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## **Offshore Wind will negatively impact California's environment, economy, and fishing heritage**

Public Comment regarding the California Energy Commissions Strategic Plan (SP) for Offshore Wind

California is \$74 Billion in debt as of 3/2024. What money we have, we need to spend it wisely, not on a multibillion-dollar project that will be a pile of junk in 20 years. There are less costly, less destructive, more energy efficient, less carbon footprint, and less space requiring energy sources than offshore wind. We only need to see how it has gone in Europe to see what a disaster wind energy will become for California, especially offshore wind energy. Due to the high cost of installation, the high cost of maintenance, and the high unreliability of wind, the UK now has the highest electricity costs in the world.

Siting wind energy areas off California is a bad idea for multiple reasons. #1 reason is that California has an infamous beautiful natural coastline that people come from all over the world to see. Why would we want to ruin that view shed with unnatural machines tainting one of the best assets California has?

California does not have the geography suitable for offshore wind. We don't have the needed port infrastructure close to the wind. The CEC SP states there will need to be at least \$11 Billion dollars invested into port infrastructure to accommodate these monsters. And still they would have to be towed over 200 miles to the wind energy areas. This means they would have to be maintained from 200 miles away unless of course you plan on industrializing our tourist towns of Morro Bay and Avila with giant cement platforms, mile long artificial jetties, cranes, oil storage, and wet storage for the platforms in the bays. That is not what tourist want to see! They come to the central coast to see the ocean, the whales, the otters, and enjoy the coastline's natural beauty.

California's ocean bottom drops off quick and is deep; 3600 feet where the wind energy area (WEA) is located. This makes for a technical nightmare. There is a reason there are only 15 floating wind turbines as of 3/2024 in the world and 5 are out for repairs. The scope on the mooring lines will need to be 7-9 times the depth so nearly 3 miles long and weigh over 400 tons! The steel chain will electrolysis and have to be changed out regularly leaving large amounts of rusted chain stored at the docks, in our landfills or on the bottom of the ocean! The mooring lines will scour the bottom with all that extra length. This will destroy anything in its path. The Morro Bay Wind energy area is 60% in Essential Fish Habitat. Equinor's site is 100% in EFH!

Map done by USGS EXPRESS showing the WEA location inside EFH/HAPC and

containing Quantitative biology sites.

The location off Central Coast California is deep requiring floating technology, is not close to needed port infrastructure, is close to military operations, and does not have a reliable wind source. This leads to a lot of extra costs, unreliability, and inefficiencies.

1. With using floating technology, the platforms will pitch, meaning that if they pitch or tilt (greater than 7 degrees per wind developer) too far in a moderate swell (greater than 10 ft), they must be turned off.
2. If the wind blows too fast, they will have to be turned off.
3. The wind tends to be calmer at night when wind is supposedly going to offset solar.
4. It is in the air path for Department of Defense training so the MBWEA will be required to be turned off 600 hours/year.
5. The wind, particularly on the Central Coast, doesn't blow sometimes for weeks at a time.

Because of the abundance of sea and air life along California's coastline, there will be tremendous impacts on marine birds, ocean life, and the people who rely on the ocean for their livelihoods and recreation.

1. It is directly in the path of the Pacific Flyway where thousands of migratory birds come thru every year. There are also thousands of local "soaring" birds that will get killed by the tips of the blades including pelicans, shearwaters, terns, albatross, and gulls (per BOEMs EA report)
2. It is directly in the path of several migratory mammals, turtles, and fish. Particularly the whales and other cetaceans will be significantly impacted from the noise pollution. Including many endangered or threatened species.
3. The cable corridors are in prime fishing grounds for salmon, Dungeness crab, halibut, deeper and nearshore rockfish, and spot prawns.
4. The WEAs are in prime fishing grounds for black cod and other deep-water groundfish as well as in historical albacore and swordfish fishing grounds.
5. The HVDC export cables will come to shore in highly used surfing and swimming areas.
6. The HVDC export cables will go thru ESHA, EFH, MPAs, and Sanctuaries.

Figure 4-1: Impacts of Floating Offshore Wind Components and Potential Mitigation Strategies is full of mistruths and false pretenses. There will be no way to meaningfully avoid conflicts with wildlife or impacted stakeholders with the proposed projects.

1. Bird mitigation "it is false to assume that there are less birds impacted out 20 miles. There are still several thousands of migratory birds that will fly over the WEA. Ask the fishermen, they will tell you that sometimes the sky turns black with the density of

birds out in the ocean. Especially at night or in the fog when their vision is impaired, they will get struck. Also, bait fish, the food of many marine birds, are attracted to structure. Birds will dive after “bait balls” and not avoid the blades.

2. Benthic disturbance mitigation “ Suction anchors will need to be deep, requiring loud high-resolution mapping that is proven to kill larvae and fish. The mooring lines will still need some scope for adjustment to wave height resulting in scouring of the bottom. The WEA are in Essential Fish Habitat and Habitats of Particular Concern, there is no way to avoid protected ancient sea corals that are important to the survival of deep-water groundfish, an important fishery. This figure doesn’t address the impacts of jet plowing the bottom with 12,000 gallons of water/minutes to bury the cables. Causing a sediment plume that will bury breeding and spawning grounds and resuspend heavy metals, lead, and “forever” chemicals.

