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California Energy Commission  
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February 10, 2023

Re. Commission Report: Developing a Permitting Roadmap for Offshore Wind Energy Development off the Coast of California

Dear Chair David Hochschild, Commissioners, and Staff,

Please accept the following comments on the California Energy Commission's (CEC) report, Developing a Permitting Roadmap for Offshore Wind Energy Development off the Coast of California.

The Alliance of Communities for Sustainable Fisheries (ACSF) is a 21-year-old 501-c-(3) not-for-profit educational organization, founded for the purposes of connecting fishermen with their communities. It also represents fishing interests in state and federal processes. The ACSF is a regional organization, with commercial fishing leader representatives from Monterey, Moss Landing, Santa Cruz, Morro Bay, and Pillar Point harbors, and Port San Luis, on our Board of Directors. The California Wetfish Producers Association (squid, sardines), port communities, and several recreational fishing organizations 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 near the Morro Bay Wind Energy Area (WEA).

The ACSF believes that the Permitting Roadmap for Offshore Wind (OSW) is the right place to identify when and how mitigation-compensation will be addressed by the state for impacts caused by OSW.

Please recall that seventeen California port-based commercial fishing organizations sent a letter (November 29, 2022) to the state agencies which are involved in OSW planning and/or permitting. This letter requested that these agencies use all available authorities to AVOID, MINIMIZE, and MITIGATE, as much as feasible, harmful effects of OSW on fisheries and the environment. The letter further requested the state's assistance in obtaining a fair deal for fishermen and our communities for compensation-mitigation, with a target of an OSW industry-to-Fishing industry "Fisheries Community Benefit Agreement" (FCBA). The purpose of the FCBA will be to sustain and enhance fisheries' economic resilience.

We respectfully request that the Permitting Roadmap for OSW include the following concepts:

- 1) The CEQA review, presumably led by the State Lands Commission (SLC), should include the full reach of the project's impacts, including in federal waters, and not be limited to electrical cable transmission issues in state waters. Even if not required by CEQA, we believe this review should contain a full socioeconomic analysis of the immediate, long-term, and cumulative impacts of OSW on California's fishermen and their communities. It is clear to California fishermen that BOEM will not conduct such a comprehensive impacts study.
- 2) The Permit Roadmap should identify a time, before leasing, when at the request of the state BOEM conducts a full programmatic EIR that includes all future, potential California Call Areas.
- 3) The Permit Roadmap should identify the point at which the State Lands Commission permits, or authorizes, leases, for OSW related development in state waters, to include a condition requiring OSW developers to provide compensation-mitigation satisfactory to both the Commission and the fishing industry.
- 4) We ask that the California Coastal Commission (CCC) and all other state agencies with permit authority over any aspect of OSW development, coordinate their efforts to assure that mitigation concepts, including environmental and compensation-mitigation, be included as enforceable conditions on BOEM and/or the OSW developer(s). Most obviously, this will include the CCC's Coastal Zone Management Act certification and coastal development permit processes.

- 5) Since economic impacts to commercial fishing operations from OSW will begin immediately in the Site Evaluation phase, the state should assert its authority to secure a FCBA at the first opportunity.
- 6) The CEC may want to include Coastal Zone Management Act determinations as the first step in its Permitting Roadmap.

The ACSF believes that these steps should be clearly identified in the state's Permitting Roadmap.

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



Alan Alward, Co-Chair

CC

State Lands Commission

Coastal Commission