

CALIFORNIA COASTAL COMMISSION

ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY
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W6a

EXECUTIVE DIRECTOR'S REPORT

June 12, 2024

CORRESPONDENCE

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From: [Elley Casey](#)
To: ExecutiveStaff@Coastal
Date: Friday, June 7, 2024 3:08:52 PM

Good afternoon,

I am writing to address the proposed Wind farm project off our coast. I am adamantly against this disastrous proposal that is already harming marine life. Local fisherman have already documented a sharp decline in cod populations.

Equinox does not play by the regulations.

There is not one sane reason to allow the proposed wind farm development that will industrialize of our beautiful county and harm ocean life.

Please STOP this endeavor that will be destructive to the environment and marine life and the Sacred web of life.

Please respond with Wisdom and Reverence for our Creator's creation!

Yours truly,

Ellen Casey
ellencasey777@gmail.com 805-296-6311

From: [Sharon Johnson](#)
To: ExecutiveStaff@Coastal
Subject: Morro Bay Wind & Fisheries Report
Date: Friday, June 7, 2024 4:27:05 PM

To Whom It May Concern:

I am very concerned that the Equinor group has not put in place necessary best practices for doing their site surveys in the Morro Bay area. The potential damage to marine wildlife and environs is being overlooked. I am asking that the CCC makes necessary safeguards before any more survey tracking is done.

Sincerely

Sharon Johnson
California Resident

From: [Gail Dinsmore](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 11:19:00 AM

To the California Coast Commission,

The charter of the CCC is to develop a state wide template for mitigation of offshore wind development. It appears "best practices for site surveys has not been developed by the working group, before site surveys have been allowed to proceed.

Sound travels faster and longer in water.

The Equinor ships, (which is an international gas and oil company) are proceeding with surveys with:

No independent acoustic monitoring

No before, during, after impact control studies of marine life

No enforcement of sound perimeters

No scout boat

Work occurring at night and in low visibility, using some type of alternative method of seeing without confirming their technology or methods

The decibels used for this sonar testing will, without a doubt, affect the marine environment and life forms. The internet has much evidence.

I personally use an ultrasonic animal repeller, that uses high frequency sound. The Equinor's sonic survey, well multiply my repeller thousands of times. The sonic survey will do harm, great harm actually, common sense tells that besides information.

I find it disturbing, Equinor is basically an oil and gas company, who paid 130 million dollars, for the rights to try (!) and build a wind farm. They have been outside of state waters, but are now attempting to get a permit to come inside state waters, which would be closer to more marine habitat. Why do they need to come closer?

I have lived on the coast for 49 years, seen the tide pool creature makeup, change significantly, am also watching shoreline disappearing at the local beaches, and the kelp....the otters have one small patch in front of Jade Cove.

The wind farms, unfortunately, will do far more harm than good.

Gail Dinsmore

Sent from my iPad

From: [Gail Dinsmore](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 4:02:19 PM

This was written by Jacques-Yvette Cousteau, in 1974,

With life departed, the ocean would become, in effect, an enormous cesspool. Billions of decaying bodies, large and small, would create such an unsupportable stench that man would be forced to leave all coastal regions. But far worse would follow. The ocean acts as the earth's buffer. It maintains a fine balance between the many salts and gases which make life possible. But dead seas would have no buffering effect. The carbon dioxide content of the atmosphere would start on a steady and remorseless climb and when it reached a certain level, a "greenhouse effect" would be created. The heat that normally radiates outward from earth to space, would be blocked by CO₂, and sea level temperatures would dramatically increase.

One catastrophic of this heat would be melting of the icecaps at both North and South poles. As a result, the oceans would rise by 100 feet or more, enough to flood almost all the world's major cities. The rising waters would drive one third of the earth's billions inland, creating famine, fighting, chaos, and disease on a scale almost impossible to imagine.

Meanwhile, the surface of the ocean would have scummed over with a thick film of decayed matter, and would no longer be able to give water freely to the skies through evaporation. Rain would become a rarity, creating global drought and even more famine.

But the final act is yet to come. The wretched remnant of the human race would now be packed cheek by jowl on the remaining highlands, bewildered, starving, struggling to survive from hour to hour. Then would be visited upon them the final plague, anoxia (lack of oxygen). This would be caused by the extinction of plankton algae and the reduction of land vegetation, the two sources that supply the oxygen you are now breathing.

And so man would finally die, slowly gasping out his life on some barren hill. He would have survived the ocean by perhaps thirty years. And his heirs would be bacteria and a few scavenger insects.

Sent from my iPad

From: [Sal Ruiz](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 2:05:04 PM

Dear guardians of the coast, and lands,

Please be sure that the protocol calling for the "Best Practices for site surveys" is fully developed and submitted by the working group prior to granting any kind of Coastal Development or testing.
Let's be sure to get this done correctly and transparently.

