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Sanctuary Advisory Council
Monterey Bay National Marine Sanctuary
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Monterey, CA 93940
(831) 647-4201

August 21, 2020

Ms. Karen Douglas, Commissioner
California Energy Commission
1516 9th St,
Sacramento, CA 95814

RE: TN 231989, Notice of Availability of Outreach on Additional Considerations for
Offshore Wind off the Central Coast of California; Monterey Bay National Marine Sanctuary "Discussion Area"

Dear Commissioner Douglas,

On behalf of Monterey Bay National Marine Sanctuary (MBNMS) Advisory Council (AC), I wish to thank you for providing the opportunity to comment on the Notice of Availability of Outreach on Additional Considerations for Offshore Wind off of the Central Coast of California ("Notice of Availability"). The MBNMS Advisory Council (AC) is a community-based body that provides a public forum for consultation on resource-management issues. This letter constitutes our comments on the above-referenced project.

This project represents the California Energy Commissions' and the federal Bureau of Ocean Energy Management's (BOEM) interest in developing offshore wind (OSW) energy potential. Specifically, there are the two Central Coast "Call Areas" proposed by BOEM, subject to possible modification. One of the potential modifications is the addition of approximately 90 square miles within the southwest corner of MBNMS. On July 16, 2020, the AC held a virtual public meeting to hear about the planning and decision-making process to consider offshore wind development in the Central Coast of California. The AC very much appreciates your personal participation in the presentation.

"The council is an advisory body to the Sanctuary Superintendent. The opinions and findings of this publication do not necessarily reflect the position of the Monterey Bay National Marine Sanctuary and the National Oceanic and Atmospheric Administration."

Monterey Bay National Marine Sanctuary

The Advisory Council is composed of 21 federally appointed representatives from government agencies, local institutions, and user groups concerned with the resources of the Monterey Bay National Marine Sanctuary. The Council advises the Sanctuary Superintendent on matters of policy and provides a link between the community and Sanctuary management.

Following the presentation, the AC heard public comment on the Morro Bay Call Area, the additional "North/North A" and "South/South A", and the "Discussion Area" which lies within the boundaries of the Monterey Bay National Marine Sanctuary. The SAC then considered this information and commented, largely about the Discussion Area inside the boundaries of the Sanctuary.

The following summarizes the AC's comments from the July 16 meeting:

- The Monterey Bay National Marine Sanctuary Advisory Council supports the State of California's climate goals of clean, sustainable, renewable energy, and reduction of Greenhouse gas emissions.

- MBNMS is not a place for large industrial development like a wind farm. A long history of policies and regulatory actions supports this conclusion. The precedent it would set could be counterproductive to national marine sanctuaries.

- There are both known and unforeseen environmental consequences to OSW projects. These include: interference with physical habitat; wildlife migrations; wildlife entanglement; hazards to navigation; potential impacts to cultural heritage sites including shipwrecks and sacred native artifacts; effects of electromagnetic fields; noise pollution; and disturbances to breeding and feeding grounds; and, seabird mortality, among others.

- The technology is not fully developed nor proven in these depths and conditions.

- Being closer to shore, the turbines will be easily visible from shore. This is not the experience most people would anticipate or welcome when visiting a national marine sanctuary. These decisions could cause negative socio-economic impacts to diverse ocean users and local coastal communities that rely on recreation and tourism.

- It is likely that the OSW farm(s) will prevent commercial fishing in adjacent waters. Being closer to shore, there would be increased negative socioeconomic effects on Morro Bay and Avila fishermen and their communities.

- There appears to be other areas off the California coast that are more suitable for OSW development to address the state's goal of increased clean energy production.

- The current established International Maritime Organization and US Coast Guard shipping lanes in the proposed areas would be in direct conflict with this project. MBNMS recently worked in collaboration with NMFS, NOAA and USCG regarding whale strikes along the California coast and in the proposed areas. It is difficult to imagine how more congestion in this area would support such a project while maintaining the current commercial shipping, commercial fishing as well as protecting recent efforts to reduce whale strikes, sanctuary sea bottom and surface habitats from significant habitat disturbances.

There were no AC or public comments that supported using the Discussion Area within the MBNMS for a wind farm. Resource protection is the fundamental goal of the MBNMS and the AC.

As this process continues, we expect further consultation and opportunity to comment.

The Monterey Bay National Marine Sanctuary Advisory Council appreciates the public discussions, presentations, background information and the opportunity to review the proposed Wind Farm Project.

Thank you for considering these comments.

Sincerely,

Brian Nelson, Chair
Monterey Bay National Marine Sanctuary Advisory Council