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OSW Coalition Comments on Draft AB 525 Report

Additional submitted attachment is included below.



April 22, 2024

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

Re: Comments on Draft AB 525 Offshore Wind Strategic Plan

Dear Chair David Hochschild and Commissioners,

We appreciate the opportunity to submit comments in response to the publication of the draft AB 525 Offshore Wind Strategic Plan. This coalition is made up of environmental, environmental justice, and research organizations standing together on the importance of offshore wind to California's clean energy goals and the opportunities it can provide.

Floating offshore wind can provide large-scale renewable energy that is essential to transition away from fossil fuel reliance. The increasing intensity and frequency of wildfires, drought, and extreme weather are evidence of the urgency to decarbonize the electric power sector. There is also an urgency to align California's state agencies and permitting authorities for a robust planning process to mitigate and avoid potential impacts of offshore wind.

We appreciate the hard work of the commissioners and staff in putting together the interim and draft AB 525 reports while coordinating between many agencies and jurisdictions. The AB 525 Offshore Wind Strategic Plan will provide an important roadmap to help realize the potential of California offshore wind while also understanding the potential impacts to California's workforce, biodiversity, and impacted communities.

We respectfully offer the following high-level comments in response to the draft strategic plan.

Transparency and Knowledge Sharing is Key

Key to the equitable and responsible development of California offshore wind, port infrastructure, and necessary transmission is the gathering of pertinent information and sharing of information with the public. This includes but is not limited to mapping of benthic habitats, natural resources research, the progress of offshore wind development, and implementation of workforce development programs. In the implementation of the AB 525 Offshore Wind Strategic Plan, stakeholders should be provided ample information to effectively engage in public comments and engagement strategies.

Affirming Workforce Development and Jobs Benefits

This coalition appreciates the chapters in the AB 525 Offshore Wind Strategic Plan that highlights the deep needs for workforce development to meet the construction and operations needs for the California offshore wind planning goals of 25 GW by 2045. To achieve these goals, California will need to invest more in workforce training and education in the construction and operations jobs. The draft AB 525 Offshore Wind Strategic Plan should further its recommendations to provide clarity on the amount and types of investments necessary to meet the job requirements and needs in partnership with labor unions and training providers.

Heavy Lift Terminals and Port Improvements Should Invest in Green Infrastructure

Green infrastructure for ports is essential to reduce climate and air quality impacts to near-port communities. California's offshore wind strategy should not incentivize the further development and use of traditional dirty energy sources. The energy used to build offshore wind should be clean energy. Therefore, port related equipment and improvements should be electrified including clean drayage trucks. The AB 525 Offshore Wind Strategic Plan should include further analysis of current port electrification progress and identify it as a priority for future port development such as in the Waterfront Facilities Improvement Plan.

Identification of Offshore Wind Impacts on California's Ocean Environments

The signees appreciate the level of detail included in the identification of offshore wind impacts on ocean environments and the consideration of the Bureau of Ocean Energy Management's Programmatic Environmental Impact Statement process. The AB 525 Offshore Wind Strategic Report should further clarify the roles of the state agencies in environmental monitoring and regulatory powers compared to federal processes. Monitoring offshore wind's potential impacts to ocean environments before, during, and after development and operations activities will be crucial to ascertain impacts and generate recommendations for adaptive management.

Additional Analysis of Clean Energy Benefits are Necessary

Offshore wind has the potential to generate significant renewable energy, increase statewide renewable energy reliability, and reduce California's dependence on fossil fuel energy sources. As outlined in the SB 100 report, offshore wind in combination with the development of other renewable energy sources can help California achieve its 100% renewable energy and zero carbon resources goals. In addition to the climate benefits, the reduction in use of fossil fuel energy sources will also benefit Disadvantaged and underserved communities near natural gas peaker plants and oil fields. The AB 525 Offshore Wind Strategic Plan should include further discussion on the importance that offshore wind energy generation can be in achieving California's overall renewable energy goals.

We appreciate the California Energy Commission and other state agency staff members who put together this thorough report. We look forward to working with you to implement the recommendations of the strategic plan.

Sincerely,

Eddie Ahn

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