



September 13, 2021

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Office of Strategic Resources
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Ms. Thurston,

The Redwood Coast Energy Authority (RCEA) in partnership with Redwood Coast Offshore Wind (ROW) is pleased to submit these comments to the Bureau of Ocean Energy Management (BOEM) regarding the development of an Environmental Assessment (EA) of the Humboldt Wind Energy Area (WEA).

[Background on RCEA Development Efforts](#)

Since 2003, RCEA has been an integral part of the Humboldt County community. RCEA is a local government Joint Powers Agency founded in 2003 whose members include the County of Humboldt, the Cities of Arcata, Blue Lake, Eureka, Ferndale, Fortuna, Rio Dell, and Trinidad, and the Humboldt Bay Municipal Water District. RCEA's Board is made up of representatives of each of its members; an organization that is a true reflection of the community's character. The purpose of RCEA is to develop and implement sustainable energy initiatives that reduce energy demand, increase energy efficiency, and advance the use of clean, efficient and renewable resources available in the region for the benefit of the Member agencies and their constituents.

Humboldt County is marked by strong collaboration among its local energy, environmental, and economic professionals and possesses natural features that make it a steppingstone for the offshore wind energy industry on the West Coast of the US. With average wind speeds of more than ten meters per second, the wind resource off the Humboldt County coast is the best in California and is comparable with some of the best performing offshore wind sites in Europe. Additionally, the Port of Humboldt Bay is a deep draft port facility with upland infrastructure that could be revitalized and upgraded for staging offshore wind equipment.

Four years ago, RCEA began exploring how to access this offshore wind resource to deliver local clean energy to Humboldt County. As a first step in 2017, RCEA initiated initial outreach and stakeholder engagement within the community that consisted of one-on-one meetings with various stakeholder groups.

RCEA engaged in a systematic and comprehensive process to identify an offshore wind project site that would mitigate impacts to the environment and community. Conversations held with the local and regional fishing community, including the Humboldt Fishermen's Marketing Association (who have entered a memorandum of understanding with RCEA) and the Pacific Coast Federation of Fishermen's Associations, sought to identify the general location of several valued fishing areas to develop a potential project area that minimizes conflicts with existing fishing interests.

In early 2018, RCEA initiated a competitive request for qualification (RFQ) process to select an experienced offshore wind development team to enter a public-private partnership to pursue the development of an offshore wind project off Humboldt County. In April 2018, after evaluating applications from major offshore wind developers from around the world, RCEA's 15-member community stakeholder review panel selected a team of experienced developers that have since formed Redwood Coast Offshore Wind (ROW). ROW is a joint venture of Ocean Winds and Aker Offshore Wind, in partnership with RCEA, to develop a commercial scale wind farm off the Humboldt County coast.

RCEA and ROW believe that direct community involvement and local stakeholder support are essential to the viability and success of an offshore wind project. Since 2018, ROW, in partnership with RCEA, has been conducting frequent, and ongoing engagement with a diverse group of local stakeholders that includes commercial fishing associations, local government, environmental non-profits, Native American Tribes, organized labor, and elected officials. We are taking a community-based approach to developing Humboldt County's offshore wind resource that prioritizes community values, protecting the environment, and developing strategies to avoid or mitigate impacts to the fishing community, while creating jobs and economic development.

[The Offshore Wind Opportunity](#)

California is particularly vulnerable to the effects of climate change and has been increasingly subjected to devastating disasters caused by global warming, including increasing droughts, flooding, and wildfires. All these major challenges must be met with bold solutions that advance climate mitigation, increase our electric system reliability, and provide for long-term economic recovery. This year, President Biden made climate change mitigation a central priority of his administration and declared the intent to achieve a 100% clean electric system by 2035, accompanying this announcement with an executive order directing federal departments and agencies to prioritize offshore wind.

On May 25, the President and Governor Newsom announced a plan to move forward with leasing for an initial 4.6 GW of offshore wind in Morro Bay and Humboldt. With offshore wind, California could become the center of a growing global industry at the intersection of innovation, manufacturing, and clean energy. Most importantly, offshore wind presents a huge potential to create local jobs, advance towards a carbon-free electric system, and address the threat of climate change.

A Locally Driven Solution

Local Humboldt stakeholders have continuously emphasized the need to proactively address climate change while preserving the coastal environment and the economic benefits of commercial and recreational fisheries. RCEA and ROW believe that an initial offshore wind project that aligns with local stakeholder values and that is sized to the regional electric system is the best way to provide clean energy within the regionally constrained transmission system.

Further, developing offshore wind in close consultation with the local community and North Coast Tribes, has a higher likelihood of obtaining state and local permit approvals in a timely manner. Taking such an approach will not only enable us to deliver local, carbon-free, renewable electricity at the earliest possible date, but it will also provide a critical opportunity to assess the role of offshore wind in Humboldt County before moving forward with larger scale development.

In Humboldt County, inadequate Tribal and community engagement has resulted in failure of renewable energy development in the past. Given this history, it is critical that we make a concerted effort to understand and properly analyze the concerns of local stakeholders, especially Native American Tribes whose ancestral territory could be impacted by offshore wind development. This consultation should foster the collaboration necessary for project success.

