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Docket Number:	23-MISC-01
Project Title:	Offshore Wind Waterfront Facilities Improvement Program
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Document Title:	West Coast Pelagic Conservation Group Comments - re California's Offshore Wind Waterfront Facilities Improvement Program
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Organization:	West Coast Pelagic Conservation Group
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Comment Received From: West Coast Pelagic Conservation Group
Submitted On: 12/1/2023
Docket Number: 23-MISC-01

re California's Offshore Wind Waterfront Facilities Improvement Program

Additional submitted attachment is included below.

Re. Docket #23-MISC-1:
Project Title: OffshoreWind Waterfront Facilities Improvement Program:

From: CEC Workshop:
Developing Solicitations for AB 209 Offshore Wind Port and Harbor Infrastructure Improvements:

PRC Section 25666. (a)

***The Commission shall establish and administer a program to support offshore wind infrastructure improvements in order to advance the capabilities of California ports, harbors, and other waterfront facilities to support the buildout of offshore wind facilities and maximize the economic and environmental benefits of an offshore wind industry in California*.**

To the California Energy Commission et al.

West Coast Pelagic Conservation Group Comments:

Thank you for the opportunity to comment: The West Coast Pelagic Conservation Group (WCP) submits the following comments regarding California's *OffshoreWind Waterfront Facilities Improvement Program.*

WCP's membership is composed of commercial fishermen and processors. Our organization's present focus is on collaborative research with the Southwest Fisheries Science Center (SWFSC) Coastal Pelagic Survey. However, our members harvest, process, and market all major species of seafood from the waters off California, Oregon Washington, and Alaska. Our processors serve over one thousand fishermen, and our fishermen and processors employ over 5000 people. Our members have the five largest fish processing plants from San Francisco to the Canadian Border and sell and distribute fresh and frozen seafood from every major West Coast and Alaska fishery across the U.S. and globally.

WCP has stated in numerous public comments to the Bureau of Ocean Energy Management (BOEM), National Marine Fisheries Service (NMFS), the California Energy Commission (CEC) and other California agencies that we are gravely apprehensive about how BOEM, the Administration, and the State of California have embarked upon a regulatory sprint to industrialize our oceans with the nascent technology that is Floating Offshore Wind Energy (FOSW). This "plan" for constructing FOSW is going forward regardless of monetary cost overruns, enormous ecological and biological data gaps, and the fact that OSW will eliminate the majority of our U.S. Fishing Industry. Nor is the loss of hundreds of billions of dollars to our U.S. fisheries, coastal communities, and Nation accurately calculated, or are there plans or efforts to do so. Furthermore, we are impairing our

national food security, by discarding the sustainable U.S. supply of one of the healthiest sources of protein on the planet, in exchange for imported seafood that is harvested or raised with little regard for the environment and the use of forced labor. Lastly BOEM has largely ignored guaranteed Tribal rights that secure Tribal heritage, culture, fishing rights, and access to Usual and Accustomed areas, and the resources that inhabit or pass through these areas.

The return on investments in port improvements, FOSW development, and the electricity transmission are wholly dependent on BOEM's success in removing fishermen from their accustomed fishing areas, tribal acquiescence, an allowance to kill endangered species, disturbance of many migratory patterns, and that bypass rigorous and critical environmental and ecological review.

OSW development is on a fast track that is concurrent with epidemic increases in worldwide hunger, malnutrition, and starvation. All, to score credits that OSW benefits will reduce carbon emissions enough to halt climate change. OSW is not the solution. Even the east coast Vineyard Wind Environmental Impact Statement (EIS) states that U.S. OSW will not make a discernable difference[1].

West Coast Port Services for FOSW: Capacity and Need:

WCP's comments are focused on several questions and concerns about California jumping rapidly forward to enhance their coastal ports' infrastructure to manufacture, assemble, and handle machines that are taller than the Eifel Tower, weigh hundreds of tons, and require deep harbors.

First, we cannot understand why California needs to improve additional ports, when you already have on the docket the "***Pier Wind"*** project at the Port of Long Beach, California, and the **"*Blue Wind*"** project in Puget Sound, Washington. Blue Wind proponents alone, have stated they will have sufficient port infrastructure and capacity to manufacture, assemble, and load the necessary tow-vessels to cover FOSW structure demand for the west coast and Alaska.

Pier Wind[2]-Long Beach, CA: Staff Workshop on AB 209 Offshore Wind Waterfront Facilities Improvement Program: November 3, 2023

"PORT OF LONG BEACH RELEASES PIER WIND PROJECT CONCEPT "NATION'S LARGEST WIND TURBINE FACILITY KEY TO CALIFORNIA'S CLEAN ENERGY FUTURE"[3]

PRC Section 25666. (a): *The commission shall establish and administer a program to support offshore wind infrastructure improvements in order to advance the capabilities of California ports, harbors, and other waterfront facilities to support the buildout of offshore wind facilities and maximize the economic and environmental benefits of an offshore wind industry in California*.

