











October 27, 2023

Paul Michel, Regional Policy Coordinator NOAA Office of National Marine Sanctuaries 99 Pacific Street, Suite 100F Monterey, CA 93940

Re: Offshore Wind Now coalition supports NOAA's Initial Boundary Alternative combined with the Gaviota Coast Extension (Sub-Alternative 5b)

Dear Mr. Paul Michel,

We represent a coalition of environmental groups, environmental justice groups, and local elected officials standing together in steadfast support of California going big on offshore wind. We work together with shared urgency around the importance of tapping into more clean energy for our cutting-edge state, as well as local, skilled and trained jobs.

We noticed recent debate about the boundary of the Chumash Heritage National Marine Sanctuary, and NOAA's proposed alternatives to reduce the sanctuary's size by 2,000 square miles, eliminate connectivity with other national marine sanctuaries, and exclude cultural sites in Morro Bay. These alternatives, that would cut into the size of this critical sanctuary, have been promoted under the justification that the full sanctuary would hinder offshore wind infrastructure development like transmission cables.

In fact, the creation of the sanctuary need not prevent offshore wind from being developed in the proposed Morro Bay Wind Energy Area. There is a precedent for submarine cables for other utility needs being laid inside marine sanctuaries, and NOAA should establish a clear process in

the sanctuary regulations for permitting electric transmission cables, for this sanctuary and potentially for other sanctuaries down the line.¹

We urge you to maintain the original boundaries of the proposed Chumash Heritage National Marine Sanctuary and to find a way to permit transmission needs for offshore wind within the sanctuary. Moreover, we urge NOAA to determine a process to permit transmission cables essential for offshore wind development without weakening protections for critical ocean habitat.

Ocean protections and offshore wind development need not be at odds with each other. California deserves both a thriving marine ecosystem and a robust offshore wind industry that provides plentiful renewable energy and green jobs throughout the state. NOAA should figure out a way to deliver on both of these priorities going forward.

Sincerely,

Laura Deehan State Director Environment California

Meghan Sahli-Wells California Director Elected Officials Protecting America

Marc Victoria
Senior Statewide Organizer
The Climate Center

Fran Pavley
Environmental Policy Director
USC Schwarzenegger Institute

Ben Smith Senior Campaigner Greenpeace USA

Eddie Anh Executive Director Brightline Defense

¹ National Oceanic and Atmospheric Administration (NOAA), "Submarine Cables & Domestic Regulation." https://www.noaa.gov/gc-international-section/submarine-cables-domestic-regulation. Accessed October 5, 2023