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*Comment Received From: Jean Johnson
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CA OSW Strategic Plan Comments

Additional submitted attachment is included below.

California Energy Commission
Docket No. 17-MISC-01
715 P Street
Sacramento, California 95814
Re: AB 525 Strategic Plan Comments

Dear Chair Hoschild and Commissioners:

I am a resident of Morro Bay and offer the following observations regarding the proposed Offshore Wind Strategy for California and its potential impact on the town and harbor of Morro Bay.

Economic and Workforce Benefits

The proposed Operations and Maintenance facility for the Morro Bay harbor would almost certainly have a net negative impact on the economy, finances and labor force participation of the town. The transformation of the port into a facility that would accommodate and service large service operation and crew transfer vessels would displace dozens of existing businesses and facilities that currently serve visitors (as well as residents) and fundamentally change the character of the Morro Bay harborfront.

Development of an offshore wind port would transform Morro Bay's small harbor from being recreation and tourism-oriented with restaurants, hotels, ecotourism businesses, parks, tourist walkways, and retail shops to being an industrial facility with a massive concrete pier and wharves with cranes, trucks and helipads; warehouses; large-scale boat servicing facilities and round-the-clock vessel activity. The disruption created during the multi-year port construction phase would be particularly harmful as it would entail street closures and re-routing; massive demolition; noise; and potential air and water contamination in a small area.

A major transformation of the Morro Bay harbor, waterfront and Embarcadero would inevitably drive visitors to less industrial venues on the Central Coast and elsewhere. Given that the economy of Morro Bay and the finances of the city are based on tourism, there would also be the potential loss of hundreds of local jobs, as well as a decline in city services due to decreased lodging and sales tax revenues.

These losses would by no means be compensated for with additional O&M center jobs which are estimated at around 120. The city's financial losses would also not be sufficiently mitigated by the "Community Benefits Agreement" commitments among the three Morro Bay leaseholders which total \$27 million; are over 33 years; and would be distributed among many communities.

Port and Waterfront Infrastructure

The report is clear in maintaining that efforts will be taken to prevent, minimize or mitigate losses to the coastal and marine resources of California. The Morro Bay harbor is a nationally recognized estuary under the National Estuary Program which is dedicated to the monitoring and improvement of these critically important ecological zones. Estuaries are buffer zones between freshwater creeks and rivers and the ocean which function as important nurseries for the breeding of numerous animal and plant species.

This is particularly important in serving as habitat for the southern sea otter, who use the sheltered area in the Morro Bay harbor as an area to remain protected during breeding and nursing of their pups which occurs year round. It should be noted that this is one of the most visitor-accessible points along the California coast to view this popular animal.

Southern sea otters and their “critical habitat” are still recovering from near-extinction and are protected under the Endangered Species Act, the Marine Mammal Protection Act and also under California state law, by the state’s Marine Life Protection Act. As a keystone species, otters play a fundamental role in the natural food web and keep vital aspects of coastal ecosystems like kelp forests and eelgrass beds in balance by feeding on species such as sea urchins that can overgraze kelp these beds. These seagrasses play an essential role in providing habitat for numerous invertebrate and fish species, reducing coastal erosion and storing carbon that serves to moderate climate change.

The construction of an Operations and Maintenance port would require massive dredging of the harbor bottom and sand spit. This would occur in the same area where the otters primarily congregate at the navigable mouth of the harbor, a small area measuring approximately 1200 long by 50 yards wide. This activity, as well as pile driving and other construction activities would significantly disrupt their breeding and rest. It would also have a major impact on many other bird, marine and plant species (including 11 other listed endangered species) that depend on this protected estuary environment. . Once the port come into service, there would also be potential air, water, noise and light pollution from the frequent traffic and servicing of these large ships.

Leaseholders are currently estimate offshore wind capacity of 6.8 GW for the Morro Bay call area, a significant increase from the earlier 3 GW estimate. Using current 15 MW wind turbine technology, this equates to over 450 wind turbines off the coast. The amount of vessel traffic needed to service this number of turbines would crowd out current recreational, fishing, sailing, paddleboarding, kayaking and ecotourism activity in the small harbor.

The California port feasibility study notes that \$11.7 billion in investment by federal, state, local and private parties will be needed to develop adequate port infrastructure to support the state OSW plan. However, only \$45 million has been allocated by the state to date. Even with the proposed \$1 billion proposed bond for port buildout, there is a huge funding gap. This is also occurring during a time of state and federal budget shortfalls and high interest rates, leading to lower potential funds availability.

Also, it is considered essential that the Staging and Integration ports planned for Long Beach and Humboldt harbors be constructed before any O&M or manufacturing port locations. Those require almost \$2B in funding and should be finalized before additional O&M port work proceeds elsewhere. There should be no disruptive surveying or construction activity undertaken that might be taken to be abandoned part-way through, due to lack of full funding.

In summary, the benefits of the proposed CA OSW plan are much less than the economic and ecological costs that would be borne by the Morro Bay community and environment. I urge that the Commission rigorously re-examine their assumptions in this regard.

Jean Johnson