RCEA and ROW commend BOEM's efforts to prepare the EA and to solicit stakeholder comments. The scope of the EA will address the potential environmental consequences associated with issuing commercial wind leases, and associated site characterization activities. The EA process is an important first step toward responsible development of Humboldt's offshore wind resources in consultation with all stakeholders.

Commercial Fishing

RCEA and ROW believe that responsible offshore wind development must include early, transparent, and continuous collaboration with the fishing industry. The success of offshore wind in Humboldt will depend on its ability to coexist alongside the Humboldt County fishing community, as well as those up and down the coast that fish in the Humboldt Wind Energy Area and regional vicinity. A key element of this coexistence is the minimization of disruptions to fishing activities from site characterization activities.

In 2018 RCEA entered a Memorandum of Understanding with the Humboldt Fishermen's Marketing Association (HFMA) agreeing to work together to effectively identify, avoid, minimize, and mitigate impacts to the commercial fishing industry to the greatest extent possible. Since entering the MOU, RCEA and the project team have continued to engage with HFMA with the intent to enter an agreement that further solidifies the commitments outlined in the 2018 agreement.

In public comments, the fishing community has continually urged BOEM to consider their use of the Humboldt WEA while protecting proprietary information concerning the exact fishing locations of

certain species. HFMA, under a grant from the California Ocean Protection Council, is leading an effort to develop a spatial map of commercial fishing grounds west of three northern California counties.

This critically important work will establish a baseline of current fishing fleet activities in a format that is accessible to the public. Importantly, it will improve our ability to work together with the local fishing community to responsibly develop Humboldt County's offshore wind resource in a manner that positively impacts the local community. RCEA and ROW urge BOEM to consider the HFMA-developed spatial map within the EA and to engage HFMA on this project. In addition, we urge BOEM to continue its engagement with the fishing community in the region to develop robust and accurate data on local fishing efforts that is accepted by them as well as regulators.

Port Infrastructure

Access to a local, purpose-built port facility for staging, construction, long-term operations and maintenance is both critical to the success of the offshore wind project and necessary to advancing the responsible development of Humboldt County's offshore wind resources. Humboldt Bay is a deep draft port with under-utilized coastal dependent industrial lands that could be revitalized and upgraded for staging floating offshore wind projects. In addition, Humboldt Bay deep draft shipping channels can accommodate the large marine vessels delivering wind turbine components.

The Humboldt Bay Harbor and Recreation District (HBHD) is advancing critical activities needed to permit and construct a purpose-built port facility capable of supporting floating offshore wind projects. In July, HBHD submitted a grant application to the U.S. Department of Transportation FY 2021 Port Infrastructure Development Program to fund the development of a Humboldt Bay Offshore Wind and Heavy Lift Marine Terminal. With this funding HBHD can advance the responsible re-development of local infrastructure and help to better position Humboldt County to derive local economic and job creation benefits associated with offshore wind. RCEA and ROW urge BOEM to support this important work.

Humboldt Wind Energy Area Future Lease Blocks

RCEA and ROW commend BOEM's designation of the entirety of the Humboldt Call Area into a WEA. As detailed in BOEM's memorandum documenting the analysis and rationale in support of the recommended WEA designation, the Humboldt WEA has the potential to host over 1600 megawatts of offshore wind capacity. RCEA and ROW urge BOEM to identify multiple lease areas within the WEA. Multiple lease areas will provide the optionality needed to tailor the project in a way that suits the local community while also enabling scale to maximize efficient delivery of these innovative projects in the longer term.

Eventually developing the full WEA could maximize the value of Humboldt's offshore wind resource to address the climate crisis and support local economic development. At the same time, there are a range of factors that affect when and how fast this can or should be achieved. As has been well documented, the Humboldt region has a low electric load and a limited transmission capacity to support the development and integration of offshore wind from the full Humboldt WEA or to export it to load centers elsewhere in the state.

The RePower Humboldt Technical Study published in 2013 showed that Humboldt County has hundreds of megawatts of untapped renewable energy potential from a variety of sources, including solar, wind, wave, hydro and biomass. With a population of less than 140,000 and a limited industrial base, electric loads in Humboldt are small. In contrast, California's urban counties have much larger loads and little potential for renewable energy generation other than rooftop solar. For example, in 2018 San Francisco consumed seven times as much electricity as Humboldt County, and Los Angeles County used 85 times as much. Humboldt County is uniquely situated to offer its excess wind energy to urban load centers once transmission capacity is increased.

As noted earlier, RCEA and ROW believe that an initial project that aligns with local stakeholder values and is sized to the regional electric system's current constraints is the best fit to provide local clean energy. This approach will enable us to deliver local, carbon-free, renewable electricity as soon as possible. At the same time local stakeholders will have the opportunity to assess the future role of offshore wind in Humboldt County. RCEA and ROW urge BOEM and California state officials to identify and invest in transmission solutions that will unlock the climate and economic benefits of offshore wind energy.

Conclusion

Again, RCEA and ROW commend BOEM on recent efforts to advance the responsible development of California's offshore wind resources in consultation with all stakeholders. In particular, we appreciate BOEM's efforts to prepare an Environmental Assessment under the National Environmental Policy Act for future commercial wind lease issuance on the Pacific Outer Continental Shelf off the coast of Humboldt County, California. RCEA and ROW look forward to continued engagement with BOEM.

Sincerely,



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