the community. Moreover, all avoidance, minimization, and mitigation measures must be required to be addressed, as a community agreement is in addition to, not in lieu of, these measures. A strong and successful community agreement centers community leadership and decision-making, and the framework is based on the unique needs of the community, and therefore is not restricted to addressing potential impacts.

Additionally, community agreements must not be the only mechanisms used to ensure community protections and investments. It is critical to design a multipronged approach where community interests and concerns are woven into public policy, funding, permitting, leases, and various legally binding and enforceable agreements.

G. The Strategic Plan must address decommissioning of offshore wind infrastructure in greater detail.⁹ We are in agreement with the Natural Resources Defense Council and their environmental organization partners that “safe, reliable and environmentally sensitive decommissioning plans are an essential part of the planning process and cannot

⁹ Colleagues at the Natural Resources Defense Council (NRDC) and their environmental organization partners have prepared and submitted to the CEC an excellent comment letter on the draft Strategic Plan. Here, item F includes content from their letter, with permission.

be left for a future time. With a design life of 25 years at best,¹⁰ there is a need to plan ahead and be prepared for unexpected circumstances, including natural disasters and unexpected closures.” A 2020 study of offshore wind decommissioning practices found that plans need greater levels of specificity as they are generally comprised of “...vague promises to do whatever others are doing”; that decommissioning has been significantly undercosted; and that plans need to include greater commitments to and practices of recycling and reuse of materials.¹¹ We recommend the Strategic Plan articulate a process for developing decommissioning plans, with an associated timeline and requirements to be addressed, including gaps in end of life management infrastructure and technology and how the industry would address those limitations, as well as more accurate future cost accounting and related financing frameworks.

H. The Strategic Plan should provide greater analysis on how offshore wind will mitigate climate change and advance environmental justice. While offshore wind is a potential solution for meeting some of the state’s renewable energy and climate goals, it comes with significant risks. It would be prudent for the Strategic Plan to describe anticipated climate benefits of offshore wind, especially on issues such as sea-level rise, ocean warming and acidification, shifts in migration patterns of marine mammals and seabirds, and other impacts to marine life. Additionally, the plan should describe anticipated environmental and energy justice benefits of offshore wind.

III. Chapter-Specific Comments

Guided by our overarching general comments above, the following section provides chapter-specific comments and recommendations.

Chapter 4: The Strategic Plan Should Recommend Practices to Ensure Procedural Justice in a Comprehensive & Broad Assessment of Avoidance, Mitigation, Minimization, and Monitoring (AMMM) Measures for Offshore Wind Development.

The AB 525 Strategic Plan’s existing recommendations for AMMM measures and adaptive management are crucial to update strategies as impacts, procedures, and approaches change over time. However, in addition, the Plan should include recommendations and best practices to ensure procedural equity in implementation of AMMM measures and adaptive management. To assess the priorities and risks associated with the AMMM measures, it is imperative that offshore wind projects undergo full California Environmental Quality Act (CEQA) and the National Environmental Quality Act (NEPA) environmental review processes, ensuring leadership and co-management by Tribal Nations. In its recommendations, the Plan should include a process for co-management, consultation, capacity support, and convenings with Tribal Nations, to incorporate traditional ecological knowledge, direction, and expertise from Tribal Nations and Indigenous cultural leaders, together with other rigorous science and local scientific leaders. The CEC should consider the joint document published by the Council of Environmental Quality and the Office of Science and Technology outlining guidance on how to engage policy, research, and decision-

¹⁰ Page 163, Volume II

¹¹ Jensen, Paul D.; Purnell, Phil; Velenturf, Anne P.M. “Highlighting the need to embed circular economy in low carbon infrastructure decommissioning: The case of offshore wind.” *Sustainable Production and Consumption*, 24, 2020, pp. 266-280.

making with Indigenous Traditional Ecological Knowledge (TEK).¹² Likewise, to leverage local expertise, the Strategic Plan should recommend best practices for conducting stakeholder engagement with underserved communities, fisheries and aquaculture.

The AB 525 Strategic Plan should include a broad assessment of AMMM measures. It should consider cumulative impacts from currently proposed offshore wind areas in Northern California and Southern Oregon. We need the plan to further elaborate on impacts and resourcing in the repowering and decommissioning phases, and other long-term impacts to occur over the decades-long processes of offshore wind development. In particular, we support the recommendation that the CEC develop a comprehensive mitigation framework that prioritizes avoidance, and that adaptive management strategies should be identified to aid in rapidly responding to unanticipated impacts. We also agree and appreciate the Strategic Plan's acknowledgement that the impacts of the development likely go beyond specific sites, and the inclusion of measures to address this.

Below, we highlight a few key AMMM measures uplifted by communities in the Redwood Region. A detailed discussion of Tribal, biological, and other community impacts in the North Coast from community fora can be found in our group's Programmatic Environmental Impact Statement (PEIS) comment letter.¹³

A. Addressing AMMM Measures for Tribal Cultural Resources

We emphasize environmental review processes and AMMM measure management must incorporate TEK, cultural practices, and co-management structures with Tribal Nations and local Tribal and Indigenous scientists and cultural practitioners. Tribal cultural practices and resources across the state are vulnerable to offshore wind development impacts – in the North Coast, where the Wiyot Tribe's decades-long fight has won rematriation of Tuluwat Island in Wigi (Humboldt Bay), their hard-won fight for this ancestral land and its cultural resources is at stake with potential impacts of port development. We advocate for strengthened recommendations within the Strategic Plan that offer clear and specific avenues for AMMM measures to be informed by Tribal and cultural leaders and TEK. We propose the following for inclusion in Strategic Plan AMMM measures and recommendations:

- Uphold Tribal Sovereignty by having Tribes in positions of decision-making authority and shared regulatory authority (See Section II.B.).
- Include other avenues to work in formal partnership with regional Tribes to assess Tribal cultural resource impacts, including identifying areas with highly sensitive cultural resources and requiring developers and those with jurisdictional authority to avoid or minimize impacts to these sites. This includes the incorporation of TEK within AMMM measures, hiring staff from Tribal Nations in data design, collection and environmental

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

¹³ Joint Comment Letter on Notice of Intent to Prepare a Programmatic Environmental Impact Statement (PEIS) for Future Floating Wind Energy Development Related to 2023 Leased Areas Offshore California. February 20, 2024. <https://www.regulations.gov/comment/BOEM-2023-0061-0172>

analysis processes, and requiring co-management agreements and Tribal participation in offshore wind science and adaptive management entities and committees.

- Include a recommendation in the Strategic Plan to establish formal agreements between the future offshore wind facility developers, Wind Terminal developers, transmission developers, regulating agencies, and regional Tribes to ensure critical protection of the environment and Tribal cultural resources. In the North Coast, such agreements are necessary given the cultural significance of lands and waters where offshore wind industry cluster infrastructure would be built, operated and decommissioned. If the State is to ensure it does not interfere with the federal government upholding its trust obligations and commitment to Tribal sovereignty, the Strategic Plan must include an analysis of and recommendation for these types of agreements.
- There must be inadvertent discovery protocols in place at every instance of ground disturbance. These include direct communication with Tribes in the event of an unanticipated discovery, as well as a post-discovery process for evaluation of a discovery. The California Coastal Commission's staff report¹⁴ on the BOEM offshore lease process includes Tribal Consultation¹⁵ processes for these scenarios and can be used as a resource.
- Acknowledge and respect the previously established co-management agreements that Tribes have with State and Federal Agencies for environmental and cultural resource management.
- Acknowledge and respect Tribal protected area designations, including the Yurok-Tolowa Dee-ni' Indigenous Marine Stewardship Area (IMSA) – the first-ever ocean protection area designated by Tribal governments in the United States.
- Identify and facilitate funding (including but not limited to capacity funds from developers and the State) for gaps that are constricting Tribal leadership, participation, programmatic development, and capacity, including free prior and informed consent.

