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Coastal Commission staff comments on AB 525 Permitting Roadmap

Additional submitted attachment is included below.

CALIFORNIA COASTAL COMMISSION

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June 22, 2023

California Energy Commission
715 P Street
Sacramento, CA 95814
Submitted via docket log 17-MISC-01

Subject: Comments on Assembly Bill 525 Offshore Wind Energy Permitting Roadmap

Dear Chair Hochschild and Honorable Commissioners,

Thank you for your ongoing collaboration with the Coastal Commission and the opportunity to comment on the offshore wind energy permitting roadmap. Assembly Bill (AB) 525 charges the Energy Commission with developing a permitting roadmap that describes the timeframes and milestones for a coordinated, comprehensive, and efficient permitting process for offshore wind facilities and associated electricity and transmission infrastructure off the coast of California.

The Coastal Commission (Commission) plays a unique role in permitting offshore wind. The Commission serves as the only California agency with federal Coastal Zone Management Act review authority over offshore energy leasing, development, and operation activities on the outer continental shelf. Under this authority, the Commission performs two reviews of offshore wind development, one before leasing and one before approval of the construction and operations plans. Under the Coastal Act, the Commission also has direct permit authority over project components within state waters and any onshore work associated with offshore wind energy development would either fall under the Commission's original jurisdiction or would likely be appealable to the Commission after consideration by a local government under a certified local coastal program.

Coastal Commission staff support responsible development of offshore wind in California, including coordinating with our partner agencies in permitting and environmental review. We regularly coordinate with our partner agencies, including the California State Lands Commission, through joint review panels and other means to review offshore projects. We support the Energy Commission staff's recommendation in the permitting roadmap to move forward with a coordinated permitting and environmental review approaches in the AB 525 strategic plan. Pursuing a coordinated approach leverages the expertise of each agency to develop an efficient and comprehensive review of offshore wind projects that will ensure the sustainability of California's coastal resources, fishing industry, and coastal communities. Furthermore, this type of approach can be implemented immediately and will not require any statutory changes. In contrast, we agree with Energy Commission staff's assessment that a consolidated approach to the state regulatory process would be unlikely to provide benefits in efficiency; it would require statutory changes and has the potential to

duplicate current state efforts and expertise and increase permitting delays and challenges.

Although we have a good sense of what the coordinated approach might look like, there is more work to do to ensure we are minimizing regulatory timelines and providing transparency for lessees. Coastal Commission staff look forward to working with staff from our sister agencies, including the Energy Commission, to further refine and develop the coordinated permitting and environmental review approach to be used for offshore wind and describing this recommendation in the AB 525 Strategic Plan.

We thank you, again, for the opportunity to comment, and we look forward to continuing our work with you as the AB 525 Strategic Plan is developed. If you have questions about this letter, please contact Holly Wyer at holly.wyer@coastal.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kate Huckelbridge". The signature is written in a cursive style with a long horizontal stroke at the end.

Kate Huckelbridge
Executive Director
California Coastal Commission