Thank you,
Salvador Ruiz

--

Sal Ruiz : (R) Lic # 00865841
(805) 235-7825
Sal@BHGREHaven.com

" We created the world we live in. We can create another better one. All we need to do is see it and believe in creating it, then do it "



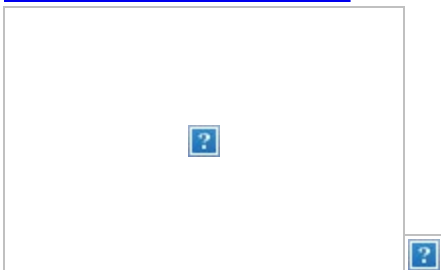
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Paso Robles: 1401 Park St. suite C. Paso Robles Ca. 93446

"Be Courageous, Do Good"

Web: www.salruizrealtor.com

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Presidents Club Member, Golden Circle Member, Emerald Award Recipient,
Platinum Award Recipient.

From: [Bonnie Brady](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 1:37:30 PM
Attachments: [preview.png](#)

To whom it may concern:

Please delay the approval for in state water site surveys for any and all offshore wind developers, until the Working group for condition 7 has completed a formal policy template for the mitigation of offshore wind survey work, specifically any and all offshore wind geophysical and geotechnical site survey development.

As we have seen on the East Coast, there has been no programmatic EIS format for site surveying and as such we have had multiple surveys with over a dozen boats in every area of Southern New England and the Mid-Atlantic, leaving no area untouched so that marine mammals and fish stocks are being chased away from their feeding and breeding grounds.

Black cod fishermen have documented extreme financial losses and that information should be included in the working groups mitigation and compensation for survey work formal policy as is done in the UK. Nothing has been done for East Coast fishermen to date Re survey work fishing losses. You have a chance to elevate your work through the inclusion of a formal policy to protect your fishermen.

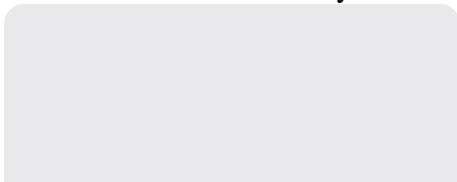
Additionally on the east coast, which has been bombarded with OSW site surveys since 2015, with a huge increase in surveys beginning in 2023, marine mammals have been stranding at far higher rates. 85 large whales (all low frequency hearing) dead in 13 months (Dec 1, 2022 to Dec 31 2023) from Maine to Florida, an unheard of number, with zero entanglements. Over 24 large whales have stranded since January 1, 2024.

Without a Best Practices document that California through federal consistency review can enforce as part of its CZMP, you may be fated to the same scenario as the East Coast is living through.

NOAAs IHAs rely on documents from Southall and Finneran that have been recently questioned by Canadian scientists regarding the amount of animals that suffer IHA Level B temporary deafness <https://cdnsiencepub.com/doi/pdf/10.1139/cjz-2022-0085>

and Finneran admitted in 2023 that the bottlenose dolphin has hearing loss at a far lower frequency than had previously been noted, but as yet had not been corrected in NOAA's guidance for IHA approval. <https://pubs.aip.org/asa/jasa/article/154/2/1324/2908530/Temporary-threshold-shift-in-bottlenose-dolphins>

“ Currently, the California coastal bottlenose dolphin population is not considered threatened or depleted. Nevertheless, it remains a small, genetically distinct stock that may be vulnerable to human threats and ecosystem changes.”



Northern Range Expansion of California Coastal Bottlenose Dolphins (*Tursiops truncatus*)

William Keener¹, Marc A. Wibber^{1,2}, Tim M. Markowitz^{1,3}, Mark P. Potter¹, Daniela Madini⁴, R. H. DeFran⁵, Megan Rice⁶, Amanda J. DeBich⁷, Aimee R. Lang⁸, Dennis L. Kelly⁹, Alex G. Kesaris¹⁰, Maddalena Beardi¹¹, Kayla Consey¹², David Anderson¹³, Lannie Shuster¹⁴, and David W. Weller¹⁵

¹San Marino Museum Center, 2000 Buckle Road, San Marino, CA 91108, USA

²Email: keener@smc.org

³California Academy of Sciences, Department of Ornithology and Mammalogy, 2580 Museum Drive, Golden Gate Park, San Francisco, CA 94118, USA

⁴University of California, Berkeley, Department of Integrative Biology, 3000 Valley Life Science Building, Berkeley, CA 94720, USA

⁵Whitman, PO Box 311, Moss Landing, CA 95039, USA

⁶San Diego State University, California Behavioral Laboratories, San Diego, CA 92182, USA