Recommendations in the Strategic Plan must form clear pathways forward for better coordination between federal and state agencies to leverage their respective resources and programs to support protection measures for Tribal cultural resources. Specific opportunities may include:

- Build and maintain a meaningful and strong decision-making process and structure to ensure Tribal leadership and co-develop in all aspects of future offshore wind facility design, review, construction, operations, repowering, and decommissioning.
- Tribal liaisons within the Governor's Office and relative state agencies should work in partnerships with Tribal liaisons and officers at federal departments and agencies, such as

¹⁴ California Coastal Commission. March 17, 2022. Staff Report. Pg. 104. <https://documents.coastal.ca.gov/reports/2022/4/Th8a/Th8a-4-2022%20staffreport.pdf>

¹⁵ Government to government consultation pursuant to tribal law and/or other practices and protocols, and including requirements under Section 106 of the National Historic Preservation Act (NHPA).

the Department of the Interior, Department of Energy, BOEM and the Bureau of Safety and Environmental Enforcement (BSEE), among others. The Tribal liaisons should be based within the region for the duration of the leases and related repowering and decommissioning to strengthen co-management, coordination processes and relationships with Tribes.

- All state and federal agency staff should be required to attend training designed by Tribal Nations with cultural and/or historical ties to the lease areas, on their cultures, histories, governance structures, interests and concerns, best practices for relationship building and concepts such as Tribal sovereignty and self-determination, ecological knowledge and land return.
- Incorporate outcomes from other assessments at the State and Federal levels such as BOEM’s West Coast Tribal Cultural Landscapes assessment and the California Coastal Commission’s Consistency Determinations Report into the Strategic Plan and ensure that state agencies adhere to and incorporate guidance for meaningful engagement, co-design, and co-management with Tribes.

B. Community Safety: Addressing the Missing and Murdered Indigenous Peoples (MMIP) Crisis and Ensuring Community Safety

Given the severity of the MMIP crisis, the Strategic Plan must include stronger measures and implementation of a safety protocol to ensure the safety of Native people and others who are at-risk of in the Redwood Region, and across the state.

Our region has a well-documented history of MMIP, sex trafficking, and sexualized violence associated with transitory workers during cycles of industry and development. Since the gold rush, and through the timber, land, water, and cannabis rushes continuing to the present day, countless Native women, girls, and two-spirit individuals have been lost to violence. Across the U.S., California has the fifth largest MMIP caseload, and one in five of the state’s MMIP cases are from Humboldt County.¹⁶

The AB 525 Strategic Plan should create clear protocols and protections to ensure community safety for Native women, girls, two-spirit individuals, and others who are most vulnerable. Efforts from state agencies must include measures designed to avoid, mitigate, and minimize MMIP and incorporate prevention, education, policy-making, enforcement, response, and funding. To make these efforts effective, state agencies must meaningfully engage with Tribes and Native communities and provide support for participation. Best practices include:

- Develop safety plans with elements that apply to all workers, including both direct employees and contractors. Plan elements should include, but not be limited to, zero tolerance policies; whistleblower protections; clear protocols for responding to safety issues; worker and management training on applicable issues, history and policies; and other tools to promote workplace and community safety. Plans should be developed and

¹⁶ Abinanti, A., Cavaliere, A., Nulph, A., George, B., Lucchesi, A., Madrid, M., Fisher, A., Ruecker, T., Preciado, V., Smith, J., Balandran, G. (July 2020). *To’ Kee Skuy’ Soo Ney-Wo-Chek’ I Will See You Again in a Good Way Progress Report* (pp. 28). Yurok Tribal Court and Sovereign Bodies Institute. Accessed February 2024, from https://www.sovereign-bodies.org/files/ugd/6b33f7_c7031acf738f4f05a0bd46bf96486e58.pdf

monitored early and often in consultation with regional Tribal Nations and include policies to comport with Tribal ordinances, including use of Tribal judicial systems.

- Organize pre-development meetings with Indigenous leaders, Tribal Nations, and Native communities to create an MMIP & trafficking prevention plan.
- Hold ongoing, regular meetings with Native communities to monitor impacts of development.
- Address MMIP and trafficking in corporate/Tribal communications plans.
- Conduct company and worker background checks.
- Monitor and ensure safety in employee housing.
- Establish agreement to ensure that Tribal people and vulnerable populations living on/near port development or other OSW-related facilities sites have access to transportation.
- Ensure lessees, developers and contractors conduct employee training.
- Coordinate with and support stronger law enforcement in the region.
- Support victim services & social services.
- Source employees locally and invest in local workforce development.
- Adopt corporate policies to prevent MMIP and sex trafficking.
- Strengthen employee code of conduct.
- Implement whistleblower protections.
- Community safety workshops in the North Coast region should take place between Tribal Communities, other necessary interested parties, and relevant state agencies to define what protocols and enforcements are needed in community safety plans.

We urge the CEC to consider the full set of detailed actions and prevention measures listed in the Yurok Tribal Court’s 2023 report titled *How to Protect Native Women, Girls, and People in Humboldt & Del Norte County as Offshore Wind Enters the Region: MMIP Prevention Planning and Recommendations*.¹⁷

C. Marine Impacts: The AB 525 Strategic Plan Should Recommend a Full Environmental Review Processes with Tribal and Community Engagement, and Support the Formation of

¹⁷ Abinanti, Abby and Katcher, Katherine. “How to Protect Native Women, Girls, and People in Humboldt & Del Norte County as Offshore Wind Enters the Region: MMIP Prevention Planning and Recommendations.” Yurok Tribal Court, 21 June 2023, <https://lostcoastoutpost.com/loco-media/loco-media/blog/post/37499/How%2Bto%2BPrevent%2BMMIP%2BAnd%2BProtect%2BNative%2BWomen%2BGirls%2BAnd%2BPeople%2Bin%2BHumboldt%2B%2BDel%2BNorte%2BCounty%2Bas%2BMajor%2BDevelopment%2BProjects%2BCome%2BInto%2Bthe%2BRegion27%2B%2528002%2529.pdf>

and Funding Mechanisms for a West Coast Offshore Wind Science Entity that Leads Best Practices and Innovations in AMMM and Adaptive Management.

Offshore wind development has the potential to threaten diverse landscapes, marine and terrestrial ecosystems, and aquatic species across the state. It is crucial to assess the cumulative impacts of floating offshore wind on onshore and offshore ecological systems through the environmental review processes of CEQA and NEPA. We discuss these potential impacts more thoroughly in the PEIS letter our partners recently submitted to BOEM.¹⁸ The final Strategic Plan should incorporate the findings of the PEIS.

The following environmental impacts highlighted below are of significant concern.