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[1] the Final Environmental Impact Statement from the Vineyard 1 project includes the following Precautionary observation:" Vineyard 1 EIS*:" Overall, it is anticipated that there would be no collective impact on global warming as a result of off shore wind projects, including the Proposed Action alone"*

[2] Port of Long Beach Releases Pier Wind Project Concept - Port of Long Beach (polb.com)

[3] Staff Workshop on AB 209 Offshore Wind Waterfront Facilities Improvement Program;

"The facility would span up to 400 acres of newly built land located southwest of the Long Beach International Gateway Bridge within the Harbor District. The Port's concept study, available here, provides information to continue planning and discussion with state and federal officials, developers and funders for the $4.7 billion project. Pier Wind would also create new jobs and career opportunities for the communities closest to the Port that have been disproportionately impacted by climate change and port operations. Community members would participate and benefit as California transitions away from fossil fuels and into a green economy. Construction could potentially start in January 2027, with the first 100 acres operational in early 2031, the second 100 acres operational in late 2031, and the last 200 acres coming online in 2035."[4]

Blue Wind,[5] Puget Sound, WA: "*Washington Gov. Jay Inslee and the nonprofit Washington Maritime Blue announced the launch of a new offshore wind supply chain campaign on Tuesday. The project, named Blue Wind, aims to establish the Evergreen State as a leading manufacturer and exporter of offshore wind turbines."*

"But Washingtonians fit the bill. The state hosts the highest density of engineering and science workers in the western United States. The state is among the most-educated in the nation. The state's existing technology sector is valued over $138 billion and employs more than 350,000 people. Washington is full of educated, experienced, capable problem-solvers and material-makers[6]".

WCP: Conclusions and comment: California states they want to be the largest "complete process" FOSW "facility. Washington has 3 ports that we know could qualify and two more that might with the ability to maintain relatively low costs. They claim they can outfit the west coast and Alaska with turbines.

As most of the WCP membership run businesses we know that duplicating effort or moving from one venue to another to manufacture production items to completion adds costs that can put competitive businesses out of business. (I.e., manufacturing in one locale and shipping to another for assembly) Concentration of all steps and being close to the shipping point speeds up manufacture, meaning you achieve more at less cost and a faster pace. With the capacity development plans for both Puget Sound and Long Beach it does not appear to be efficient or cost effective to have additional smaller FOSW facilities, except possibly for maintenance or crew supplies for construction workers and vessel crew.

Staff Workshop on AB 209 Offshore Wind Waterfront Facilities Improvement Program:
OSW Port Studies US West Coast pg 26
Adding a new maritime industry without displacing or replacing existing maritime uses
There are no existing port terminals on the US West Coast that can currently support OSW: (Pg 26)

1. *Requires significant investment and development.*
2. *Requires a multi-port strategy.*

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[4] Reference Foot note 2
[5] Washington State is Spinning Up Its Wind Turbine Supply Chain - Alliance for American Manufacturing
[6]

Blue Wind is coming: State spins up offshore wind supply .

3. ***Adding a new maritime industry without displacing or replacing existing maritime uses.***

WCP concurs with requirement 1 of the OSW Port Studies. Conditionally we agree with bullet 2. To be clear we believe that the "multi-port" strategy is sufficient when there is enough capacity plus 10% to meet production requirements. From the reports we read Puget Sound and Long Beach could easily cover the entire coast, negating the need to spend billions on smaller ports and provoke negative environmental consequences. We believe Washington alone might be capable of achieving that goal, however there may be conflicts with multiple FOSW developers wanting equipment at the same time. For that reason, we would recommend not curtailing the Long Beach project. However, if each FOSW center is capable of producing large numbers of turbines annually it may make sense to scale back one or both projects. When weather shuts down offshore construction and the transfer vessels can't work, there should be an ability to "stockpile" equipment. Unscheduled production shutdowns are costly and result in work force losses so regional capacity potential should be thoroughly evaluated. Stockpiling turbines should be a factor in this analysis.

We cite bullet 3 on "displacement". This statement is ironic. We have not seen any evidence that agencies involved with Offshore Wind Energy will offer more than minimal protections to our fishing industry. The same can be said for equitable compensation of losses. There is no question that offshore wind as planned by BOEM and California will eliminate a good percentage of the fishing industry. The obvious reason is displacement, but it is also likely the effects of FOSW on ecological function will minimize biomass or create a different suite of species, that do not meet market needs, or match-up with present permits and regulations. With the significant data gaps that exist on the effects of FOSW on the California Current Ecosystem and food web no one can predict what the marine biosphere composition will be or if the ocean productivity will drop.