3. Electromagnetic Field mitigation “ There will be hundreds of miles of inter array midwater cables that are not buried. How are they going to monitor all these lines? There is a high degree of vulnerability to gear and animal entanglement, whales scratching on the cables, and other issues with “cable failure”. These are HVAC cables that also will heat the water 36 degrees 2 feet away from them. The export cables are HVDC and carry up to 1200 MWs! They will emit electromagnetic fields even if they are buried. It has been found that lobster and crab eggs exposed to these cables will become deformed! They will impact certain species migration, breeding, and feeding patterns that are sensitive to EMF such as salmon, tuna, sharks, and skates. In Europe they have had frequent cable failures due to multiple factors, over 90 in the last 7 years! Many of the cable routes will go thru Environmentally Sensitive Habitat Areas around Morro Bay and Diablo and Marine Protected Areas and National Marine Sanctuaries, especially if they use the proposed subsea cables routes between Moss Landing and Humboldt and Moss Landing to Port Hueneme as proposed by Equinor. We have no idea how subsea cables are going to cross deep canyons.

4. Radar Artifact mitigation “ The wind turbines will cause multiple artifacts on our radars in and around the WEA. It will render captains literally blind in the fog or at night. It is a HIGH RISK for collision. This is why it will be difficult to impossible for military training and coast guard search and rescue inside and around a WEA. There is no meaningful mitigation for this impact, and it is a national security risk as well.

5. High Resolution Geographic Survey mitigation “ is not even mentioned. There are no mitigation plans for independent acoustic monitoring to ensure the CEQA standards of the permit are followed. There are no mitigation plans for biological surveys such as a BACI design to study the impacts to mammals, fish, and invertebrates. The East Coast allowed these surveys to occur unmonitored and ended up with the highest stranding of dead whales in history during the time and location of their site surveys! There is also no mitigation plan for the loss of fishing opportunity during these surveys for the impacted commercial fishermen.

This Figure 2-1: Floating Offshore Wind Configuration is also deceiving and misleading.

1. It doesn't allow people to understand the true amount of cabling that will be required. Each turbine is 1 mile apart and there will be at least 200 turbines in the MB WEA. That means 200 miles of just the "inter-array" cable to the one shown here that are all mid water/not buried hot AC current in the water.
2. The substation looks like a small floating buoy, when it will be a giant industrial platform easily seen from shore that uses open once thru cooling that will kill larvae and juvenile fish and heat the water.
3. The export cable looks short. There are plans for hundreds of miles of subsea export cables using multiple substations that will ruin the viewshed of our pristine coastline and destroy the habitat of multiple ocean species and significantly impact multiple important fisheries.

The sentence "The larger 1 GW project could create more than 13,000 full time jobs, about \$1.09 billion in earnings, \$3.23 billion in output, and \$1.57 billion in gross domestic product" is full of assumptions and grossly exaggerates the jobs and money produced from offshore wind farms. We were told by an offshore wind developer that a 100-turbine wind farm will require 50 full time jobs. The short-term jobs assume port infrastructure jobs in Morro Bay and Avila that have not been approved and may never be approved. The citizens don't want it! We have Measure D that will not allow development in the proposed area except for commercial fishing. Also, the CADEMO project has not been approved either and hopefully it won't be since its location is in very important ocean wildlife habitat.

We don't have the flat coastline space to build giant blades, chains, cables, and towers and transport them safely to the ports. Admit it, most of the parts will come from Europe, China, or somewhere outside of California. Also, you forgot in your calculations, the increased cost of electricity to nearly 5 times more than we currently pay. What impact will that have on the underserved, poor, tribes, and everyone in California? How will that impact inflation and the cost to do business?

The CEC SP admits to the need for large investments in port infrastructure, in transmission upgrades and new transmission infrastructure, and battery storage to accommodate offshore wind development. Where is the economic analysis to make sure it is even economically feasible to do offshore wind before we start building? Especially with our current debt. Sounds like we have the cart before the horse. Why should we allow the Offshore Wind developers to begin destructive Site Assessment surveys with high resolution geographic sonar imaging to harass and kill wildlife when we have no idea if we can even afford the infrastructure needed to make these projects happen? Is the Governor just counting on digging deeper into the taxpayers' pockets? What if they deny the Bond measure?

Also, it sounds like our State agencies are "coordinating" to "use their designation authority" to expedite offshore wind development which means removing "constraints and conflicts" with environmentally sensitive habitats, existing land uses, tribal cultural resources, and others. Sounds like communist China! Why are we circumventing California laws and processes to protect our environment, culture, and

economy for this destructive energy industry owned by foreign companies, foreign pension plans, and oil companies? Not by local Californians.

The proposed ~4,500 square miles of ocean "Sea Space" designated for offshore wind farms is unconstitutional. The California Constitution only uses the word "absolute" in reference to one fundamental right " it's not the freedom of speech, press, privacy, or religion which some might expect. It is the freedom enjoyed and protected by all who fish in the public trust waters of the State of California " reserving in the people the absolute right to fish thereupon" Absolute" means "something that is free from any restriction or condition."

Most of the commercial fishermen go north to follow the albacore, fish Dungeness crab and for chinook salmon. The over 3000 square miles planned in northern California will literally wipe out the commercial fishing industry.

Where is the cost/benefit analysis?

Especially when BOEM concludes that offshore wind projects "would have no collective impact on global warming. "

Please reconsider industrializing California's coast.

Sincerely,

Tom Hafer  
President Morro Bay Commercial Fishermen's Organization