- **Noise** impacts from construction, operations, maintenance of large scale offshore wind projects.
- **Disturbance of habitat, behavior, and migration patterns** by offshore related infrastructure, such as cables, anchors, platforms impacting benthic habitats. In the North Coast, these may alter the behavior and migration patterns of fish, migratory birds, whales, and other marine species. Due to increased port development, habitat disturbances may occur and impact eelgrass and kelp beds.
- **Ship strikes** on marine mammals and marine turtles due to increased use of vessel traffic.
- **Electromagnetic fields** caused by an increased number of transmission cables in the seabeds leading to alteration in habitats and species.
- **Upwelling** from wind energy structures impacting fish and marine invertebrates.
- **Emissions pollution** impacts from vehicular and construction equipment on plant species, such as moss and lichen that are native and already rare on the North Coast.
- **Introduction of invasive species and pathogens** due to vessel traffic, construction of transmission lines, substations, and other offshore wind related infrastructure.¹⁹
- **Water quality impacts** resulting from dredging and result in disturbing legacy pollutants or an increase in pollution from impervious surface runoff.

Within the Strategic Plan, it is critical to specify that an implementation plan for any measures shall include engagement of Tribal Nations, and those with scientific and local knowledge throughout the environmental review process. Opportunities to strengthen the recommendations in the Strategic Plan are stated below:

¹⁸ Joint Comment Letter on Notice of Intent to Prepare a Programmatic Environmental Impact Statement (PEIS) for Future Floating Wind Energy Development Related to 2023 Leased Areas Offshore California. February 20, 2024. <https://www.regulations.gov/comment/BOEM-2023-0061-0172>

¹⁹ Notably, Humboldt Bay is the only waterbody in California free of oyster diseases and certified to raise oyster seed to ship around the world. Loss of this certification would have cascading impacts on the West Coast oyster industry and beyond. Walters, H. (2024, January 29). *The World Is Yours, Oyster Farmer*. North Coast Journal. <https://www.northcoastjournal.com/news/the-world-is-yours-oyster-farmer-2133083>

- An acknowledgment of BOEM’s acceptance of Conditions 1 through 7 imposed by the California Coastal Commission’s (CCC) Consistency Determination CD-0001-22 cited beginning page 10 of the March 17, 2022 CCC staff report.²⁰
- Recommend and account for continuous outreach and engagement with those who are exhibiting and witnessing impacts through lived experiences and livelihoods, to understand marine, fishery and aquaculture impacts. These stakeholders include Tribes, commercial, subsistence, recreation, and cultural aquaculture and fishing people.
- Support for a West Coast Science Entity with Tribal leadership and local engagement with expertise and capacity to focus on protocols for baseline data collection, establishing data collection priorities, analysis, and reporting; developing avoidance and mitigation strategies, adaptive management, and planning for repowering and decommissioning.
 - We request support from State Agencies to advocate for creating and funding this science entity. As courts in the Ninth Circuit have held,²¹ and as both federal and California state agencies have attested, agencies must consult the best available science regarding environmental considerations and existing uses of the ocean to inform their decision making. This includes as a central principle application of Traditional Ecological Knowledge and Sciences of Indigenous Peoples.
 - Current Draft AB 525 Strategic Plan recommendations state that data from commercial, recreation, subsistence, and cultural fishing resources should be used to analyze and assess the impacts to fishing in coastal and marine environments.²² We note that current fisheries data and studies available from the East Coast may have technological, cultural, socioeconomic differences, and varied ecosystems in offshore wind development; these differences underscore the need for a West Coast Science Entity.
 - The designation of a single entity will streamline coordination between stakeholders to define scientific research methods and data collection and use the best scientific research available for environmental impact and AMMM measure assessment.
 - Adaptive management should be a key component of the scientific entity, creating opportunities for changes in AMMM measures in response to behavior, habitat alterations, changes in migratory patterns, and health.²³

²⁰ California Coastal Commission. March 17, 2022. Staff Report. <https://documents.coastal.ca.gov/reports/2022/4/Th8a/Th8a-4-2022%20staffreport.pdf>

²¹ See, e.g., *Conner v. Burford*, 848 F.2d 1441, 1454 (9th Cir. 1988); see also *San Luis & Delta-Mendota Water Auth. v. Locke*, 776 F.3d 971, 995 (9th Cir. 2014); *National Parks & Conservation Ass’n v. Babbitt*, 241 F.3d 722, 732 (2001) (agency must attempt to resolve uncertainty by collecting further data *before* a decision is made); *Sierra Club v. U.S. Forest Service*, 843 F.2d 1190, 1195 (1988).

²² Taken from Draft AB 525 California Offshore Wind Strategic Plan Volume I: Overview, Pg. 32.

²³ 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>.

- An entity modeled after elements of the Regional Wildlife Science Collaborative, with strong Tribal leadership, could serve a useful purpose on the West Coast in advancing the understanding of the science of environmental impacts of offshore wind development on local communities, Tribes, and economic and culturally important environmental resources.
 - In conjunction with the West Coast Science Entity, we recommend a robust Local Science and Adaptive Management Committee to discern the best use of scientific strategies and guidance for the Science Entity and have governance authorities.
 - Increased data transparency and the co-creation of adaptive monitoring and management plans with Traditional Ecological Knowledge and local knowledge holders can strengthen AMMM measures.
 - For the North Coast, these committees would be comprised of representatives²⁴ from local Tribal Nations, Humboldt Bay Harbor District, California Coastal Commission and other Tribal, Federal, State, and local wildlife and natural resource departments, local environmental and community-based organizations, local fisheries and aquaculture, wildlife, and marine science experts, and those with lived environmental stewardship experience.
 - Contracting and services for the aforementioned monitoring and scientific studies should be preferenced to local entities.

D. Fisheries and Aquaculture: Commercial, Cultural, and Sustenance Fishing and Aquaculture are Important to the Region.

In addition to fisheries and aquaculture concerns raised in the previous section on impacts to the marine ecosystem, we affirm the importance of fishing and aquaculture for commercial, cultural, and sustenance purposes in our communities. Locally, the Wigi/Humboldt Bay’s robust commercial fishing and aquaculture industries and prolific recreational opportunities provide an economic resource for the community. Most critically, though, the Bay provides a relatively inexpensive, local and high-protein food source, and Tribal Nations rely on natural resources in Wigi and rivers fed by (and immediately to the north and south of) the Bay for commercial, cultural, and sustenance fishing. Hmong and Lao fishers also depend on sustenance fishing and clamming on Wigi.

We agree with the Strategic Plan that there is an imminent need to preserve local Tribal, commercial and recreational fishing, and aquaculture. We also support comprehensive AMMM measures for impacts on fisheries, aquaculture, subsistence fishing, and low-income recreational opportunities.

Moreover, we are pleased to see the Strategic Plan’s acknowledgment of cumulative impacts on the existing maritime and fishing industries, including Tribal fisheries in the Bay and rivers within Indigenous and Tribal lands in the greater region. Other potential cumulative impacts

²⁴ Representatives will receive compensation for their participation.

include increased congestion from additional shipping and hauling in the transportation channel in Humboldt Bay. We encourage CEC to work with relevant federal, state, and local agencies and interested parties to fully assess the cumulative impacts of development.

E. Underserved Communities: The Plan should recommend coordination with state and local agencies on AMMM measures for strains on local housing and social and built infrastructure.

