May 16, 2022

Office of the Environment
Bureau of Ocean Energy Management
Office of Strategic Resources
760 Paseo
Camarillo, California 93010

Submitted via regulations.gov; Docket No. BOEM-2021-0044

Re: Request for Comments on Outer Continental Shelf offshore Morro Bay, California Wind Energy Area, Draft Environmental Assessment

The American Clean Power Association ("ACP")[1] and Offshore Wind California (OWC)[2] welcome the opportunity to provide comments on the U.S. Bureau of Ocean Energy Management's ("BOEM") Draft Environmental Assessment ("Draft EA") for Commercial Wind Lease and Grant Issuance and Site Assessment Activities on the Pacific Outer Continental Shelf, Morro Bay Wind Energy Area ("WEA").[3] We support BOEM's intent to further the early actions and progress it has taken in the Morro Bay WEA to meet the Biden Administration's national goal to deploy clean energy and combat the threat of climate change. In our past comments,[4] we have fundamentally supported BOEM's proposed scope of analysis and intended

[1] American Clean Power represents the renewable energy industry in the United States, bringing together over 1,000 member companies, 120,000 members, and a national workforce located across all 50 states. By uniting the power of wind, solar, storage, and transmission companies and their allied industries, we enable the transformation of the U.S. power grid to a low-cost, reliable, and renewable power system. Additional information is available at http://www.cleanpower.org

[2] Offshore Wind California promotes policies and builds public support for responsible development of offshore wind power in California. As a coalition of industry partners, our members are dedicated to providing an independent voice and industry expertise to facilitate offshore wind deployment off California's coast. OWC engages in public education and advocacy in support of this renewable resource as part of a comprehensive solution to California's energy needs. Additional information is at https://www.offshorewindca.org

[3] Request for Comments on Draft Environmental Analysis of Central California Offshore Wind Energy Area (Apr. 6, 2022), https://www.regulations.gov/document/BOEM-2021-0044-0128.

[4] We incorporate by reference our earlier comments on this matter. See ACP Comment in Response to Public Scoping of Environmental Assessment for BOEM Leasing Activities in the Morro Bay Wind Energy Area (Jan. 11, 2022),. BOEM-2021-0044-0104, https://www.regulations.gov/comment/BOEM-2021-0044-0104; ACP Comment in Response to Call for BOEM Leasing Activities in the Morro Bay Wind Energy Area (Sept. 13, 2021), BOEM-2021-0044-0034, https://www.regulations.gov/comment/BOEM-2021-0044-0034.

activities. We believe this Draft EA is consistent with BOEM's intended activities, and we largely support the analysis and conclusions reached in the EA to support designation of the Morro Bay WEA.

ACP and OWC generally agree with the scope of BOEM's Morro Bay Draft EA, and requests that BOEM work closely with NOAA's Office for Coastal Management ("OCM") to ensure that the CCC's Federal Consistency Review of the Morro Bay lease sale remains within this scope. As noted below, the scope could be expanded to include the vessel traffic that will result from surveying potential cable routes. ACP and OWC agree that BOEM should continue to limit activities in the EA to site assessment and surveying, consistent with case law and previous BOEM analyses. We offer the following comments to inform BOEM's finalization of the Morro Bay EA.

BOEM should consider broader cable corridor survey activities in the scope of the Morro Bay EA.

Lessees of the Morro Bay WEA will need to conduct site characterization of both the WEA and areas outside the WEA. The draft EA acknowledges this fact: "this EA analyzes BOEM's issuance of 1-3 leases within the Morro Bay WEA, as well as the issuance of easements and grants associated with each lease for subsea cable corridors and areas for associated offshore collector/converter platforms."[5]

An example of characterization activities that will occur outside the WEA is surveying of potential cable routes to evaluate geophysical and geotechnical conditions, including hazard and exclusion zones. The main studies required for potential cable routes include preliminary cable route and landing site assessments, cable burial risk assessments, and submarine cable studies., including potential cable routes to shore.

BOEM should consider site assessment and characterization activities that will occur outside the WEA, and that it analyzes the potential environmental impacts associated with these activities, where applicable. In places, the draft EA analysis of environmental impacts

[5] Morro Bay Draft EA, Section 2.1.

appears inconsistent in its geographic scope. For example, BOEM states that "[v]essel activity will primarily take place between 20 and 50 mi offshore…"[6] This statement should be clarified to acknowledge the extent of vessel activity requires to characterize areas outside of the WEA (i.e. characterization of potential cable routes), as well as vessel activity associated with travel to and from the WEA.

California Needs Offshore Wind to Reduce the Impacts of Climate Change and Maintain a Resilient Power Grid

ACP and OWC applaud President Biden for advancing environmental review in the Morro Bay WEA, which is an important step in reaching the Administration's national offshore wind goal of 30 gigawatts (GW) by 2030.[7] This is an important step in reaching California's goals. On May 6, the CEC released a draft report specifying its preliminary offshore wind planning goals – 3 GW by 2030, 10-15 GW by 2045, and potentially up to 20 GW by 2050. These ambitious multi-GW goals represent an important milestone for the state's offshore wind industry, demonstrating that California is serious about "going big" on floating offshore wind to drive economies of scale and realize the substantial jobs, climate, and clean power benefits from responsibly developing this renewable energy resource. The goals sent an important signal to the industry and other state and federal agencies that California is committed to moving forward expeditiously to make offshore wind power a reality. This includes the federal lease auction this fall and planning for ports, transmission, procurement, additional call areas, workforce development, and a sustainable supply chain to jumpstart the state's offshore wind industry.

The ultimate goal is to develop a thriving, world-leading floating wind industry and make offshore wind a key part of California's diverse clean power portfolio, while also protecting the state's marine and coastal resources. The offshore wind potential off California is massive: a recent National Renewable Energy Laboratory study found there are 201 GW of technical

[6] Morro Bay Draft EA, Section 3.2.2.5.
[7] White House Fact Sheet: Biden Administration Jumpstarts Offshore Wind Energy Projects to Create Jobs (March 29, 2021) https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/29/fact-sheet-biden-administration-jumpstarts-offshore-wind-energy-projects-to-create-jobs/.

potential for offshore wind off the coast of California.[8] Realizing even 10 or 15 percent of this potential would provide a massive boost to meeting California's climate goals. The recent California Supply Chain Needs Report makes clear it is possible to meet at least the SB 100 goal of 10 MW, of which Morro Bay is an important part.

Conclusion

ACP and OWC appreciate the opportunity to comment on the draft Morro Bay EA, and we look forward to continuing its active engagement with BOEM on this critical leasing process in the coming year.

Respectfully,

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[8] Available at https://www.nrel.gov/docs/fy21osti/77642.pdf.