

DOCKETED

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Offshore wind

Additional submitted attachment is included below.



July 31, 2020

The California Energy Commission
1415 T street
Sacramento, CA. 95814

RE: Docket number: 17- MISC-01
Project title- California Offshore Renewable Energy
TN#: 232933

Operating Engineers Local 3, Environment California, Los Angeles CleanTech Incubators and Brightline Defense support the development of offshore wind off the coast of California. Offshore wind technology offers great benefits that will not only energize local communities but will improve the energy grid while protecting against the worsening impacts of climate change. In addition, it will reduce air pollution in areas traditionally burdened with poor air quality and create quality jobs up and down the state.

We urge the commission to move ahead with The Bureau of Ocean Energy Management (BOEM) and proceed with site identification in the Humboldt and Morro Bay Call Areas to prepare for auctions in 2021.

In order to move forward, we implore the California Energy Commission and the state of California to study the environmental, public health and economic benefits associated with the development of offshore wind off the coast of California.

Background:

In 2018 California adopted Senate Bill (SB) 100 (de Leon), ensuring that California generates 100% carbon-free electricity by 2045. California's load-serving entities will need 25-37 gigawatts (GW) of new renewable energy and storage to meet the state's carbon reduction goals by 2030 and up to 150 GW to achieve SB 100 targets in 2045. The best way to meet these demands is through a diverse composition of clean energy technologies, energy efficiency and energy conservation.

Five key points to consider:

1. **Labor Opportunities:** Buildout of floating offshore wind off the coast of Morro Bay and Humboldt Bay (approximately 3 GW by 2030) could create thousands of much-needed jobs in construction, operations, maintenance, and supporting industries in the next decade. This economic development will occur primarily in San Luis Obispo County, where there are opportunities to re-deploy Diablo Canyon power plant workers, and in traditionally underserved Humboldt County, which is eager to support a new industry and has a strong need for jobs. In the Central Coast, offshore wind could take advantage of transmission

capacity available and soon to be available following closure of the Diablo Canyon and Morro Bay power plants. We encourage the state to study the economic opportunities that exist with offshore wind.

2. Environmental Justice: Offshore wind delivers environmental justice for frontline communities disproportionately burdened by pollution. By moving to a clean source of renewable energy that can be built at scale, we can phase out California's reliance on fossil fuel peaker power plants, which are a source of NOX and other pollutants. Continuing its prior work on power plant siting, the state should look at the air quality issues that stem from such fossil fuel plants and how to retire the oldest, dirtiest plants with this cleaner energy. In addition, the state should insist upon coordination with community partnerships and local workforce development systems to create entry-level jobs for offshore wind that put local underemployed and unemployed communities to work.
3. Environmental Impacts: Moving to offshore wind will help stave off the worst impacts of climate change. The state needs technologies that will move us toward clean energy. Specifically, we want the state to set a goal of 3 GW of offshore wind by 2030 and 10 GW by 2040. In addition, we want the state to ensure that needed research is carried out and mitigation strategies are designed for the potential impacts of offshore wind development on fish, marine mammals and seabirds. This work should be carried out proactively, with the intent of avoiding potential regulatory bottlenecks among local, state and federal agencies. At this point, we don't see the value of disturbing marine sanctuaries or marine protected areas.
4. Transmission: Begin long-term planning for the transmission infrastructure needed for offshore wind development. In the near term, prioritize federal economic stimulus monies to fund local transmission facility upgrades, enabling the development of offshore wind farms in Humboldt County and Santa Barbara County.
5. Deep-water Ports: Begin long-term planning for the modernization and upgrading of seaports for offshore wind manufacturing, assembly, operations and maintenance. As an initial step, the planning work should include a ground-truthed survey of space availability and governance in ports statewide. Also, in the near term, the Port of Humboldt Bay should be prioritized for federal economic stimulus funding.

We respectfully file these comments.

Thank you

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