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*Comment Received From: Golden State Wind  
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**Golden State Wind AB525 Draft Permitting Roadmap Comments**

*Additional submitted attachment is included below.*

February 10, 2023

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

Subject: Assembly Bill 525 Draft Permitting Roadmap

To whom it may concern,

Golden State Wind appreciates the opportunity to comment on the Draft Assembly Bill 525 Report: Developing a Permitting Roadmap for Offshore Wind Energy Development off the Coast of California (“Draft Roadmap”). We gratefully acknowledge the California Energy Commission (“CEC”) and other state agencies for their substantial time and efforts to prepare the Roadmap, and for their broader leadership on offshore wind.

Golden State Wind, a 50/50 joint venture of Ocean Winds (“OW”) and the Canadian Pension Plan Investment Board, is provisional winner of Lease Area OCS-P 0564 in the Morro Bay Wind Energy Area off the Central Coast. OW has more than 10 years of experience in floating offshore wind, most notably through the development and operation of Windfloat Atlantic, the world’s first fully commercially operational floating offshore wind farm. OW has a substantial portfolio of floating projects in Europe and South Korea and is ideally positioned to bring this technology to California.

With offshore wind, California has the opportunity to participate in and benefit from a growing global industry at the intersection of innovation, manufacturing, and clean energy. Most importantly, offshore wind presents a huge potential to create local jobs, advance towards a carbon-free electric system, and address the threat of climate change. The successful completion of the Bureau of Ocean Energy Management’s (“BOEM”) December 2022 Pacific Wind Lease Sale is an important accomplishment, and significant step forward for the offshore wind industry. A permitting roadmap that establishes a clear, predictable, coordinated, and timely state permitting process, while ensuring robust, science-based environmental review is essential to realizing these benefits.

As the Draft Roadmap describes, the issuance of leases formally initiates the site assessment phase and the commencement of a wide array of activities that include metocean data collection, geological and geophysical surveys, and surveys of species and habitats in both offshore and onshore environments. These activities require advance planning to be permitted and executed under a clearly defined regulatory framework and involve a significant commitment of human and financial resources. Therefore, it is critical that the state move quickly to define a Final Roadmap that includes, as specifically directed by AB 525 (1) a goal for the permitting timeframe (2) clearly defined local, state, and federal agency roles, responsibilities, and decision-making authority, and (3) interfaces with federal agencies, including timing, sequence, and coordination with federal permitting agencies, and coordination between reviews under the California Environmental Quality Act (CEQA) and the federal National Environmental Policy Act of 1969, as amended (NEPA).

The Draft Roadmap is based on a solid foundation of underlying assumptions which include relying reliance on interagency memoranda of understanding (“MOU”) and implementing the Roadmap under existing laws.

We strongly recommend that the Final Roadmap:

- Define a lead CEQA agency that has the experience and understanding required to prepare a legally and technically sufficient CEQA document.
- Describe the specific roles and responsibilities of each agency involved in the permitting process.
- Establish a detailed sequence and schedule of approvals that identifies dependencies on prior approvals.
- Assume as a key design criterion that that state and federal permitting reviews are concurrent and that the state permitting process is timed to conclude at the same time as the federal process.
- Establish a forum to efficiently and effectively resolve any issues that may arise during that process.

While it is essential to moving quickly to establish the Final Roadmap as soon as possible, it will be equally if not more important that California establishes clear authority to oversee its successful implementation. This clear state mandates will ensure a robust timely, coordinated, and science-based offshore wind permitting process.

Golden State Wind wishes to once again thank the CEC and other state agencies for their efforts to prepare the Draft Roadmap and for their broader leadership on offshore wind. We look forward to continuing to work together to deliver offshore wind's clean energy, climate, and economic benefits to California.

Sincerely,

A handwritten signature in black ink that reads "Tyler Studds". The signature is written in a cursive, slightly slanted style.

Tyler Studds  
Golden State Wind  
Chief Executive Office