We commend the Strategic Plan’s discussion of impacts and its highlighting the need for energy access and equity for underserved communities, although not statutorily required by AB 525. Today, many communities throughout the North Coast are considered ‘disadvantaged,’ ‘underrepresented,’ or ‘environmental justice communities’ due to the high proportion of low-income households, and a high-density of Tribal Lands and Allotments.²⁵ Our communities’ needs are rooted in (i) a lack of clean, reliable electricity, broadband, transportation, and other infrastructure; (ii) a lack of access to health, childcare and other social services; (iii) a lack of high-quality educational and other career technical opportunities for youth; (iv) a lack of access to healthy food; and (v) a growing housing shortage at all income levels.

The Strategic Plan should include more concrete steps to mitigate offshore wind development’s potential negative economic implications for local underserved communities. An exacerbated housing crisis stemming from offshore wind development is an outstanding concern to our community. Currently, Humboldt and Del Norte County residents spend an average of 39% and 38% of their income on housing, respectively.²⁶ Rental vacancy rates in Humboldt County were recently as low as 4.2%, indicating limited availability and housing insecurity. Furthermore, the number of people experiencing homelessness in Humboldt County is nearly five times the national average. This is likely an underestimate given data collection challenges.²⁷ While offshore wind-related jobs have the potential to bring economic benefits to the North Coast, a large workforce influx will strain housing and community services within Humboldt, Del Norte, and surrounding counties. Increased activities related to offshore wind may also stress community resources such as access to healthcare services, roads, wastewater systems, and other aging public infrastructure.

The Strategic Plan must address the needs of underserved communities and provide measures to minimize the impacts of offshore wind development. We urge CEC to provide leadership in coordinating with or calling on state, Tribal, and local planning, housing, and social services agencies for the following:

- Ensure that local communities experience the benefits of offshore wind energy such as the capacity needed to support electrification and upgrades to our regional electrical grid and receiving affordable energy generated through local offshore wind development.

²⁵ Final Designation of Disadvantaged Communities Pursuant to SB535, 2022 https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/infrastructure/disadvantaged-communities/dacag-equity-framework.pdf?sc_lang=en&hash=130F6FD0AEA89095CD0EAC455D0C60EE

²⁶ CA Department of Housing and Community Development. (February 2018). California’s Housing Future: Challenges and Opportunities, Final Statewide Housing Assessment 2025. Accessed July 2022 from https://www.hcd.ca.gov/policy-research/plans-reports/docs/sha_final_combined.pdf

²⁷ Humboldt County Department of Health & Human Services, Public Health. (2018). 2018 Humboldt County Community Health Assessment. Accessed July 2022, from <https://humboldt.gov.org/DocumentCenter/View/71701/2018-Community-Health-Assessment-PDF>

- Provide maximum infrastructure benefits, such as transportation, renewably-generated electricity, and broadband for local underserved communities.
- Analyze immediate and future population impacts of the offshore wind industry, and determine the associated social services, housing, childcare, medical, and emergency services that will be needed in the area so those facilities can be planned by regional institutions and funded by a combination of state and federal funding, lessees and developers, philanthropy, and local jurisdictions.
- Develop and implement an anti-displacement strategy to ensure that residents of communities impacted by an influx of employees of the offshore wind industry are not displaced if housing demand and rents increase.
- Measure impacts and displacement of existing residents, and develop programs aimed at early recognition and intervention.
- Require developers and subsequent leaseholders to create or contribute to existing housing funds that reduce the housing burden for those most vulnerable to homelessness, or lead to community or Tribal ownership of housing.

F. Leveraging State Authority to Strengthen Environmental and Cultural Resource Protections and Community Benefits.

We are in agreement with the Natural Resources Defense Council and their environmental organization partners that²⁸:

“The Strategic Plan can significantly improve its articulation of opportunities to directly shape mitigation and research requirements for developers, advancing environmentally responsible offshore wind development. Throughout the power procurement process and consistency review, state agencies and utilities could wield considerable influence in supporting conservation goals and initiatives. This could be achieved by integrating funding for environmental research into power agreements, incorporating environmental conditions as a bid criterion in competitive solicitation processes, and employing other strategic measures.

The limited centralized procurement authorized under AB 1373 empowers the state to shape conditions governing the competitive solicitation process, including the imposition of requirements to promote environmental research and monitoring. The draft Strategic Plan acknowledges that centralized procurement is an effective tool for ensuring compliance with policy directives, such as reliability,²⁹ and it can similarly bolster environmental objectives. Along the Atlantic Coast, states like New York, New Jersey, and Connecticut have leveraged centralized procurement to mandate developers' financial contributions to wildlife and fisheries research, conservation, or mitigation efforts.

²⁸ Colleagues at the Natural Resources Defense Council (NRDC) and their environmental organization partners have prepared and submitted to the CEC an excellent comment letter on the draft Strategic Plan. This section content from their letter, with permission.

²⁹ Pg. 30, Volume II

Furthermore, the state also has the ability to influence lease sales in ways that can promote environmental and wildlife responsible development.” California was very effective in influencing BOEM’s 2022 lease sale stipulations - including in environmental protections and expansion of bid credit structure. The Strategic Plan should reference these successes and articulate how to expand upon them going forward. One opportunity would be to explore how an environmental protection or conservation bid credit could contribute to advancing the state’s environmental goals.

Chapter 5: Selection of Suitable Sea Spaces Must be Rooted in Robust Research, Extensive Community Outreach, and Early, Informed, and Complete Tribal Consultations and Co-Management

Building on the recommendations listed in Chapter 4, we re-emphasize that there are substantial gaps in our current understanding of the potential impacts that offshore wind projects may have on sea spaces, wildlife, and their habitats. There is also a significant need for further research on the interaction between wildlife and offshore wind energy, particularly concerning the effectiveness of measures aimed at avoiding, minimizing, and mitigating these impacts.

Future development of offshore wind projects must carefully assess areas of potential conflict that could affect key marine species, including fish, mussels, birds, whales, salmon, and other significant marine life. Regions near Del Norte and Mendocino Counties, identified as potentially suitable for sea space, are critical habitats for species that could be adversely impacted by offshore wind development. Specifically, culturally important fish species, such as salmon, hold cultural significance to Tribal Nations that steward the lands and oceans of these areas. In addition to continuing the coordination with BOEM specified in the draft Strategic Plan, we recommend that the Plan include specific guidance for the following:

- A. Early and Informed Tribal Consultations and Pathways to Co-management.**^{30 & 31} Tribal consultation and decision making must be implemented prior to and throughout the planning, construction, operation, and decommission stages. Coordinating with other agencies to implement existing recommendations and requirements will be imperative to implement Tribal consultation. For example, the California Coastal Commission's staff report from March 17, 2022, beginning on page 104, addresses BOEM’s offshore lease and includes discussions on the potential for cultural and ethnographic resources to be uncovered during the development of future offshore wind facilities, along with other potential impacts. Furthermore, the report calls for establishing a protocol for direct communication with Tribes in the event of an unexpected discovery, as well as a post-discovery process for evaluating such discoveries.³² The CEC should also identify opportunities for Tribal co-management in determining future wind energy areas.
- B. Tribal Leadership and Traditional Knowledge.** Build and maintain a meaningful and strong decision-making process and structure to ensure Tribal leadership in all aspects of identifying and

³⁰ Pursuant to AB 52, public agencies are required to consult with California Native American tribes that are on the Native American Heritage Commission’s (NAHC) consultation list that are traditionally and culturally affiliated with the geographic area of a proposed project subject to CEQA, when tribes request formal consultation.

