

DOCKETED

Docket Number:	17-MISC-01
Project Title:	California Offshore Renewable Energy
TN #:	255855
Document Title:	The Friday Group Comments - Protect Endangered Southern Sea Otters
Description:	N/A
Filer:	System
Organization:	The Friday Group
Submitter Role:	Public
Submission Date:	4/22/2024 10:31:40 AM
Docketed Date:	4/22/2024

Comment Received From: The Friday Group
Submitted On: 4/22/2024
Docket Number: 17-MISC-01

Protect Endangered Southern Sea Otters

Additional submitted attachment is included below.

To the California Energy Commission:

April 24, 2024

We the undersigned members of The Friday Group appreciate this opportunity to comment on the Commission's Draft Assembly Bill 525 Offshore Wind Strategic Plan.

The Friday Group is a nonpartisan, grassroots, community-centered group based in San Luis Obispo County. We have been meeting regularly in Morro Bay since 2020 and focus discussion and action on local matters, as well as on statewide issues that impact us on a local basis.

We are writing to oppose the plans for an industrial O&M port in Morro Bay and found the draft report seriously deficient in failing to acknowledge the presence of a population of 50 or so endangered Southern Sea Otters in the Morro Bay harbor and National Estuary within which the proposed port would be developed. According to [Sea Otter Savvy](#), a local non-profit dedicated to the protection and preservation of the species, the sea otters *“have a number of physiological characteristics that make them particularly vulnerable to disturbance. In particular, sea otters have a very high demand for energy and spend a large portion of their time resting to conserve energy and foraging to get energy. Disturbance can disrupt these critical activities.”*

In the early 1900s, the southern sea otter was believed to have been hunted into extinction by the Pacific maritime fur trade until a small group was discovered in 1938 along the Big Sur Coastline. The Morro Bay population is decedent from that group and is protected by numerous State and Federal laws that prevent the type of harassment they would necessarily endure if the proposed Morro Bay port were developed. We ask that you amend your report to specifically include the southern sea otter and to detail impacts to this endangered species, just as you have done for other species of marine mammals. The analysis should describe how pre-construction activities, port development and laying of cables would impact the otters, as well as how additional overwater infrastructure and dredging may displace and destroy important nearshore habitats. Furthermore, port development would likely require pile driving and other sources of underwater noise impacts. Impossibly large ships would enter essential otter habitat polluting the water and air, and increasing noise and light pollution. The draft report offered no consideration as to how these factors would impact the threatened southern sea otter and we request that studies be conducted prior to any nearshore surveys, and included in your final report.

Monitoring after the fact is insufficient. Proper baseline studies are needed in order to obtain

meaningful data on the true impacts of OSW development on this threatened species, and how to best protect them.

We appreciate that the CEC supports robust baseline studies (as well as long-term monitoring) of our estuary and harbor prior to ANY activity, including HRG surveying in the Marine Protected Area, to help determine the true extent of impacts on this fragile ecosystem. Please lay out when baselines studies will begin, and who will be conducting them. We believe research should be conducted by a local independent party without ties to the OSW industry or government entities who appear biased in favor of industrialization. As the draft report acknowledges, the impacts of OSW development on our specific marine environment are not fully understood and are uncertain; baseline studies are essential to understanding and protecting the estuary and all its inhabitants. Furthermore, as the draft report claimed that it is impossible to calculate impacts without project specifics, which are currently unknown, we feel we are being asked to comment on something that is undefined and ambiguous at best, with benefits exaggerated and harms minimized.

In general, and for many reasons, we are alarmed by proposals to build an industrial port in the Morro Bay estuary, inside critical habitat for a protected species. Your report appears to place more emphasis on financial benefit and economic development of ports than on protecting our treasured natural environment, which is invaluable and which cannot co-exist with the proposed industrial O&M port in Morro Bay.

Thank you for your attention to these matters. We look forward to receiving your response to our questions and concerns.

Friday Group Members

Karen Aguilar
Nancy Bast
Rita Benavides
Melodye Bullis
Tara Burke
Brenda Carlson
Margaret Carmen
Amanda Davis
Linda Donnelly
Nicole Dorfman
Wynde Dyer
Betsy Gaudette-Cross
Kristen Headland

Mary Hudson
Heidi Kimbrell
Nattalia K. Merzoyan
Cindy Muir
Ann Reisner
Judy Setting
June Swall
Mara Stevens
Elaine Watson
Rachel Wilson
Betty Winholtz