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on the Draft Conceptual Permitting Roadmap

Additional submitted attachment is included below.



February 10, 2023

California Energy Commission
Docket number 17-Misc-01
715 P Street
Sacramento, CA 95814

Re: The permitting roadmap for offshore wind energy development off the coast of California.

Dear California Energy Commission,

We appreciate the opportunity to submit these comments in response to the preliminary reports and workshop of the California Energy Commission on the preliminary permitting roadmap for offshore wind energy development off the coast of California.

This coalition is made up of labor, environment, business coalitions, and environmental justice organizations standing together in support of California going big on offshore wind. This coalition is excited by the potential of offshore wind development to create thousands of family-sustaining quality jobs and deliver large-scale clean energy to California. Continued thoughtful policies and engagement of local communities can bring further community benefits.

Further Clarity on Environmental Permitting and Considerations Should Be Included

The conceptual permitting roadmap should include further clarity on environmental permitting and assessment opportunities. As an exciting, large-scale energy development, related environmental monitoring and adaptive management practices can play a significant role in maintaining California's abundant natural resources for future generations. The conceptual permitting roadmap should provide further clarity on how the identified California agencies will coordinate and administer environmental permitting and studies. As outlined in the conceptual roadmap, case studies on previous large scale projects can provide insight on the role of environmental monitoring and opportunities for improvement. Clarifying the opportunities of environmental permitting, monitoring, and adaptive management will also open up opportunities for engagement by Tribes and other interested parties.

Further Clarity on Strategies to Protect Communities, Wildlife, and the Environment Should Be Included

The conceptual permitting roadmap should include further clarity on the goals on environmental permitting and assessment. This should include responsible development practices that (1) avoids,

minimizes, mitigates, and monitors for adverse impacts on wildlife and habitats; (2) minimizes negative impacts on other ocean uses; (3) includes robust consultation with Native American Tribes and communities; (4) meaningfully engages local governments and stakeholders from the outset; (5) includes comprehensive efforts to avoid negative impacts to underserved communities; and (6) uses the best available scientific and technological data to ensure science-based and stakeholder informed decision making. The permitting roadmap should specify the requirements that offshore wind developers must meet in order to comply with these practices, including but not limited to conditions to reduce the risk of entanglement of marine mammals, sea turtles, sharks, and diving birds; conditions to improve the understanding of risks to birds and bats; conditions to reduce the introduction of invasive species; conditions related to improving adaptive management and understanding of cumulative impacts; conditions to improve data transparency; and conditions to ensure environmental mitigation and monitoring strategies are informed by robust consultation with interested Native American Tribes and impacted communities.

Further Identification of Opportunities for Public Engagement Should Be Included

The conceptual permitting roadmap includes important information on the coordination of state agencies but should include further markers on the stages of the permitting process and opportunities for community feedback. The current conceptual roadmap is vague as to when Tribes and interested parties should expect to be able to offer feedback, attend workshops, and engage deeply in California Energy Commission draft publications. Ample advanced notice and information is important for constructive and impactful analysis for communities local to offshore wind development, Tribes, and other stakeholders. While recognizing the conceptual permitting roadmap is an evolving document, further information should include approximate timelines, estimated feedback periods, and further transparency on when to expect opportunities for workshops and engagements.

With the close of the first offshore wind auction in California last year, there is significant opportunity and excitement to bring this new industry to the state. There is incredible potential to bring significant benefits and quality, family-sustaining jobs. The wide-scale, generational impacts of offshore wind on local communities should not be overlooked and the conceptual permitting roadmap should identify further opportunities to deliver benefits and for community engagement. The AB 525 (Chiu, 2021) report process is a critical opportunity to identify California's goals and role in bringing transformational change to California while setting the stage for further equity-driven, environmentally responsible, and high-road development.

Signed,

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