³¹ Government to government consultation pursuant to tribal law and/or other practices and protocols, and including requirements under Section 106 of the National Historic Preservation Act (NHPA).

³² California Coastal Commission. March 17, 2022. Staff Report. <https://documents.coastal.ca.gov/reports/2022/4/Th8a/Th8a-4-2022%20staffreport.pdf>

making decisions about suitable sea space and future wind energy areas. Tribal expertise and jurisdictional authorities must be incorporated throughout offshore wind development to ensure that processes include Tribal science, traditional knowledge, and cultural practices so that region-specific Tribal cultural resources can be protected.

- C. Tribal Cultural Landscapes.** On the North Coast, there are sites across Humboldt Bay, Trinidad Bay, the mouth of the Klamath, and other nearby coastal areas that hold cultural significance and key cultural resources for regional Tribes that are inappropriate for offshore wind development. We recognize that there are ongoing efforts, such as the assessment on West Coast Tribal Cultural Landscapes conducted by BOEM, in growing understanding of Tribal landscapes that may be affected by offshore wind development. Close coordination with BOEM and other agencies is crucial to deepening the understanding of robust marine archaeological measures. These studies and measures will be crucial in ensuring testing, monitoring, and other related activities do not disturb Tribal cultural and historical landscapes.
- D. Information Sharing and Data Transparency.** The Strategic Plan should recommend regular and consistent reporting, which could include but is not limited to: mechanisms for regular reporting, housing, and public data sharing, including monthly reporting requirements of natural resource surveying and monitoring data during construction and decommissioning, and quarterly reporting during operations, with 24-hour reporting of certain wildlife fatalities, or other major events with wildlife or environmental impacts, including proposed best practices for notification, investigation, and mitigation of further damages.

Chapter 6: Port and Waterfront Infrastructure Should Be Co-developed by and for Communities.

We recognize the critical role offshore wind and associated development play in supporting California's goal of meeting its 100% clean energy goal by 2045. It is crucial that port and waterfront development, as early steps to meeting energy goals, include sufficient provisions for community, cultural and environmental protections, investments and benefits, and be fully compliant with CEQA so that local voices have the information they need to participate in the decision-making process. This is particularly crucial for the North Coast as the development of Humboldt Bay Offshore Wind Heavy Lift Marine Terminal will serve a key role in staging, integration, operations and maintenance for West Coast offshore wind facilities. We urge the Strategic Plan to further evolve existing recommendations and incorporate additional recommendations.

- A. Full CEQA and NEPA Compliance.** We agree with the statement in the strategic report that thoughtful planning and specific mitigations should be applied based on the effects identified through future site-specific CEQA and NEPA analyses and coordination with permitting agencies and the public. Moreover, the Strategic Plan should include an explicit recommendation that all developments must achieve full compliance with CEQA and NEPA and follow proper compliance timelines. Moreover, we strongly encourage the Strategic Plan to consider incorporating mitigations or addressing concerns raised in the Redwood Region Partners' joint letter to BOEM, submitted on February 20, 2024, in response to the Notice of Intent to Prepare a PEIS for Future Floating Wind Energy Development Related to the 2023 Leased Areas Offshore

California.³³ We are concerned about both the direct impacts and cumulative impacts from the port development and urge CEC to provide additional guidance to ensure a strong NEPA and CEQA process, safeguarding the North Coast’s cultural, environmental, and socio-economic landscapes.

- a. *Prepare Project-specific Environmental Analyses.* CEC should work in collaboration with local agencies and BOEM to ensure that BOEM’s Program Environmental Impact Studies (PEIS) does not replace project-specific Environmental Impact Studies (EIS) or the Environmental Impact Report (EIR) under CEQA. The future project-specific EIS and EIR will include site-specific AMMMs, which should also be incorporated into future agency approvals.
- b. *Uphold Procedural Requirements.* CEC should coordinate with state permitting agencies to ensure that EIR process and sequencing is appropriate to project development timeframe and sequencing; and that the EIR analyze the “whole of the action,” which includes any and all actions associated with the Wind Terminal development, beyond the development of the terminal alone.
- c. *Analyze a Full Range of Potential Impacts.* The environmental analyses must consider a full range of all potentially significant environmental impacts, specifically including: protecting Tribal cultural resources, preserving Tribal cultural landscapes, ensuring safety, protecting biological resources, minimizing infrastructure impacts, abating air quality and greenhouse gas emissions, alleviating maritime congestion, addressing impacts of Project related traffic on surrounding communities, minimizing aesthetic impacts, protecting water quality, minimizing land use and operational impacts, minimizing impacts to fisheries and Bay industries, and protecting recreational opportunities in and around Humboldt Bay.³⁴ Specific considerations should include but not limited to:
 - i. Measures for addressing air quality and greenhouse gas emission impacts of transportation generated by the offshore wind facility – both for construction (materials, manufacturing, assembly, and employees) and ongoing operations (maintenance and employees).
 - ii. Mitigations for increased on road and marine traffic associated with the offshore wind industry, including construction, operations, and related manufacturing activities poses notable impacts on the region’s on-road and marine traffic.
 - iii. Plans for addressing Impacts on existing facilities within the wind terminal area that include seaweed farms, shellfish nurseries, mariculture sites, scientific testing sites, commercial fishing storage, and boat facility repairs.

B. Community Agreements for Port Development. Port development as well as other associated offshore wind developments should align with Newson and Biden Administrations’ commitments to equity, climate, and community protections by incorporating built-in mechanisms for community oversight, information sharing, and community governance, along with investments

³³ *Joint Comment Letter on Notice of Intent to Prepare a Programmatic Environmental Impact Statement (PEIS) for Future Floating Wind Energy Development Related to 2023 Leased Areas Offshore California.* February 20, 2024. <https://www.regulations.gov/comment/BOEM-2023-0061-0172>

³⁴ CORE Hub and Partners from the Offshore Wind Community Benefits Network. *Joint Letter on Notice of Preparation of a Draft Environmental Impact Report for the Humboldt Bay Offshore Wind Heavy Lift Multipurpose Marine Terminal Project.* Pp 61-93. August 25, 2023. https://humboldtby.org/sites/humboldtby.org/files/0_WindTerminal%20NOP%20Comments-Redacted-optimized.pdf

for participation in these processes.³⁵ & ³⁶ The Strategic Plan should recommend local agencies and developers to engage underserved communities to enter into community agreements that include best practices and commitments to deliver socioeconomic benefits, create community governance structures, and address impacts on the surrounding communities.

- C. Dedicated Funding for Communities and Tribal Nations.** In support of the port development and readiness framework recommended in the Draft Strategic Plan, we recommend targeted engagement with local communities, underserved communities, and Tribal Nations to understand the unique challenges facing our communities. In particular, we recommend the Strategic Plan to explore additional mechanisms in delivering tangible community benefits, such as requiring a percentage of funding sources allocated to port development to be dedicated to addressing community needs identified by impacted communities.
- D. Adopting Best Available Zero-emission Technologies.** State Agencies should work with local harbor districts, developers, and other federal agencies to ensure the adoption and deployment of the best available zero-emission equipment and technologies. This will require state transmission infrastructure investment to increase capacity on the Samoa Peninsula to facilitate a net-zero emissions port. Collaboration is critical for protecting our communities, safeguarding the environment, and maximizing climate benefits.
- E. Emergency, safety and disaster planning and resourcing.** Emergency and disaster planning for this major, novel, and unplanned infrastructure needs to be developed in concert with community, local authorities, and disaster response agencies. Planning and response resources have not been integrated into local disaster response systems, particularly given the region's remoteness and hazards such as seismic, maritime, and other natural and human made risks. Additionally, industry oversight about contingency and hazard planning in coordination with local authorities should be an annual requirement. We recommend the Strategic Plan incorporate disaster preparedness, mitigation, response and resilience measures, including an industry disaster risk mitigation plan and strategy for funding resources for local governments and agencies for disaster scenario planning, mitigations, response and recovery.

