

CALIFORNIA FISHERMEN'S RESILIENCY ASSOCIATION

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Bureau of Ocean Energy Management

BOEM Docket # - 2022-0017

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CFRA Comments - BOEM, Oregon Draft WEA's

In January 2022, seven Northern California Port Commercial Fishermen's Associations formed the California Fishermen's Resiliency Association (CFRA), a California Nonprofit Mutual Benefit Corporation. The California Fishermen's Resiliency Association now serves as a "point of contact" and negotiator for fishermen with developers of offshore wind power, telecommunication and energy transmission subsea cables, and offshore mineral extraction projects. The CFRA represents all fisheries and gear types through its member fishermen's associations which include the ports of Crescent City, Trinidad Bay, Shelter Cove, Fort Bragg/Noyo, Bodega Bay, San Francisco, Half Moon Bay, Santa Cruz and Santa Barbara. The CFRA is funded by an Ocean Protection Council grant from the State of California.

The CFRA is structured to encourage statewide cooperative policies and protocols related to offshore wind power and cable projects in a way that protects fishermen and fishing communities from impacts that result from these developments and allows California to move towards realistic renewable energy goals statewide.

Our Comments

The CFRA is in full agreement with the statements concerning the Oregon Draft WEA's submitted by the Pacific Fisheries Management Council and RODA. Our additional concerns are as follows:

Fishermen continue to oppose the siting of OSW project on community fishing grounds

Cumulative Impacts of OSW Developments

The Oregon Draft WEA's, especially the Brookings WEA will significantly contribute to the cumulative impacts of both Oregon and Northern California fishermen through: displacement from traditional fishing grounds, crowding on remaining fishing grounds and increased OSW traffic through existing and future fisheries. The Port of Humboldt Bay, a major fishing port in Northern California, is now the focus of OSW developers for assembly, maintenance, and storage of turbine units for West Coast states. Initially, the first OSW project for Humboldt County was for seven floating turbine units, then it was eleven, then seventeen. Now, it is two hundred turbines with an assembly and "wet" storage area for all the proposed experimental turbines in California and Southern Oregon! We were told that the largest turbine unit had a waterline beam of 300' and maxed out at 850' of height. Now the latest statistic is for a turbine with a 400' beam and 1100' of height. Honestly - who thinks of this stuff? Where are the brakes — the rational thinking, logically taking small incremental steps, instead of jumping into the boiling cauldron feet first and hoping that things will be okay.

Limit the Experiment

The CFRA submitted the following public comments at a joint State and Federal agency meeting on July 14, 2022 concerning the experimental nature of deep water offshore wind power generation. "The Morro Bay and Humboldt WEA's should be classified as "experimental demonstration projects" and be required to actually produce and export to the shoreside power grid at a commercial scale for three years before any additional WEA's are proposed for California, Oregon or Washington States". The CFRA requests the delay of any additional West Coast wind energy projects until we (collectively) can be shown that these experimental systems actually work and produce insignificant negative environmental impacts. This position is supported by sixteen California Fishermen's organizations in two letters addressed to BOEM and California State agencies.

Deficient Environmental Assessment - Seabirds

The environmental reporting for the two BOEM Oregon draft Wea's is deficient in its coverage of negative impacts to seabirds and specifically, endangered seabirds. For example, the Pacific short-tailed albatross is a listed endangered species and occurs off the Oregon Coast. All West Coast commercial fisheries of any gear type can "take" no more than two short-tailed albatross in a two-year period. To do so will result in the closure of that particular fishery. Where is the narrative describing the likely interactions of albatross, shearwaters, fulmars and petrels with OSW turbines? If there is a single "take" of a short tailed albatross by OSW equipment or operations, will BOEM rescind the lease and terminate the project? If not - why?

Deficient Environmental Assessment - Upwelling Impacts

At present in Northern California and Southern Oregon, BOEM has designated one Northern California WEA (Humboldt) and two Oregon's WEA's (Brookings and Coos Bay), with additional proposed areas in Northern California (Crescent City and Shelter Cove) showing up on the charts. Each of these WEA's, if built out with wind turbine arrays, will extract energy from

the U.S. West Coast wind environment. This energy is not "free"; it is not just the useless movement of air on the planet, but instead an environmental process responsible for the driving of the West Coast ocean currents through spring, summer and fall months to create upwelling in the highly productive California Current Ecosystem. Each turbine will produce a leeward effect of significantly lower wind velocities. Lower wind velocities equates to reduced upwelling. Scientific studies for the proposed Morro Bay WEA show downwind velocity loss extending south past San Miguel Island! BOEM environmental assessments fail to address the massive cumulative impact of strings of wind power arrays, with hundreds of turbines each, progressively robbing the wind-driven upwelling process of energy and impacting an area extending from Coos Bay to nearly Point Arena (270 nautical miles). Where are the studies to carefully assess potential long term damage to the California Current System Ecosystem by energy extraction? What has happened to the "precautionary principle" approach that is constantly invoked in fisheries regulation and management?

Summation

Maybe, rather than throwing caution (and common sense) to the literal, real "wind", we as a nation should slow down in our rush to industrialize an ocean system we have yet to understand and again - treat the two California Wind energy areas as experiments to better understand the unknown consequences of rampant energy mining in the ocean environment.

Thank you for the opportunity to comment.

Ken Bates, Executive Director
California Fishermen's Resiliency Association

Crescent City Commercial Fishermen's Association
Trinidad Bay Fishermen's Association
Shelter Cove Fishing Preservation, Inc.
Salmon Troller's Marketing Association of Noyo
Bodega Bay Commercial Fishermen's Association
San Francisco Crab Boat Owners Association
Half Moon Bay Commercial Fishermen's Association
The Alliance of Communities for Sustainable Fisheries
Commercial Fishermen of Santa Barbara
California Wetfish Producers Association
Santa Cruz Commercial Fishermen's Association

