

DOCKETED

Docket Number:	23-MISC-01
Project Title:	Offshore Wind Waterfront Facilities Improvement Program
TN #:	253459
Document Title:	County of San Luis Obispo and REACH Comments
Description:	N/A
Filer:	System
Organization:	County of San Luis Obispo and REACH
Submitter Role:	Public Agency
Submission Date:	12/1/2023 1:39:44 PM
Docketed Date:	12/1/2023

*Comment Received From: Joshua Boswell
Submitted On: 12/1/2023
Docket Number: 23-MISC-01*

County of San Luis Obispo and REACH Comments

Additional submitted attachment is included below.



December 1, 2023

Eli Harland and Elizabeth Barminski
California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Comments on the Offshore Wind Waterfront Facilities Improvement Program (Docket Number 23-MISC-01)

Dear Mr. Harland and Ms. Barminski:

Thank you for the opportunity to provide comments on the development of the Offshore Wind Waterfront Facilities Improvement Program. With the Morro Bay Wind Energy Area off the San Luis Obispo County coast, the County and REACH have a deep interest in offshore wind development. The County and REACH have collaborated on several energy related endeavors including offshore wind in the past and together provide comments on the development of the CEC's grant program.

There has been extensive community planning to prepare for offshore wind on the Central Coast:

- In 2021, the County of San Luis Obispo adopted a [resolution](#) and regional leaders issued a [joint letter](#) to Governor Newsom and President Biden committing to proactive planning on offshore wind and seeking state and federal funding to advance port infrastructure feasibility studies.
- In 2022, REACH, in partnership with the County of San Luis Obispo, County of Santa Barbara and City of Morro Bay, conducted and released a [Central Coast Emerging Industries Waterfront Siting and Infrastructure Study](#) outlining options to enhance regional port infrastructure, complementing state and West Coast wide studies conducted by the State Lands Commission, Bureau of Ocean Energy Management, and National Renewable Energy Laboratory.
- In late 2022, Central Coast government, education and civic leaders issued an [open letter](#) to the winners of the Morro Bay Wind Energy Area expressing a commitment to collaborate on issues including waterfront infrastructure.

We have appreciated working with the CEC and other agencies and stakeholders to prepare for Central Coast offshore wind and look forward to elevating this collaboration going forward. **We believe the Offshore Wind Waterfront Facilities Improvement Program provides an important opportunity to deepen regional-state integration and collaboration towards developing the Central Coast as an operations and maintenance (O&M) hub.** We respectfully provide several recommendations as the CEC looks to develop the program:

Provide flexibility to ensure program funds can align with and support regional efforts

Following the completion of the Central Coast Emerging Industries Waterfront Siting and Infrastructure Study, the region is actively working towards launching its next phase of planning. The County of San Luis Obispo was allocated \$1 million by the legislature for further port infrastructure efforts, providing an initial opportunity to support regional ports and harbors to advance planning.

Funding from the Offshore Wind Waterfront Facilities Improvement Program will be critical to supplement and build on this next phase of regional planning work. We recommend the CEC set criteria that will enable flexibility for applicants to integrate state funding into existing efforts, such as by:

- Allowing applicants to define a scope of work for funding that may cross over different categories of activities so that the scope is integrated with and appropriate for their existing planning efforts. Without internal funding to move work forward, local ports and harbors will likely have to rely upon a blend of local, state, federal and/or private funding. Flexibility in defining a scope appropriate to their needs and existing planning will be helpful in ensuring state funds are most impactful and amplified by other sources of funding.
- Allowing applicants to consist of an individual waterfront facility, an entity partnered with waterfront facility(ies), or some coalition of waterfront facilities and other partners in the same region so that applicants can determine the most appropriate approach for their context. Along these same lines, applications could be flexible so as to consist of one or more projects with minimum/maximum funding levels adjusted based on the number of projects.

Prioritize applicants with small/mid-sized waterfront infrastructure facilities

The major impediment to date in advancing offshore wind infrastructure planning on the Central Coast has been the lack of funding. Local ports and harbors have small budgets and face significant financial constraints for existing operations, leaving no capacity to resource and advance offshore wind activities.

Sustained, multi-year state support to advance planning is vital to ensuring progress and that there is equitable opportunity for smaller and mid-sized waterfront infrastructure facilities on the Central Coast to participate in the emerging offshore wind sector.

Prioritize support for operations and maintenance (O&M) efforts

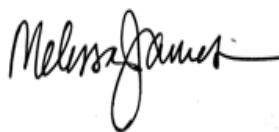
A key finding of the Central Coast Emerging Industries Waterfront Siting and Infrastructure Study was that *“Small Facilities [i.e., for operations and maintenance and installation support] within the study area will be required to support wind farm operations within the current Lease Areas.”* Given the critical role that ports and harbors in San Luis Obispo County are likely to play in essential O&M activities and potentially earlier in site surveys and installation support, resourcing in the short term will be key to meeting anticipated timelines for offshore wind deployment.

Thank you for your leadership and consideration of these comments. We look forward to working with the CEC to advance these important efforts.

Sincerely,



Rebecca Campbell
County Administrative Officer (Acting)



Melissa James
President/CEO
REACH