Chapter 7: Create Workforce Development Measures in Close Collaboration with Local Labor and Workforce Partners, Local Agencies and Businesses, and Tribal Nations to Ensure Targeted Local Hiring and Training.

We are pleased to see that the Draft Strategic Plan outlines exciting potential growth for California's workforce, including significant workforce development opportunities and jobs in Northern California to support port development, offshore wind construction, operation and maintenance, and related infrastructure build outs. With recommendations such as high-road workforce standards, safety requirements, training and apprenticeships, Project Labor Agreements, and community benefits agreements, the Strategic Plan demonstrates the paths forward for developing targeted and equitable local hiring standards.

In addition to existing recommendations in the draft, we recommend the Strategic Plan to provide guidance around the following provisions to ensure equitable workforce development standards. The

³⁵ Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*.

³⁶ Executive Order 14008, *Tackling the Climate Crisis at Home and Abroad*.

Draft Strategic Plan also references the Community Benefits Agreement (CBA) as one of the important vehicles for capturing economic benefits. While a successful CBA would certainly secure economic benefits for the community, we also proposed to broaden the scope of benefits in CBAs in offshore wind development in the general comment section, which aims to provide community-based and Tribe-specific solutions for addressing socioeconomic and environmental issues. Tribal agreements are an important part of equitable workforce development strategies and should be reflected in Chapter 7.

- A. Co-developing Targeted Hiring and Training Standards with Local Communities, Labor and Workforce Partners, Local Agencies and Employers, and Tribal Nations.** We support the Strategic Plan’s recommendation encouraging coordination with local communities, Tribes, workforce training centers, government agencies, community organizations, employers, high schools, community colleges, and universities to create career opportunities, workforce training, and economic development benefits. Developing effective hiring and training targets relies on resourcing and supporting communities and partners, and investing in existing institutions and successful programs whenever possible. Specific plans, co-developed with local partners for training of a local skilled workforce in all aspects of the offshore wind industry cluster, could include commitments to local targeted hire groups, especially from Tribal communities, commitments to training, courses, apprenticeship, and pre-apprenticeship programs (including Tribally-run programs) designed specifically to support career paths for local underrepresented communities and Tribal members. Such targeted training programs should include training commitments for members of local Tribal Nations and underrepresented communities and off-ramp provisions. It is important that workforce plans also include opportunities for local firms/employers to participate in the industry cluster.
- B. Tribally-owned and Minority-Owned Businesses.** Prioritize local Tribally-owned and local minority-owned businesses through contracting opportunities, employment, supply chain materials, and other procurement opportunities to retain wealth within the region. Recommendations should include specific language detailing how the offshore wind and supporting industries will procure services from small and disadvantaged local businesses, supporting Department of Interior (DOI) policy commitments to contract with these target communities and eliminate wealth gaps. The specific language should also provide guidance on how the developers and agencies will partner with Tribal Nations, Tribal Economic Enterprises, and Tribal Employment Rights Offices (or equivalent offices at non-federally recognized Tribes) and provide pathways and opportunities for ownership for Tribal Nations.
- C. MMIP Prevention and Protections.** As noted previously, an important strategy for preventing MMIP and trafficking is to source employees locally and invest in local workforce development. Workforce training and policies to prevent and address MMIP, trafficking, and sexualized violence must be part of how we prepare employees, employers, government agencies and communities to do business in ways that are healthier for workers, climate and community. We recommend that the CEC reiterate workforce related MMIP protections in Chapter 7.
- D. STEM and Natural Resources Careers.** While a smaller percentage of the total workforce needed to develop, operate, repower, and decommission offshore wind will be those in science, technology, engineering, math and natural resources jobs, given the highly technical nature of offshore wind and need for robust AMMM measures and adaptive management, we recommend including greater representation of workforce and career pathway development needs for these

jobs. It is important to reflect the State's commitment to ensuring offshore wind moves forward with robust capacity to successfully implement AMMM measures, adaptive management, and permitting and regulatory frameworks with robust accountability mechanisms. Attention to this smaller but critical component of the new offshore wind workforce in the Strategic Plan is critical if we are to achieve an industry that is able to achieve climate change mitigation and environmental protection goals.

Chapter 8: Transmission Planning and Assessment Must Provide Meaningful Opportunities for Local Communities and Tribal Nations to Participate in the Decision-Making Process and Outline Paths to Co-Management and Co-Ownership of Electrical Assets.

As the Strategic Plan aptly notes, the Redwood Region's transmission system is limited and relatively separate from California's major transmission networks that run north and south. Most of the power is imported into the region from the east via 115kV lines, with the Humboldt Bay Generating Station, a gas-fired power plant, serving the local and regional load. Unfortunately, electrical infrastructure capacity in the Redwood Region is strained and underdeveloped, particularly in more rural parts of the region, reinforcing the socioeconomic gaps faced by local communities and Tribal Nations. Parts of the region consistently lose power due to natural disasters, extreme weather, and public safety power shutoffs (PSPS). Many areas are located at the remote end of the existing electrical grid, which imposes challenges on energy access and reliability. In addition to energy reliability challenges, the region's power infrastructure now faces additional risks from the increasing frequency and intensity of extreme weather events caused or exacerbated by climate change.

Infrastructure needs are great in the Redwood Region, and these needs will increase as the region becomes a central component to the offshore wind industry through port development, energy generation, supply-chain infrastructure, and the transmission needed to bring power to the central grid.

We agree with the recommendations outlined in the Strategic Plan relating to large investments needed for new or existing electrical infrastructure to deliver electricity to local communities and the larger grid, and that such investments and project considerations will require additional detailed corridor planning. However, we are concerned that there is no mention of how and when local communities and Tribal Nations would be able to engage in the decision-making process for this infrastructure, especially for impacted communities that are located in areas where infrastructure would be sited and constructed.

If done in partnership with local communities and Tribal Nations, offshore wind provides a tremendous opportunity to fight climate change, promote climate resilience, and establish the Redwood Region as an energy-secure community. Offshore wind and transmission deployment must be designed and sited intentionally to enhance energy resilience, reliability, affordability, and access; provide for the infrastructure necessary to support the incoming economic development and the development of local clean energy resources (e.g., microgrids, solar, and storage technologies); avoid and minimize natural and cultural resource impacts; support rural and Tribal economic vitality and competitiveness; and, enable communities to affordably meet their local energy needs through ownership of clean energy resources in order to stay safe at home in the face of increasing climate impacts.

