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County of San Luis Obispo and REACH AB 525 Comments

Additional submitted attachment is included below.

April 22, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: Comments on the Assembly Bill 525 Offshore Wind Strategic Plan

Dear California Energy Commission:

Thank you for the opportunity to comment on the Draft Commission Report: Assembly Bill 525 Offshore Wind Strategic Plan. With the Morro Bay Wind Energy Area located off the Central Coast, the region has a significant interest in offshore wind development and has a history of collaboration on energy initiatives. We provide initial comments here on the CEC's draft report and look forward to deeper collaboration as a next step as the state begins implementation of its strategic plan.

Central Coast Activities to Date

There has been extensive community planning and collaboration in parallel to the AB 525 efforts to prepare for offshore wind on the Central Coast, including:

- In 2021, the County of San Luis Obispo adopted a [resolution](#) and regional leaders issued a [joint letter](#) to Governor Newsom and President Biden committing to proactive planning on offshore wind and seeking state and federal funding to advance port infrastructure feasibility studies.
- In 2022, REACH, in partnership with the County of San Luis Obispo, County of Santa Barbara and City of Morro Bay, conducted and released a [Central Coast Emerging Industries Waterfront Siting and Infrastructure Study](#) outlining options to enhance regional waterfront infrastructure, complementing state and West Coast wide studies conducted by the State Lands Commission, Bureau of Ocean Energy Management (BOEM), and National Renewable Energy Laboratory.
- In late 2022, Central Coast government, education and civic leaders issued an [open letter](#) to the winners of the BOEM auction of the Morro Bay Wind Energy Area expressing a commitment to collaborate on issues including waterfront and transmission infrastructure, workforce and supply chains, research and innovation, and community partnership.
- Over the past year there has been extensive dialogue and planning among local stakeholders, with industry, and with state and federal agencies across a wide range of offshore wind topics. The County of San Luis Obispo is moving forward to advance operations and maintenance (O&M) waterfront infrastructure planning efforts under a \$1 million allocation by the legislature and expects to receive \$750 thousand under a separate allocation by the legislature for offshore wind resourcing needs.

As we look to this next chapter, we are eager to elevate regional-state coordination to ensure there is a collaborative effort on offshore wind issues related to the Central Coast. This will also require sustained funding to support the growing level of engagement by regional stakeholders in leading and contributing to various offshore wind projects and work streams.

Key Considerations

Waterfront Infrastructure

We are actively working towards developing the Central Coast as an O&M hub for offshore wind. A key finding of the Central Coast Emerging Industries Waterfront Siting and Infrastructure Study was that *“Small Facilities [i.e., for operations and maintenance and installation support] within the study area will be required to support wind farm operations within the current Lease Areas.”* Given the critical role that ports and harbors in San Luis Obispo County are likely to play in essential O&M activities and potentially earlier in site surveys and installation support, state partnership and resourcing in this effort will be key to meeting anticipated timelines for offshore wind deployment.

Following the completion of the earlier study, the region is now actively working towards launching its next phase of planning. The County of San Luis Obispo was allocated \$1 million by the legislature for further port infrastructure efforts, providing an initial opportunity to support regional ports and harbors to advance planning. As we noted in [comments last year](#) on the Offshore Wind Waterfront Facilities Improvement Program, funding from this program and other state and federal programs will be critical to supplement and build on this next phase of regional planning work. We recommended the CEC set criteria that will enable flexibility for applicants to integrate state funding into existing regional efforts, such as by providing flexibility to ensure program funds can align with and support regional efforts, prioritizing applicants with small/mid-sized waterfront infrastructure facilities, and prioritizing support for O&M efforts.

Transmission and Supporting Infrastructure

As we noted in our open letter to the leaseholders, there is an existing array of other Central Coast infrastructure including transmission lines, office and technology parks, industrial areas ripe for reuse, manufacturing sites, airports, and other facilities in close proximity to the lease areas. Significant state investments in infrastructure expansion and upgrades will be necessary to ensure that the Central Coast is able to accommodate the energy generated by the future projects and support the array of activities needed to operate these offshore assets.

Workforce

The Central Coast has a world-class workforce and business community that is ready to get to work in support of the development of offshore wind and related infrastructure. This pool of talent is fed by top-ranked universities and community colleges that coordinate closely with industry, strong K-12 schools and innovative apprenticeship programs. We look forward to close coordination with state agencies to ensure our education and workforce systems can respond nimbly to support the emerging workforce needs of this new sector.

Research and Innovation

The Central Coast projects will be the first and largest commercial scale floating offshore wind initiative in the United States. Our region is eager to partner to advance the frontiers of this new technology while also assessing and addressing the environmental, social and other impacts of offshore wind. We are fortunate that these projects will take place within close proximity to some of our state’s leading engineering, environmental, and academic centers including Cal Poly San Luis Obispo. Work is well

underway on the Central Coast to build out a broader clean tech innovation hub, which was spurred by regional planning related to the future co-use and reuse of Diablo Canyon. The state has a unique opportunity to leverage these first projects to ensure it is the global leader in the R&D behind this new industry and ensure these projects set a model and provide lessons for other offshore wind initiatives in California and worldwide. We welcome further collaboration with the state to take advantage of this important opportunity and attract further investment to advance research and innovation associated with the floating offshore wind sector.

Community Engagement and Partnership

Implementation of AB 525 will require strong community partnership and public engagement. While the lease terms and community benefit agreement bidding credits provide an initial platform for broader partnership with the Central Coast community, projects of this scope and complexity will require extensive and thoughtful engagement and trust-building among all stakeholders before and throughout operations, including close engagement with our region's fishing community and tribal stakeholders. As every agency, organization and process has its own stakeholder engagement and public communication requirements, proactive coordination by state and federal agencies and industry with the Central Coast will be essential to avoid confusion and build towards a true collaborative effort and dialogue.

Thank you for your consideration of these comments. We look forward to working with the CEC to advance these important efforts.

Sincerely,



Rebecca Campbell
County Administrative Officer (Acting)
County of San Luis Obispo



Melissa James
President/CEO
REACH