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comments on OSW seascape planning and impacts to fishermen

please see the attached letter. it is unsigned but if there are questions please contact Alan Alward, the signatory, at 7aalward@gmail.com

Additional submitted attachment is included below.

**Alliance of Communities for Sustainable Fisheries
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Rachel MacDonald
Program Specialist
Siting, Transmission, and Environmental Protection Division
California Energy Commission

Sent electronically

Re: Draft Consultant Report Sea Space Analysis for Wave and Tidal Energy (Docket 24-SB605)

Dear Ms. MacDonald,

Thank you for offering the opportunity to comment on the draft consultant's report.

Who we are

The Alliance of Communities for Sustainable Fisheries (ACSF) a 23-year-old 501(c)-3 not-for-profit organization, founded for the purposes of educating the public on fisheries issues, connecting fishing men and women ("fishermen") with their communities, and to represent fishing interests in state and federal processes. The ACSF is a regional organization, comprised of commercial fishing leaders representing Monterey, Moss Landing, Santa Cruz, Morro Bay, Pillar Point, Port San Luis, and Santa Barbara, on our Board of Directors. Port communities, several recreational fishing organizations, and the California Wetfish Producers Association, also have representatives on our Board. Thus, the ACSF represents a large cross-section of fishing and community interests for the Central Coast of California.

General Comments

The ACSF appreciates that the draft report does not put forward specific areas in California state water for wave and tidal energy projects. Rather, it identifies numerous environmental, fisheries, socioeconomic, and cultural constraints and uncertainties that should be taken into account as project siting may occur.

There are other fisheries than Dungeness crab, market squid, and Chinook salmon that may be affected by wave and tidal energy projects. Please work with the CDFW and NMFS to complete this list. Further, VMS is not required for the commercial Dungeness

crab fishery; please do not rely on VMS for complete data on this fishery. Direct conversations with fishery participants will be required.

It will also be a mistake to rely on fishing block information. Reporting fishing activity via blocks can be widely inaccurate, and the blocks are too large to provide the fine scale need for project siting.

The draft report fails to note that California state law includes protections to the following marine species:

- o Southern Sea Otter 2 (See Fish and Game Code §4700)
- o Great White Shark (Fish and Game Code §5517)
- o Unarmored threespine stickleback (Fish and Game Code §5515(b)(8))
- o Rough Sculpin (Fish and Game Code §5515(b)(9))

The ACSF recommends including reference to these species and the appropriate sections of the Fish and Game Code in the final report.

Any future wave or tidal project should AVOID Habitats of Particular Concern, as these areas have been designated as critical for the life cycles of commercially and recreationally important species.

It is important that the legislature and California Energy Commission understand the cumulative consequences of wave and tidal energy development. Considering the massive removal of fishing opportunity from Marine Protected Areas, Offshore Wind development, federal fisheries closed or restricted areas, and potentially offshore mariculture and aquaculture projects, In addition to area closures, the commercial salmon season is closed for the third year, due to habitat issues, and the Dungeness crab fishing has been limited due to whale interactions. It is important that any future wave or tidal projects be sited in areas that do not result in any further loss of fishing opportunity.

Thank you for considering comments from the Alliance of Communities for Sustainable Fisheries.

Alan Alward

Co-Chair

