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Comments on strategic plan for Central Coast offshore wind

Hi there;

By now the commission has received numerous letters regarding the draft strategic plan and the vast majority have been letters pointing out the numerous oversights, negative impacts and basic inconsistencies of developing offshore wind projects on the Central Coast and the nearshore, shoreside and onshore problems that will be encountered throughout the life of the project. REACT Alliance would like to be counted as an Alliance of individuals and groups that are adamantly opposed to each and every aspect of this project!

We go on record as supporting the letter and observations of the YTT Chumash, the Morro Bay Commercial Fishermen's Organization and the very comprehensive list of issues as delineated by the PNF Coastal Preservation group. Furthermore, instead of writing a "me too" letter reiterating the multiple reasons for opposition, we would like to take a different tack and Instead, we would like to address some glaring inconsistencies as relates to the impacts to the Morro Bay Harbor/National Estuary and the significant impacts that would be the result of plans for the future use of our community as a wind industry base (developing an industrial port) and landing site for cables running from the WEA substations to shore.

Many in REACT Alliance are long time residents of Morro Bay and the surrounding area and are quite familiar with the history, geology, harbor facilities, wildlife and the laws governing several state and federally protected habitats, areas and species. The fact that the CEC is so oblivious to the fact that Morro Bay is literally a one of a kind eco-system, is one of the last remaining healthy estuaries in the US, is home to endangered wildlife species and a good majority of it's acreage is designated as ESHA and protected under EPA law is amazingly mind blowing. Morro Bay will never be a "port" but is, by definition, a small harbor within the confines of an estuary that is within a much larger and shallow bay, Estero Bay. The CEC document attests to the fact that very little is known about our harbor, its dimensions, its mooring and berthing capabilities, and the uniqueness of this one of a kind ecosystem and its inhabitants.

As an introduction to the facts that support REACT's position, we provide a short history of Morro Bay...the harbor and estuary. Morro Bay has in the past been targeted by the military as a potentially viable deep water port. Their efforts to make it one was one of the most ill-advised and fruitless efforts in our coastline's history. Morro Rock, until the mid 1930's was an island and entrance to our very small and shallow harbor was

dependent on the tide, the draft of the boat and ocean conditions. One could enter on the east side or go around the rock to enter through a naturally occurring channel. Post World War I, the Army Corps of Engineers filled in the eastern entrance with a solid causeway and constructed the now standing north and south jetties creating a new and relatively narrow harbor entrance in an effort to create a military deep water port. Long story short, it didn't work for many of the same reasons it wouldn't work now, but at that time the Embarcadero, and the North and South T piers and all of the associated facilities didn't exist.

Fast forward to April, 2024 and here's what exists...one of the most dangerous harbors to sail into because the narrow harbor mouth (created by the military) bars up yearly as a result of deposition of sand between the jetties. Vessels now enter a shallow and narrow harbor entrance with a 90' dogleg to enter the harbor itself. The City now has two T- piers that can accommodate large yachts up to 150', Coast Guard and Fish and Game vessels and large visiting fishing vessels with drafts no more than 15ft and a beam of usually no more than 20ft. The adjacent turning basin is insufficient for anything larger, and the dredging vessel Yaquina has one hell of a time maneuvering even with positioning thrusters.

Since the mid 1930's when the previously determined to be extinct southern sea otters were discovered in Big Sur, the species has slowly recovered. Now a small resident population of close to 50 adults and pups resides in Morro Bay including the harbor entrance and the harbor and back bay areas of Morro Bay. Sea otter habitat including a small kelp forest below Pilot Rock (an outcropping adjacent to Morro Rock) and a busy nursery at the base of the south T-pier is a source of interest and delight to visitors who come here specifically to view these highly endangered species. Morro Bay is a safe ecosystem for them as there are no predators within the confines of the harbor and there is abundant food for them in the bottom sediments and at the base of the eelgrass and on the bottoms of docks of the harbor. The estuary is the perfect home offering numerous places in the eelgrass that lines the navigation channel for rest, grooming and foraging.

Since the initial restructuring of the harbor in the 30's other crucial changes have occurred that would make the expansion of the current harbor facilities impossible and legally untenable. The entire navigation channel, including the edges of the causeway revetment is lined with eelgrass, and all along the majority of the east side of the sandspit and into the back bay is prime eelgrass habitat, determined to be essential to the biological survival of the estuary. Eelgrass habitat is considered to be ESHA (a federal determination that can only be changed by the EPA). Now, unlike in the 30's the entire waterfront has been built up along the Embarcadero and the fishing fleet, recreational fishing boats, ecotourism rental docks and berths for private vessels define the waterfront.

Restaurants and visitor serving businesses line the Embarcadero all the way north to the North T pier. There is NO accommodation for an industrial port without

uprooting dozens of businesses and eliminating commercial fishing berths and services which is currently against our city codes and against legally mandated accommodation for the fishing community.

The kinds of activities that it would take to displace the current businesses and waterfront lease holders, and to rebuild the area from the South T- pier north to Coleman Beach for OSW industrial port facilities would create such high levels of anthropogenic noise, pollution and turbidity that it would render the estuary, inclusive of both the back bay and the harbor, uninhabitable to most life forms. To even contemplate this kind of biological, economic and community disturbance is unimaginable!

In order to render our small community harbor usable as an OSW operations and maintenance port that could accommodate numerous SOVs (over 320 ft long) and employee transport vessels, the Embarcadero would have to be commandeered from Beach street north to Coleman Beach. The end of the sandspit would have to be removed, the harbor entrance rebuilt and widened, and the navigation channel dredged to twice its current depth. Operations offices would have to be built on land that is currently not available, exit roads would have to be built to accommodate a circular traffic pattern and safety issues, and parking would have to be arranged that could not just accommodate OSW but Morro Bay visitor serving uses. There literally is no way in hell this can and will happen! There are Federal, State and local laws that will prevent this kind of wholesale destruction from happening, especially since the harbor is within the boundaries of a national estuary and adjacent to MPAs within the estuary confines. Considering that the estuary is a semi closed system that is tidally dependent and reliant, any and all activities that happen within the confines will impact the whole...bottom disturbance, survey and construction noise, operations of large SOVs and thruster positioning in a narrow space, and day to day noise of an industrial port. Sound carries much farther and 4 times as fast in water and tidal flow will carry pollutants and disturbed bottom sediments throughout the estuary...legally and morally unacceptable outcomes.

So you can see, that consideration by the CEC of Morro Bay as an OSW serving industrial port is absolutely not acceptable: It is completely economically infeasible for our city, environmentally unsound, and would be a blow to our community in countless ways.

REACT has chosen to focus on this aspect of consideration of OSW on the Central Coast because it has not been fully or logically addressed by the CEC in their analysis. As we said in the beginning of this letter we are aware of countless aspects of OSW on the Central Coast that renders the project untenable and we support those groups that do not feel any mitigating process would suffice in making this project acceptable...in other words the only acceptable outcome or option is NO PROJECT!

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