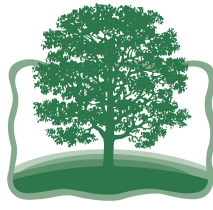


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Comment of North County Watch on the CEC strategic plan for offshore wind energy development

Additional submitted attachment is included below.



North County Watch

Looking Out Today For Tomorrow

docket number 17-MISC-01, “AB 525 Strategic Plan”
Submitted Electronically: docket@energy.ca.gov.

February 27, 2024

RE: Comment of North County Watch on the CEC strategic plan for offshore wind energy development

We appreciate the report’s statement that “A challenge to offshore wind development will be ensuring that wind projects, and related infrastructure, are developed in a responsible and timely manner while protecting coastal, marine, and tribal resources,” and that “More work is necessary to identify the geographically specific impacts and develop strategies to address them as specific plans for project development in the current lease areas become available.” The strategic plan enumerates potential impacts on coastal resources, fisheries, Native American people, national defense, and strategies for addressing potential impacts.

This project presents a significant number of unknowns in terms of potential environmental impacts, for many of which the methodology of prior comparison will not be useful. As the State Lands Commission has observed, “It’s important to note that the bathymetry of coastal waters in Europe and the U.S. East Coast significantly differ from that of the U.S. West Coast: on the East Coast, the continental shelf drops off gradually, meaning that depths are, relatively speaking, shallow, even far offshore. On the U.S. West Coast, the continental shelf drops off steeply, meaning that even close to shore, the waters are deep.”

The high level of unknowns presented by this project will therefore require a commensurate level of environmental review and mitigation, including the designation of sensitive areas and reduction of vessel speeds both to mitigate the greenhouse gas emissions during installation and operations and to reduce impacts to marine wildlife.

As illustrated in Figure 11-1 Conceptual Timeline to Achieve Offshore Wind Planning Goals, there will likely be no less than eleven CEQA/NEPA reviews across the categories of leases, subsea cables, ports & waterfront facilities, and transmission. All involved agencies should resist the temptation to limit each review to its own category rather than analyze the cumulative impacts in all categories, as the impacts of each category cannot be separated from the others.

To that end, we agree with comments stressing the importance of participation by the state in BOEM’s Programmatic Environmental Impact Statement, as the PEIS will set the table and determine the outcomes for everything that comes after it. As the strategic plan notes, it “could also allow for consideration of cumulative impacts on a broad scale and broad policy alternatives and program-wide mitigation measures.”

As the graphic representation of the timeline for all current and future offshore wind development, Figure 11-1 raises several questions:

- Where is CEQA/NEPA review for the proposed Central Coast, Crescent City and San Diego ports? In each column of the timeline, this area is blank, followed by "Construction."
- The identification of cable routes for the existing leases will occur simultaneously with the PEIS for the existing leases. If the operators do not confirm the cable routes until shortly before the PEIS is scheduled to be released, it would not seem likely that adequate environmental analysis and mitigation of those impacts could be included in the PEIS.
- Why do the last five years of CEQA/NEPA for future leases overlap the first five years of construction in future lease areas? Do the agencies intend to conduct environmental reviews in future lease areas in sequence, permitting construction in each lease area after each review is complete but while the remaining reviews are ongoing? If so, this again raises concerns about insufficient consideration of cumulative impacts and the potential piecemealing of each separate review as part of the larger project.

BOEM should require the offshore wind companies to demonstrate how noise from construction and eventual turbine operation will be avoided, minimized, and mitigated to the fullest extent feasible.

North County Watch is a 501c3 public benefit corporation incorporated in 2001. We advocate for environmental protections in San Luis Obispo County and regionally. Thank you for the opportunity to comment.

Regards,



Susan Harvey, President
North County Watch

susan@ifsusan.com
805-239-0542