Moreover, any transmission infrastructure deployed to facilitate the deliverability of offshore wind in the Redwood Region must prioritize serving local communities and Tribal Nations in the Redwood Region first. Significant investment in transmission infrastructure hasn't happened in the region since the mid-20th century.³⁷ Utility infrastructure and services often stop just outside the border of Tribal lands, contributing to poverty and forcing Tribes that lack electric grid access to rely on diesel generators. This is particularly true in the Redwood Region, where Tribal lands have been excluded from energy and communications access. Meanwhile, the region's river systems have been dammed and diverted for energy production and water sourcing for the rest of the state, impacting Tribal Nations. Today, many Tribes in the Redwood Region have become nationwide leaders in innovation and improving energy access, such as through microgrids at the Blue Lake Rancheria, but needs remain from decades of underinvestment.

There must be early, meaningful, and frequent Tribal consultation and a community engagement process for Tribal and local communities to have a say in how this development is designed, planned, and deployed. This is of particular importance for the CEC given its adoption of a resolution in March 2023 committing the agency to support California Tribal energy sovereignty and independence.³⁸ Transmission investments should be made in alignment with policies and initiatives that support meaningful consultation, partnership, and benefits sharing with California's Native American Tribes, including ownership, regulatory authority, and revenue sharing opportunities, and delivering clean, affordable, and reliable energy benefits for energy independence, self-sufficiency, and self-reliance.

Moreover, local, community-based organizations must be fairly compensated and given the resources to meaningfully engage in this unprecedented infrastructure buildout. This could support deeper community investment and engagement in not only the early development process but in a healthy and thriving industry for years into the future, as well as deepening state, federal, and private investments in communities where this new industry is being established.

Finally, we agree with the CEC's recommendation regarding a phased transmission planning approach. More importantly, the phased approach should be proactive. A phased approach can help reduce costs, allow for flexibility when adjustments are needed, and be carefully considered at a pace for local communities and Tribal Nations to meaningfully participate. The CEC must guarantee Tribal leadership in the process, as well as local agency, community decision-making, and localized benefits.

Given these comments, we offer the following considerations for the various transmission scenarios provided by the Schatz Energy Research Center³⁹.

³⁷ DeSouza Briggs, Xavier; Jackson, Linnea; and Oskarsson, Katerina. March 2024. The clean energy revolution is headed through rural and tribal communities. It's time to choose the right path. *The Brookings Institute*. <https://www.brookings.edu/articles/the-clean-energy-revolution-is-headed-through-rural-and-tribal-communities-its-time-to-choose-the-right-path/>.

³⁸ California Energy Commission. March 2023. *Resolution Committing to Support California Tribal Energy Sovereignty*. <https://www.energy.ca.gov/filebrowser/download/5280>

³⁹ Zoellick, J., G. Adams, A. Mustafa, A. Cooperman, R. Anilkumar, P. Duffy, A. Sparks, S. Kramer, S. Trush, S. Bernstein, C. Butler, A. Porter, A. Herath, M. Cesario, E. Wallach, C. Ingvoldsen, D. Wakeman, C. Chamberlin, and A. Jacobson. (2024). Northern California and Southern Oregon Offshore Wind Transmission Study, Volume 1 (Revised). Cal Poly Humboldt, Arcata, CA: Schatz Energy Research Center. [schatzcenter.org/publications/](https://www.schatzcenter.org/publications/)

A. Transmission projects that can serve local communities and Tribal Nations should be prioritized. The scenario that most aligned with this prioritization is Alternative 7.2b. This is reflected by two key projects: a 500 kilovolt (kV) transmission line from Humboldt to Fern Road, and a high-voltage direct current (HVDC) line from Humboldt to Collinsville. This is aligned with the California Independent System Operator’s (ISO) recommendation in its 2023-2024 Draft Transmission Plan.⁴⁰

However, for many rural and Tribal regions, it may be structurally and financially difficult for them to be directly served by offshore wind generated electricity due to terrain and other complexities. Including complementary renewable infrastructure solutions, such as microgrids and battery storage, as part of the transmission planning process is critical to a just transition and in alignment with the CEC’s Tribal energy sovereignty resolution.⁴¹

As part of the planning process and to ensure host communities experience benefits, the Strategic Plan should analyze and discuss potential opportunities for energy revenue sharing with host communities and Tribal Nations. This could include direct funding to Tribes and local communities, investments in local infrastructure from annual revenue generated, and reduced rates for local ratepayers.

Local communities are more likely to benefit and conflicts may be mitigated with greater coordination on transmission projects between developers, utilities, Tribal Nations, and local, state and federal agencies in planning processes, particularly to ensure dig once execution, expanding existing transmission right of ways, and sharing a common analysis and understanding of economic and social costs and potential benefits of transmission build outs.

B. Provide further study and analysis on the differing potential benefits, impacts, and costs between transmission projects that are sited on land or in the form of subsea cables. The first example of a potential alternative analysis would be in Alternative 7.2b, where there is consideration for a subsea cable from Del Norte to Humboldt. The second example is in Alternative 25.8a, where a subsea cable would connect Humboldt to the Martin substation in the San Francisco Bay Area. The Strategic Plan should include additional study and analysis on the various alternatives and their associated benefits and potential impacts of transmission facilities either sited on land or in the form of a subsea cable.

C. Transmission and distribution planning must ensure adequate capacity for the Humboldt Bay Heavy Lift Marine Terminal to be a zero emission terminal. In January 2024 the Humboldt Bay Harbor, Recreation, and Conservation District (District) adopted a green terminal resolution.⁴² An electric and zero emissions project is a priority for surrounding communities. Accomplishing this will require considerable and timely investments in the local grid and a connection to wind power to support zero emissions goals. The Strategic Plan should include

⁴⁰ California Independent System Operator (ISO). April 2024. Draft 2023-2024 Transmission Plan. https://www.caiso.com/InitiativeDocuments/DRAFT_2023-2024_TransmissionPlan.pdf

⁴¹ See, California Energy Commission (2023). *Resolution Committing to Support California Tribal Energy Sovereignty*.

⁴² Humboldt Bay Harbor, Recreation, and Conservation District, Resolution No. 2024-01, a Resolution Committing the District to Developing and Adopting a Green Terminal Strategy and Roadmap for the New Heavy Lift Multipurpose Terminal to Support the Offshore Wind Industry, online at <https://humboldt-bay.org/sites/humboldt-bay.org/files/Resolution%202024-01%20Adopting%20a%20Green%20Terminal%20Strategy.pdf>

strategies to ensure that there is adequate electric infrastructure for the District to make the near and long-term investments necessary to future-proof the terminal so it can operate as a zero-emission facility when the OSW is available to serve the facility. There should be coordinated and concurrent planning with Pacific Gas & Electric, California Public Utilities Commission, the Independent System Operator, the District, Tribal Nations and impacted communities.

- D. Additional consideration and study should be given to connecting the transmission network between Southern Oregon and the Redwood Region.** In many of the Alternatives, there are few transmission projects being considered to provide greater connectivity between Southern Oregon and the Redwood Region. Moreover, the few examples that do, such as Alternatives 12.4b and 25.8a, connect Simi Valley with Del Norte and deliver power to the corridor between Humboldt and Fern Road. In addition to these projects in both Alternatives, we would suggest further consideration and study for other projects, and would urge the ISO to collaborate with PacificCorp. An alternative to be considered and studied could be an on-land transmission project between Humboldt and Del Norte, with particular attention to increasing electrical capacity of regions along the route, which could spur potential collaboration with local communities and Tribal Nations that reside between both areas and face challenges relating to resilience, reliability, and access.

Chapter 9: Transmission Planning and Corridor Designation Must Center Local Communities and Tribal Nations to Address Socioeconomic Needs and Maximize Potential Benefits.