⁷Department of Geography, University of California, San Diego, 9500 Gilman Drive, La Jolla, CA 92037, USA

⁸Florida Association for, 800 N. Alhambra Street, Alhambra, CA 91801, USA

⁹San Antonio de Padua National Catholic Shrine, 4000, Orange County College, 1350 Fennell Road, Costa Mesa, CA 92626, USA

¹⁰Marine Environmental Science, 4000, Orange County College, 1350 Fennell Road, Costa Mesa, CA 92626, USA

¹¹California State University Fullerton, Department of Psychology, Fullerton, CA 92631, USA

¹²University Research Laboratory, 1000 W. 4th Avenue, Chicago, IL 60607, USA

¹³Southwest Fisheries Science Center National Marine Fisheries Service, 35000, 9401 La Jolla Village Drive, San Diego, CA 92037, USA

¹⁴Shuster

¹⁵Weller

Abstract
The California coastal stock of bottlenose dolphins (*Tursiops truncatus*) expanded its range north from the Southern California Right, its historical range, into Central California coincident with the 1982–1983 El Niño event. Since the late 1980s, bottlenose dolphins sightings north of Central California have been increasingly reported. To determine the present-day northern range limit for these dolphins, photo-identification efforts, were carried out from 2007 to 2018 in San Francisco Bay and nearby coastal waters during which 84 individuals were identified. The results demonstrate a significant range expansion along the Northern California coast at least as far as Sonoma County (38° 7' N). Comparisons with photo-identification catalogs compiled south of San Francisco from 1981 to 2013 revealed that 92% of the 84 dolphins were making up Monterey Bay ($n = 77$), Santa Barbara ($n = 27$), Santa Monica Bay ($n = 29$), Orange County ($n = 19$), Contra Costa Bay ($n = 2$), San Diego ($n = 11$), and Ensenada, Mexico ($n = 1$). Many of the 84 dolphins (54%) showed long-range movements across the stock's range, between the Southern

California Right and the San Francisco Bay Area. The greatest movement distance recorded was by two individuals from observed in San Diego, California, in the 1980s and subsequently in Puget Sound, Washington (47° N), in 2017, setting a coastal bottlenose dolphin long-distance movement record of at least 2,500 km.

Key Words: coastal stock, San Francisco Bay, California, range expansion, photo-identification, bottlenose dolphins, *Tursiops truncatus*

Introduction

Marine predator distribution is often driven by environmental parameters and shifting prey availability (Wirth et al. 2011). Bottlenose dolphins (*Tursiops truncatus*) are apex predators that exhibit flexibility in terms of diet and habitat use (Wells et al. 1989). Longitudinal studies of this species, which live 50 to 60 yr (Wells & Scott 2010), have provided valuable information regarding their social lives, population structure, habitat use, distribution, and movements (Wells 1991). In this article, we report on the continued northern range expansion of California coastal

Keener_et al_2023

PDF Document · 2.2 MB

Considering the vulnerability of California’s bottlenose dolphins it is vitally important to take the additional time to protect them and other endangered and threatened marine mammals on the west coast PRIOR to issuing any approval in state waters.

Please deny any geophysical or geotechnical site surveys in state waters until the working group completes the issue they were tasked with.

Sincerely,
Bonnie Brady
Long Island Commercial Fishing Association

From: [Paul Gallo](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 12:04:20 PM

Dear Executive Committee Staff Members:

I am concerned that the Commission is acquiescing to the ill informed decisions of state, federal, and local governmental agencies regarding the development of wind energy off the California coast. Moreover, the behavior of the wind companies who have acquired leases from BOEM to date would suggest they view California State agencies, including the Coastal Commission, to be powerless entities and mere obstacles to navigate as they press forward to develop offshore wind off our coast. Most recently, the Commission's reliance on BOEM's inadequate Environmental Assessment has allowed Equinor ASA to fast track its surveying off our coast avoiding reasonable and necessary oversight.

You have an opportunity and duty to act on behalf of the Central Coast as soon as next week. It is imperative that Equinor ASA not be permitted to conduct high resolution geographic mapping in state waters until they can demonstrate that best practices for site surveys have been developed in accordance with the Morro Bay Wind and Fisheries Working Group. The California Coastal Commission must not abdicate its responsibility to protect our coast.

Respectfully,
Paul Gallo
Los Osos, CA

From: [Lucy Pierson](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6d - 2025 Meeting Schedule
Date: Friday, June 7, 2024 12:01:28 PM

Dear Executive Staff @ Coastal Ca. Gov.,

Please do not allow Equinox to continue surveying before a “Best Practices” has been established . We must have consideration for the local fisheries , and sea life in general .

