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<b>Project Title:</b>	California Offshore Renewable Energy
<b>TN #:</b>	234963
<b>Document Title:</b>	Monterey Bay National Marine Sanctuary Foundation Comments - Co-Chairpersons Leon Panetta & Hilary Bryant's Comments on Offshore Renewable Energy
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*Comment Received From: Monterey Bay National Marine Sanctuary Foundation  
Submitted On: 9/30/2020  
Docket Number: 17-MISC-01*

**Co-Chairpersons Leon Panetta & Hilary Bryant's Comments on Offshore Renewable Energy**

*Additional submitted attachment is included below.*



# Monterey Bay National Marine Sanctuary Foundation

**Secretary  
Leon Panetta**  
Co-Chair

**Hilary Bryant**  
Co-Chair

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Director

**Paul Michel**  
Director, Ex Officio

**Kris Sarri**  
Director, Ex Officio

Ms. Karen Douglas, Commissioner  
California Energy Commission  
1516 9th Street  
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 Chapter of the National Marine Sanctuary Foundation (NMSF), we 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 Monterey Bay Chapter works to raise public awareness of, advocate, and raise funds for Monterey Bay National Marine Sanctuary. Specifically, the Chapter has worked to raise funds to prevent wildlife disturbances through public outreach programs, known as Bay Net and Team OCEAN, as well as by supporting whale disentanglement efforts. It is our commitment to ensuring safe passage through the sanctuary to these migratory whales that has inspired our response to the above-referenced proposal.

The 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 Monterey Bay National Marine Sanctuary.

While we support the effort to achieve clean energy goals for the state, we share the concerns brought forth in the comment letter from Monterey Bay National Marine Sanctuary Advisory Council, dated August 21, 2020, and attached to this letter, specifically that Monterey Bay National Marine Sanctuary is not a place for a large industrial development like a wind farm. The precedent it would set would be counter-productive to national marine sanctuaries.

Additionally, our Chapter is working with the NMSF to not only support the effort to disentangle whales caught up in marine debris and abandoned gear, but also to mitigate future entanglements. The placement of cables, anchors, and other apparatus necessary for offshore wind development within the sanctuary would be perilous obstacles to these whales we strive to protect.

We thank you for the opportunity to comment on this proposal.

Sincerely,

  
Secretary Leon Panetta  
Co-Chair Monterey Bay NMSF

  
Hilary Bryant  
Co-Chair Monterey Bay NMSF

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**Sanctuary Advisory Council**  
**Monterey Bay National Marine Sanctuary**  
99 Pacific Street, Building 455E  
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