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# Elk Valley Rancheria, California



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April 16, 2025

**VIA EMAIL & POSTAL SERVICE**

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California Energy Commission  
ATTN: Sierra Graves  
715 P Street  
Sacramento, CA 95814

Re: Assembly Bill 3 Elk Valley Rancheria, California Tribal Consultation  
Response; Seaport Readiness and In-State Manufacturing Strategy – Focus on  
Crescent City Harbor

Dear Ms. Graves:


The Elk Valley Rancheria, California, a federally recognized Indian tribe with ancestral territory in Del Norte County, submits these comments in response to the California Energy Commission's (CEC) implementation of Assembly Bill (AB) 3 (2023), the California Offshore Wind Advancement Act. We appreciate the Commission's continued efforts to ensure California meets its clean energy goals and express our support for responsible offshore wind development that aligns with tribal sovereignty, environmental justice, and economic equity.

## **I. IMPORTANCE OF CRESCENT CITY HARBOR TO OFFSHORE WIND DEVELOPMENT**

The Crescent City Harbor, located in Del Norte County, presents a unique and underutilized opportunity for inclusion in California's offshore wind infrastructure planning. We urge the CEC to consider Crescent City Harbor as a key regional asset for several reasons:

- Proximity to Humboldt Wind Energy Area: While Eureka has been identified as a primary port of interest, Crescent City offers a viable supplemental or secondary port to support staging, laydown, and maintenance of offshore wind components for the North Coast region.



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- **Lower Congestion, Faster Mobilization:** Compared to busier seaports in the Bay Area and Southern California, Crescent City Harbor offers fewer traffic constraints and faster vessel turnaround, which could prove critical for project timeliness.
  - **Available Land and Infrastructure:** The Crescent City Harbor District owns lands with potential for light industrial and port-adjacent uses, including opportunities to expand upland support infrastructure.
  - **Economic Revitalization Potential:** Del Norte County is among the most economically challenged regions in the state. Investment in offshore wind activities could significantly support workforce development and economic diversification.


## **II. ALIGNMENT WITH AB 3 REQUIREMENTS – TRIBAL COLLABORATION AND RESOURCE PROTECTION**

AB 3 requires that seaport readiness planning include collaboration with tribal governments and minimize adverse impacts to natural and cultural resources. The Elk Valley Rancheria urges the CEC to ensure that Crescent City Harbor is evaluated using siting criteria that incorporate the following:


- **Tribal Consultation Protocols:** The Tribe requests early, regular, and government-to-government consultation with the CEC and other agencies in assessing port feasibility, infrastructure development, and offshore wind supply chain siting in or near tribal ancestral territories.
- **Cultural Resource Protection:** Seaport upgrades or construction must avoid impacts to archaeological sites, cultural landscapes, and places of historic and spiritual importance to the Tribe. A tribal cultural resource survey should be integrated into all port expansion feasibility assessments.
- **Ecological Sensitivity:** The Tribe supports marine and coastal environmental stewardship. Crescent City is located near sensitive ecosystems, including marine mammal habitats, fisheries, and intertidal areas. Offshore wind-related port development must account for these vulnerabilities, and the Tribe supports development that incorporates best practices in environmental mitigation and adaptive management.

## **III. IN-STATE MANUFACTURING STRATEGY AND TRIBAL BENEFITS**

As part of the AB 3 mandate to evaluate 50% and 65% in-state manufacturing of offshore wind components, the CEC should consider:

- **Locating Assembly or Light Manufacturing in Crescent City:** The low cost of land, high local unemployment, and community support for new industries make Crescent City an attractive location for siting manufacturing or component assembly facilities, particularly for modular parts, electrical systems, or maintenance vessels.
  - **Tribal Workforce Development:** We urge the CEC to coordinate with tribal workforce programs and community colleges to create pathways for tribal citizens to participate in
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offshore wind careers. This includes training in welding, electrical systems, vessel operations, and port logistics.

- Community Benefit Agreements: Any offshore wind port-related development at Crescent City Harbor should incorporate robust community benefit agreements that include measurable commitments to tribal hiring, apprenticeship pipelines, and contracting with tribally owned businesses.

#### **IV. RECOMMENDATIONS**

1. Include Crescent City Harbor in all seaport readiness and feasibility analyses under AB 3 and AB 525.
2. Develop siting criteria in partnership with tribes that prioritize cultural resource preservation, environmental stewardship, and tribal economic inclusion.
3. Dedicate funding and technical assistance to support smaller ports such as Crescent City in preparing for offshore wind infrastructure investments.
4. Incorporate tribal perspectives in workforce and manufacturing studies required under AB 3 to ensure equitable participation in the offshore wind economy.

#### **Conclusion**

Crescent City Harbor has the potential to play an important role in California's offshore wind strategy while also advancing the State's commitments to equity, tribal inclusion, and economic revitalization. We respectfully request the California Energy Commission incorporate the considerations outlined above and initiate formal consultation with the Elk Valley Rancheria and other affected tribal governments in the North Coast region.

Respectfully submitted,



Dale A. Miller  
Chairman

cc: Elk Valley Tribal Council  
COO  
Del Norte County Board of Supervisors  
City Council Crescent City

