



October 25, 2023

Mr. Paul Michel
NOAA Office of National Marine Sanctuaries
99 Pacific Street, Suite 100F
Monterey, CA 93940

Comments by *Offshore Wind California* to the National Oceanic & Atmospheric Administration
(NOAA) Regarding the Proposed Chumash Heritage National Marine Sanctuary (CHNMS)
NOAA-NOS-2021-0080-1228, submitted via regulations.gov

Dear Mr. Michel:

Offshore Wind California ([OWC](#)) welcomes the opportunity to provide comments to the National Oceanic and Atmospheric Administration (NOAA) regarding the proposed Chumash Heritage National Marine Sanctuary (CHNMS). OWC recognizes the value of designating waters off the Central Coast as a national marine sanctuary to preserve the unique and diverse ecosystems essential to the heritage of the Chumash Tribe and other Tribal nations. These waters have special national significance due to their historic, archaeological, cultural, aesthetic, and biological resources.

OWC and the offshore wind industry also appreciate the years of hard work, collaboration, and cooperation by the Department of Interior, Bureau of Ocean Energy Management (BOEM), Department of Defense, Department of Energy, NOAA, State of California, state and federal lawmakers, and Tribal nations, to address and resolve key sea-space and other issues to enable *both* the deployment of offshore wind and its undersea transmission in federal and state waters, along with the designation of the CHNMS off the Central Coast of California. OWC and our members are committed to the principle that responsible development of offshore wind in California is compatible and can coexist with other ocean users and entities and ocean conservation.

We appreciate collaborative efforts across federal, state, and local government to balance the goals of the sanctuary with the establishment of offshore wind. To deliver its benefits for California, it is vital that offshore wind projects in the Morro Bay Wind Energy Area (WEA) be able to connect to the power grid at both Morro Bay and Diablo Canyon to give Californians full access to the clean energy they need from floating offshore wind turbines.

To achieve that, OWC and the offshore wind industry support NOAA's decision to ensure there is geographical alignment of the proposed CHNMS with the boundaries of the Morro Bay WEA located 20-40 miles off the Central Coast. To bring the gigawatts of clean offshore wind electricity onshore, however, NOAA also must take into account the need to provide access for undersea cables to transmit power from the WEA to interconnection points on the Central Coast. BOEM has the responsibility to oversee and approve such access for offshore wind leaseholders, but BOEM doesn't have explicit authority to issue permits for underwater easements through marine sanctuaries. Nor has this authority been previously exercised by NOAA for offshore wind leaseholders.

BOEM [requested](#) this issue be addressed during NOAA's January 2022 comment period, with similar [feedback](#) provided by American Clean Power – California (ACP-CA) and OWC on behalf of the industry. NOAA answered with a proposed solution for a Preferred Agency Alternative that adjusted the proposed CHNMS boundaries to provide a relatively narrow corridor outside the sanctuary's borders to allow undersea cables to export offshore wind electricity onshore. Concerns remain, however, including regulatory and legal uncertainties about whether this alternative will provide access to both Central Coast interconnection points, and critical questions are left unanswered about how electrical cables can be permitted through the sanctuary.

OWC and our members agree with ACP-CA that a viable solution will likely entail significant economic impacts for offshore wind projects, and that an adaptive, flexible, and data-driven sanctuary management solution is required to address the permitting authorizations and designation of corridor boundaries, which are not fully known at this time.

OWC requests that NOAA work closely with the offshore wind industry, BOEM, and the Bureau of Safety and Environmental Enforcement (BSEE) to identify and designate appropriate approaches that incorporate industry data into the siting of necessary transmission corridors and enable transparency and certainty in the management of transmission installation, monitoring, and decommissioning activities.

OWC is committed to working with NOAA, BOEM, BSEE, the Tribal nations, and other key stakeholders through the ongoing regulatory process to reach a solution that allows offshore wind's clean and affordable power to be delivered to California residents and ratepayers. We support an outcome that protects and preserves California's coastal and cultural resources, while at the same time enabling California's offshore wind industry to help the Golden State meet its climate, clean-energy, and grid-reliability goals.

We encourage NOAA to recognize that this is the first marine sanctuary designation to include significant renewable energy activities within the proposed boundaries. The associated siting, installation, and eventual decommissioning of floating offshore wind will occur over three decades. The full life cycle of offshore wind development differs from other industries in California and other U.S. waters, as this is the first region to see the deployment of floating offshore wind. The uniqueness of floating offshore wind will require innovative sanctuary permitting and management and approaches to federal coordination within the CHNMS boundaries.

To help make that a reality, we also request that at least three seats on the CHNMS Advisory Council be reserved for offshore wind industry representatives, to help inform the Council of the needs and concerns of offshore wind as well as those of the sanctuary. The designation of the CHNMS Advisory Council should be appropriately balanced between voting and non-voting (government) members that provide equal representation of interests and ocean users. In addition, we recommend that BOEM, BSEE, and the U.S. Geological Survey hold non-voting seats, along with key offices in NOAA, such as the National Centers for Coastal Ocean Science (NCCOS), that can support the development of a data-driven management process.

We believe taking an adaptive, data-driven approach to managing this relationship is the best way to learn from ongoing inputs and successes and to build a robust, mutually beneficial long-term partnership between offshore wind and the CHNMS. OWC supports and is aligned with the comments submitted by ACP-CA, notably about the need for permitting certainty and creative solutions in the final sanctuary designation and subsequent process for management that enables successful deployment and accounts for the full life cycle of offshore wind.

The unique diversity of OWC members, in particular its supply chain, technology, and engineering firms, as well as developers, can bring valuable technical expertise on how floating offshore wind is planned and executed to inform those needed creative solutions. This includes expertise on siting, such as geophysical surveys, environmental assessments and mitigations, vessels, and end-to-end design and execution for installing and decommissioning transmission cables, that will be important for ensuring that adequate corridors and points of interconnection are available for current offshore wind leases in Morro Bay and future planned sales for California.

Finally, OWC applauds the Biden-Harris Administration for pursuing these complementary goals of conserving and restoring ocean and coastal habitats and advancing offshore wind. Indeed, developing offshore wind along with NOAA's sanctuary expansion will help achieve two key goals of the Biden Administration – to conserve 30% of the nation's ocean areas by 2030 and also deploy 30 gigawatts (GW) of offshore wind by 2030.

California knows how to be a leader on climate, clean energy, and coastal conservation. OWC and our members remain eager to work in partnership with the CHNMS to demonstrate that leadership and realize the benefits of offshore wind and this new marine sanctuary for all Californians.

Sincerely,



Adam Stern
Executive Director
Offshore Wind California