We agree with the recommendations in the Strategic Plan, particularly the need to foster regional bulk transmission planning efforts to maximize the potential benefits from offshore wind development. We also commend the CEC for its leadership in its various successful processes, such as the Renewable Energy Transmission Initiative (RETI), the Desert Renewable Energy Conservation Plan (DRECP), and the stakeholder-led San Joaquin Valley Identification of Least-Conflict Lands study.

However, we remain concerned that there is no mention of how and when local communities and Tribal Nations will be able to meaningfully participate in the decision-making process, especially for impacted communities that are located in areas where this infrastructure would be sited and constructed. We incorporate by reference herein our Chapter 8 comments for the Strategic Plan, and provide the following recommendations for Chapter 9:

- A. Center and prioritize participation from local communities and Tribal Nations.** In most, if not all, regulatory processes, local and Tribal voices are often lacking. While we appreciate the CEC's leadership in processes such as RETI and the DRECP, it is likely that many local and Tribal communities would not be able to participate in a new regulatory process given capacity constraints and other barriers. Regulatory processes relating to siting, permitting, planning, and development must start with Tribal Nations, who have fundamental rights as sovereigns, and local communities. They should have the information and resources they need to be able to meaningfully participate and be a part of the regulatory and decision-making process.
- B. Assess and prioritize non-wire alternatives and local resources.** We suggest that non-wire alternatives be considered in tandem with transmission projects, such as demand response and storage-as-a-transmission-asset (SATA). We agree with the Strategic Plan that storage can minimize curtailment, improve reliability, and optimize offshore wind by complementing

transmission. Some of these alternatives, such as storage, can also be sited locally in impacted communities to provide local benefits such as resiliency and reliability.

- C. Distribution system planning is missing across the Strategic Plan.** To maximize the potential benefits from offshore wind development, the CEC must include distribution system planning in its Strategic Plan. In the Redwood Region, many communities lack electricity access, broadband, and other necessities that may impact quality of life; many more have inadequate distribution system infrastructure, and therefore face outages during extreme weather events. Distribution system planning must also be considered in tandem with distributed energy resources, such as local solar, storage, and microgrids to minimize costly local grid upgrades and foster localized community benefits. Without distribution system planning for the Redwood Region and its local communities, there is a high risk that the offshore wind generation will leave the region through the transmission system, ultimately maximizing benefits for the bulk system rather than the people most impacted by the development. The Redwood Region must be positioned to thrive by correcting years of underinvestment, and must benefit from offshore wind power that is adjacent to their homes, schools, agencies and businesses.

Chapter 10: Offshore Wind Permitting Must Maintain Transparency, Timely Sharing of Information, Uphold Tribal Sovereignty, and Implement Proactive Engagement with Impacted Communities.

We support the recommendation to implement a coordinated permitting approach for offshore wind development; however, while we understand the need for an Ocean Renewable Energy Action Team (REAT) and a Renewable Energy Policy Group (REPG), proactive engagement with the public, particularly local communities, and early and frequent consultation with Tribal Nations along with Tribal decision making must be embedded into this process.

This is especially critical based on previous lessons learned relating to overly ambitious and unrealistic timelines. The draft Strategic Plan notes that “some AB 525 deadlines have already proved incompatible with the time required to properly conduct research, outreach, and planning”. Therefore, while there are benefits to a coordinated approach, such as efficiency, consistency, accessibility and alignment on connected actions, proactive collaboration with local communities and Tribal Nations must be at the forefront. In addition, we recommend the following for the Strategic Plan:

- A. A coordinated permitting process with an Ocean REAT and REPG structure must fully comply with CEQA and NEPA.** We agree with comments from other parties in their support for the development of joint environmental documents under CEQA and NEPA, and we agree with the benefits of a programmatic approach. Moreover, we agree that there is efficiency in preparing both documents at once, that there will be more consistent conclusions, and that it’s easier for parties to participate and comment on one process rather than two. However, we want to uplift concerns in combining both processes as it relates to NEPA and CEQA having different requirements. We emphasize that any joint documents must clearly distinguish between and fully comply with CEQA and NEPA. For example, the Strategic Plan appropriately acknowledges that NEPA has a more stringent treatment of alternatives, and CEQA requires the mitigation of impacts whereas NEPA does not.

- B. A programmatic approach offers key procedural benefits.** We agree with comments from parties that a “programmatic approach offers valuable opportunities for stakeholder engagement” and that it “would enable a more comprehensive assessment of the cumulative impacts of multiple offshore wind projects and allow for the consideration of potential interactions and amplification effects between projects on ecosystems, wildlife, and coastal communities.” In addition, we agree with comments from the Yurok Tribe that a programmatic approach “can consider the geospatial component of various uses and environmental needs at a planning stage where such uses and needs can be protected, rather than at the project stage when the location of an individual project has already been proposed.”⁴³
- C. REAT and REPG must develop Tribal co-management structures and consultation processes.** As we have described throughout these comments, Tribal decision making and authority throughout the planning, permitting, operations, and decommissioning processes is critical to approaching offshore wind in a more just, regenerative way and deliver on state and federal sovereignty and equity commitments. We recommend expanding the structure and membership of REAT and REPG to include Tribal Nations as part of the leadership and decision making team(s). State and federal agencies participating in REAT and REPG must uphold tribal sovereignty and fulfill their statutory responsibility with respect to Tribal Nations. This must include a co-management and co-ownership structure with financial resourcing for management/ownership responsibilities . The Strategic Plan should discuss opportunities for Tribal co-ownership and co-management beyond the section on the Bears Ears Intergovernmental Cooperative Agreement.

Additionally, consultation processes must be developed in partnership with Tribal Nations, and must incorporate best practices for early, meaningful, and effective consultation, including early notification. The consultation process would be independent of, and in addition to, any public process required by federal or state statute, or by any member of the REAT and REPG. This recommendation is aligned with the Strategic Plan’s acknowledgment that “agencies would also need to implement different requirements for consultation with Native American Tribes.”

- D. Opportunities for public engagement should be beyond administrative and regulatory milestones.** Local communities and the public should reap the benefits of enhanced coordination between agencies and greater efficiency by providing additional opportunities for public engagement that are independent of any public process required by federal or state statutes. The benefits of efficiency and enhanced coordination should not be solely based on faster project approvals. Participation and engagement from local communities could be formalized by a stakeholder-led group that would engage in pre-application processes, similar to the Bay Restoration Regulatory Integration Team (BRRIT), and can serve as a “permitting review group”.
- E. Further information about the REAT and REPG is needed.** The Strategic Plan should provide further information about the REAT and REPG structure, decision-making process, and timelines. This information should include the potential roles of each agency, identification of state- or federally-required permitting, and key progress checkpoints. The REAT and REPG should also be required to publish detailed meeting minutes, decisions made, and other pertinent information

⁴³ Joseph, James (Yurok Tribe). May 2023. “Comment on April 28 Permitting Roadmap.” TN 250082. Available at <https://efiling.energy.ca.gov/GetDocument.aspx?tn=250082&DocumentContentId=84800>.

that would keep the public reasonably informed of ongoing progress, milestones, and opportunities for participation and leadership.

Conclusion

Thank you again for the opportunity to provide comments. Please do not hesitate to contact us if you have any questions or if you would like to discuss this comment letter.

Sincerely,

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