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OSW econ benefits 17 MISC 01

Additional submitted attachment is included below.

California Energy Commission



Docket No. 17-MISC-01
Docket Office
1516 Ninth Street
Sacramento CA 95814
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**Re. Commission Report Preliminary Assessment
of Economic Benefits of Offshore Wind**

Dear Chair David Hochschild and
Honorable Commissioners,

Thank you for the opportunity to comment:
Re. Docket No. 17-MISC-01

Background: I represent the West Coast Pelagic Conservation Group (WCP). Although our primary long-term interest is small pelagic species, our present focus is on cooperative research in concert with NOAA's Southwest Fisheries Science Center (SWFSC). Our members, both fishermen and processors, harvest, and process sustainable seafood from every major fishery in the three West Coast states and Alaska. Our processors have the five largest operations on the West Coast north of San Francisco. Combined with our fishermen we represent over 4000 jobs and supply millions of pounds of sustainable seafood to the US and the world. This is accomplished with one of the lowest carbon footprints of any food industry per pound of protein.

At a time when the United Nations and other studies predict increasing magnitudes of people in lower income brackets of the world, and the U.S, will not have enough to eat the US fishing industry can contribute a significant amount of nutritious protein to help fill this void on a sustainable basis. With the advent of the COVID pandemic it quickly was apparent that global food supply chains that were thought invulnerable, are in fact, very fragile. This is important, as US food security is critical to the nation's general welfare and that of its citizens.

The Magnuson-Stevens Conservation Act (MSA) was created in part to establish the Americanization of our US fisheries and to secure our coastal waters' seafood supply for the benefit our entire nation. Although MSA did not establish fishing rights, it created a legalized platform of stringent governance to sustain the US fisheries resources, and to generate an economically compatible, and stable regulatory management structure that would allow US citizens to securely invest in the sustainable harvest of our nation's bountiful supply of seafood. From that genesis, and with new confidence, loaning institutions financed fishermen and processors with billions of dollars, to implement a restructuring of the US seafood industry. The US industry now produces billions of pounds of seafood, employs millions, and feeds our nation and the whole world. To destroy that legalized structure and usurp this centuries old activity by industrializing our oceans would be a dissolute injustice to American citizens, and the investors and workers who built the seafood industry. To lose our fisheries would be a national impairment to our nation's food security.

Our commentary: First, we incorporate, and support by reference the comments supplied by the Responsible Offshore Development Alliance RODA on the Preliminary Assessment of Economic Benefits of Offshore Wind as well their comments to the CEC on Permitting.

While WCP concurs that we must take action to combat climate change there are better alternatives than Offshore Wind Energy (OSW), i.e., Small scale modernized nuclear. New technology for nuclear power will prove cheaper and more reliable than OSW and operate continuously on a "demand" basis. This means you aren't required to overbuild the electricity generation equipment by factors of forty to fifty percent to ensure there is adequate capacity for peak demands and to cover periods of low wind speeds. Smaller scale nuclear power generated can be place in containers and placed locally to reduce transmission costs and wildfires.

If OSW is to be pushed forward, it is both reckless and irresponsible to do so at the expense of the US seafood industry that produces billions of pounds of sustainable food and billions of dollars of employment income. This will remove incomes from many coastal communities, force the US to import more seafood from countries that have little regard for sustainable harvest practice or environmental damage, and it will strand and degrade capital valuation in hard assets that will no longer have "asset markets" as these assets will no longer be of use. The total amount of money being considered as compensation for this change of economies is minimalistic at best, and demonstrates the lack of comprehension of the realistic value of the US fisheries writ large. Seafood resources and harvest economics are sustainably managed for the future. Today's management systems and investments are being consummated to assure continuous harvest long into the future.

There is another factor that requires consideration. That is the effects FOSW will on ocean meteorology, hydrology, and ecological function all of which are interconnected. The California Current Ecosystem (CCE) is a bottom-up food conveyor belt. It begins with upwelling dynamics but is dependent on temperature, thermocline stratification, salinity, and other factors. The CCE ranks as one of the four most productive major currents on the planet. The energy that

drives this process is wind. Ocean meteorological dynamics drive hydrological dynamics, which in turn drive ecological function. This is a complex tapestry of interwoven forces which in the US has not yet been challenged by large scale industrialization that utilizes the same energy source as the ecosystem.

Phytoplankton and algae blooms that develop from this hydrological process are the support system for all higher trophic marine taxa from krill to blue whales. Phytoplankton is also one of the planet's premier leaders in sequestering carbon dioxide. Phytoplankton's role is foundational to all ocean life including endangered and protected marine species.

The fact is there is little research that has led to any conclusive comprehension of how the CCE will react to the physical presence of a fully scaled-out OSW occupied ocean. Neither is there, solid data on what removal of wind energy will mean for ocean productivity. The Columbia River was viewed as the ultimate venue to produce hydropower. Fish ladders and hatcheries were to compensate for some minor loss of salmon runs. No one did the hard analysis but then, like now, fishermen and processors were at the forefront protesting the government's careless and uninformed actions. If something goes badly in the CCE it could make the Columbia River salmon run fiasco appear to be a minor hiccup.

This is the reason the fishing industry and many e-NGO's have lobbied and given comment to a two-tiered NEPA process whereby there is

1. First a Programmatic Environmental Impact Statement that among other regional analyses calculates cumulative impacts on a fully scaled out regional basis, i.e.,
2. Followed by a second project by project EIS that focuses on the individual characteristics of the individual locale and the technical nature of the wind project.

BOEM has stated time and again that they cannot do a PEIS without knowing the technical impacts of the individual projects. But so far BOEM and developers say they can't do a regional cumulative impact study on based on one project. This is circular logic. With the amount of data, superior computer modeling programs that exist, and artificial intelligence this could be teed up, and accomplished quickly. If there are missing gaps of research this should be addressed by adequate funding and staffing. With the CCE there is too much at stake to gamble on the guesswork and assumption approach BOEM is using now.

The Bureau of Ocean Energy (BOEM) and the administrations at the federal and California levels are planning to cut the regulatory process to "streamline" development. We think that is an imprudent idea. Given that development will likely stall out due to supply chain issues anyway, we recommend using that time to better research and analyze some of these questions on the ecosystem and better analyze what impacts are likely for the entire US fishing industry. NREL and BOEM's platitudes on the subject carry no weight and minimal credibility.

An obvious question that is being ignored is: How will the job distribution created by OSW benefit those ports that do not have the space for the necessary OSW infrastructure to assemble or manufacture OSW machinery components, nor the harbors to stage the platforms before they go to sea. This and the loss of fishing and processing jobs absolutely need to be

fully costed by independent sociologists and economists. When costs for fishermen, processors, and communities have been fully itemized they should be weighed against the benefits that will come from OSW development to all entities and people who have the losses. In addition, these costs need to be fully compensated over a timeline of at least one generation and cover losses of stranded capital assets and incomes of all affected parties. This must be regulated by an independent party I.e., NOAA Fisheries and not administered by the developers on a case-by-case basis. Remuneration should be calculated for full deployment of the wind farms to farthest-out future goal date, which as we understand would be 2050.

Thank you,
Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Okoniewski". The signature is fluid and cursive, with the first name "Mike" and last name "Okoniewski" clearly distinguishable.

Mike Okoniewski
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C.c. Greg Shaughnessy:
VP, West Coast Pelagic Conservation Group (WCP)