The only way to protect the fishing industry, and for the industry participants to receive equitable treatment, is to have equal and authorized representation from our industry that guarantees the protection of their traditional fishing grounds. To realize this, our industry must possess the authority to veto a wind project when it conflicts with fishing on grounds necessary to stay in business. Fishing industry participants must also be able to determine their compensation for losses of income and assets when they do occur. These must cover income losses over an equitable duration of time, depreciation of assets, and stranded capital. This must be administered by a Federal Agency (NOAA Fisheries) that does not need basic training in fishery practices. The developer and BOEM should have no part in this process unless it is to contribute income for the fishing industry compensation as is equitable, appropriate, and determined by the determining agency. As of now bullet point 3 will not be fulfilled.

Other considerations: Environmental, Ecological ,and Bilogical concerns for the Fauna, and Flora, and Essential Fish Habitat (EFH) in our Marine Estuaries: Another reason to restrict the number of ports to manufacture or assemble FOSW machinery to several large city ports is the important role marine estuaries play in the early stage life cycle and migration of many species of fish, mammals, and birds. Many of the coastal ports would need to be dredged and/or altered in ways that could affect estuary salinity and currents. This could affect the juvenile salmonoids' ability to acclimatize to salt water and eliminate essential forage and important fish and seabird habitat. Stockpiling turbines may shade sunlight from aquatic plants such as eel grass that require sunlight. Eel grass density and habitat is highly ranked as one of the most important plants in estuarine environments by many NGO's. These plants also provide refuge against the predation of juvenile fish by larger predators. As example we include excerpts from articles specific to the Humboldt estuary. Our research shows there are many

federal, state, and local agencies and organizations cooperating to maintain Humboldt Bay's pristine environment.

Humboldt Bay National Wildlife Refuge: *The National Wildlife Refuge System is the world's largest collection of lands specifically managed for fish and wildlife conservation. Unlike other Federal lands that are managed under a multiple-use mandate, the Refuge System is managed primarily for the benefit of fish, wildlife, and plant resources and their habitat*.

Refuges use a wide range of land management tools based on the best science available. The management tools used are aimed at ensuring a balanced conservation approach where both wildlife and people will benefit. At Humboldt Bay NWR, management activities focus on research and monitoring of refuge wildlife and on protection and maintenance of a natural, functioning ecosystem. The U.S. Fish & Wildlife Service coordinates with tribes, other agencies and entities, and the public to ensure the long-term health and viability of native plant and animal populations.[7]

Western Hemisphere Shorebird Reserve Network: (WHSRN) : *Over 325 .species of birds have been found within the Humboldt Bay Complex including over 31 species of waterfowl numbering approximately 70,000 throughout the winter. Approximately 50 species of shorebirds have been recorded locally, with 30-43 species in any month of the year. The highest shorebird diversity occurs during autumn migration (August – October). This site is the northernmost wintering area for significant numbers of American Avocets, Long-billed Curlews, Marbled Godwits, and Willets. Surveys in 2018 estimated that around 500,000 shorebirds migrate through the Humboldt Bay area during April and early May*.[8]

California Department of Fish and Wildlife (CDFW) *Until recently, very little was known about juvenile salmon (especially coho salmon) and steelhead trout use of the SEE (Stream Estuary Ecotone) and the necessary habitat conditions*. *Estuaries are important as a transition zone for fish to physiologically adapt to differences in salinity as they migrate between streams and ocean environments. CDFW has found that juvenile coho salmon and steelhead trout typically rear in the SEE for months (sometimes up to one year), and that they grow faster than their cohorts rearing in stream habitat*.[9]

7

US Fish and Wildlife Service: Humboldt Bay National Wildlife Refuge

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Humboldt Bay Complex - WHSRN

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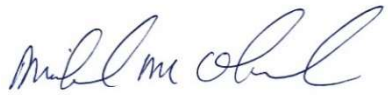
Salmon Creek, Humboldt County

A portion of what we have laid out in these comments may already have answers to our questions and concerns but we have not seen any evidence that the subjects we brought forward are part of the California “game plan”.

In conclusion:

- Is there a valid reason why we need more ports than the “Blue Wind” and “Pier Wind” projects? It appears these two “Wind” projects are scaled for more capacity than is required. Has this been reviewed? From our distant vantage point, we question whether there is a coordinated regional planning effort to ascertain what the total production capacity requirements are. Factoring in that when the stormy season arrives these FOSW platforms will be dangerous to install or to work on, logically it would be a time to manufacture and inventory a “turbine” reserve. Has anyone evaluated this?
- Again, we may not have adequate comprehension of the FOSW production needs but when the production requirements are mega-scaled why would we use small ports where you need to import labor, dredge harbors and channels, and that would most likely alter the estuarine ecosystems and biological diversity. This would not be a minor consequence in a wildlife refuge area like Humboldt Bay.

Thank you,
Sincerely,



Secretary WCP
Mokoniewski.consultant@pacificseafood.com
360-619-2019

COO Ocean Gold
Secretary WCP
Mokoniewski.consultant@pacificseafood.com
360-619-2019

C.c. Greg Shaughnessy
Vice President WCP
COO Ocean Gold Seafoods
gshaughnessy@oceancos.com;
cell: 360-310-0662