



**Remarks by *Offshore Wind California* to Workshop by California Energy Commission (CEC) on
Assembly Bill (AB) 525: Draft Conceptual Permitting Roadmap for California Offshore Wind Energy**

December 19, 2022

I'm Adam Stern with *Offshore Wind California (OWC)*, a trade group that represents the offshore wind industry in our state. I want to associate our thoughts with that of my colleague, Varner Seaman at *American Clean Power (ACP)*. We echo many of the statements that he made earlier during this public comment period.

We strongly encourage the State, acting through the Governor's Office, to develop the required interagency agreements and the state and federal Memoranda of Understanding (MOUs) for offshore wind permitting as soon as possible. One way to expedite this might be to draw upon the successful MOUs that were arranged during the Schwarzenegger and Brown administrations for onshore renewables, but adapting them to the unique challenges associated with offshore wind and the different agencies that have responsibilities for this.

I believe Eli Harland of CEC alluded to this in explaining the conceptual framework. The MOU should involve commitments from California agencies to meet performance schedules developed in a way that are aligned with FAST-41, ideally with the CEQA analysis progressing in concert with the required NEPA analysis. The MOUs should address, among other milestones, the timing of the federal and state environmental reviews of both the lease sale and project-specific proposals, including Site Assessment Plans, Construction and Operations Plans, Coastal Development Permits, CZMA consistency determinations and certifications, State Lands Commission leases, and related consultation requirements.

There also should be a framework that allows for swift elevation of issues to policy-level officials, including in the Governor's Office, with a reporting structure that helps keep the process moving. Specific issues that need to be addressed include the alternatives analysis, mitigation measures, and other ways to avoid conflicting or duplicative measures, ensuring that the agencies compare notes and coordinate their analyses and conclusions regarding controversial issues, such as potential impacts to fisheries.

Representing *Offshore Wind California*, I want to applaud the work of all of the staff at CEC and the other agencies that have worked on this document. We recognize that it's an ongoing process. We look forward to working with you to ensure that the conceptual framework turns into an actionable framework to realize the promise of offshore wind.

Thank you very much.

Adam Stern, Executive Director, [Offshore Wind California](#) (OWC), a trade group of offshore wind developers and technology companies

For more information, see OWC's [California Offshore Wind Industry Report – November 2022](#)