Sincerely , Lucy Hunt-Pierson

From: [Elizabeth Quinn](#)
To: ExecutiveStaff@Coastal
Cc: [Elizabeth Quinn](#)
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 11:20:09 AM

I am a resident of the CA Central Coast, am active in environmental protection causes, am intimately involved in the welfare and enjoyment of the natural world around me, and I vote.

I am deeply concerned about the potential negative impacts of offshore wind energy projects on marine wildlife. There is evidence that surveying the ocean floor using sonar is associated with significant (60 - 70%) reduction in fish harvests <https://calcoastnews.com/2024/05/slo-county-fishing-industry-in-peril-judge-to-consider-injunction/>

I am concerned that the “best practices for site surveys” was not developed by the working group *before* site surveys have been allowed to proceed.

Equinor began doing surveys without independent acoustic monitoring, without before-during-&-after impact control studies of marine life, and with no clear communication plan for fishermen.

Equinor began surveys with no mitigation plan for impacts to wildlife and to stakeholders, with no enforcement of the sound perimeters, no scout boat.

There has been use of a foreign vessel, with possible ((probable?)) violations to the Jones Act (e.g.—Americans on board? taking soil samples?)

Their work has been being done at *night* and in *low visibility* using some type of “*alternative method*” of seeing with *no confirmation of their technology or methods*.

My concerns include that the sound decibel levels associated with not only the *surveys* but also offshore wind energy *installations* are severe & excessive, cause unconscionable harms to marine life, resulting, for example, in whale and dolphin deaths because the loud sounds rupture their eardrums, destroying their hearing and their ability to communicate with each other or locate their young.

Respectfully submitted,
Elizabeth Quinn, M.S., D.C.
700 Western Drive
Santa Cruz, CA 95060

From: [becky hochman](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 9:48:55 AM

Do not allow foreign countries to come to our coast and set up turbines which will drastically affect the fishermen and most importantly the sea life from birds to whales otters etc

Do not ruin our coastline .

Go back to your own country and take the turbines with you

We don't want them here!

Leave our coastline alone !!!

Thank you
Becky Hochman

Sent from my iPhone

From: senderosea@aol.com
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 9:07:46 AM

I am deeply concerned about the site surveys in State Water prior to the development and adaptation of the working group's "Best Practices".
Our delicate Marine Life environment and the Sea life that will be affected is of utmost concern to me. The sound perimeters do lethal harm to Marine life. Do not proceed with this survey,

Carol Sanden
Pismo Beach resident

From: [Tom Bolton](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 9:35:15 AM

There is wide non-partisan consensus in San Luis Obispo County and beyond that proponents of this project are running roughshod over the people's desire for greater transparency of the negative environmental impacts this project will have on the Morro Bay ecosystem, bird migration, the local fishing industry, and the overall character of Morro Bay. The Project proponents appear in their actions to have an attitude of "full steam ahead" - torpedoes and the local citizen's voice be damned.

Tom Bolton - SLO County resident since 1963.

From: [David Hurwitz](#)
To: ExecutiveStaff@Coastal
Cc: [Nicole Dorfman](#)
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 9:19:36 AM

I write as a resident of coastal California who is deeply concerned that the CCC might allow harmful site surveying in coastal waters.

I understand that this site surveying might be approved prior to an approved set of Best Practices for Site Surveys. That should not happen.

The site surveying, as currently foreseen, will be very harmful to our precious near-shore ecosystems.

Therefore, the CCC must insist that the Morro Bay Wind and Fisheries Working Group finish its work on Best Practices, have those Best Practices vetted by affected parties, and only then allow surveying to begin.

David Hurwitz
Carmel Valley

650-743-9788

From: [Rone Prinz](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Thursday, June 6, 2024 6:42:59 PM

I am extremely concerned that Equinor is allowed to proceed site surveys without having the proper permits. I urge you to Not issue any permits and to place a moratorium on surveying until the Working Groups Best Practices are developed and approved. I am also concerned about their lack of monitoring, lack of baseline studies and harm to the fishing industry as well as to our marine life & eco system. Please don't be steamrolled by an industry that is masquerading at being "green"!

Concerned Citizen of Morro Bay
Ronē Prinz

Sent from my iPhone

From: [John Bradford](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Thursday, June 6, 2024 6:42:54 PM

Why would you allow site surveys to proceed before “best practices” has been developed by the working group?

Why would you allow Equinor to just do whatever they want with no oversight?

Please use current facts to educate yourselves about the realities of these projects so you can respect your responsibilities rather than be steamrolled by an industry that masquerades as being green.

Sincerely,

Brad Grew

Morro Bay, California

From: [Beverly Ramos](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Thursday, June 6, 2024 5:57:24 PM

Please do not allow “wind energy” in our ocean. Protect our sea life and our beautiful coast.
Thank you
Beverly Ramos
Paso Robles CA

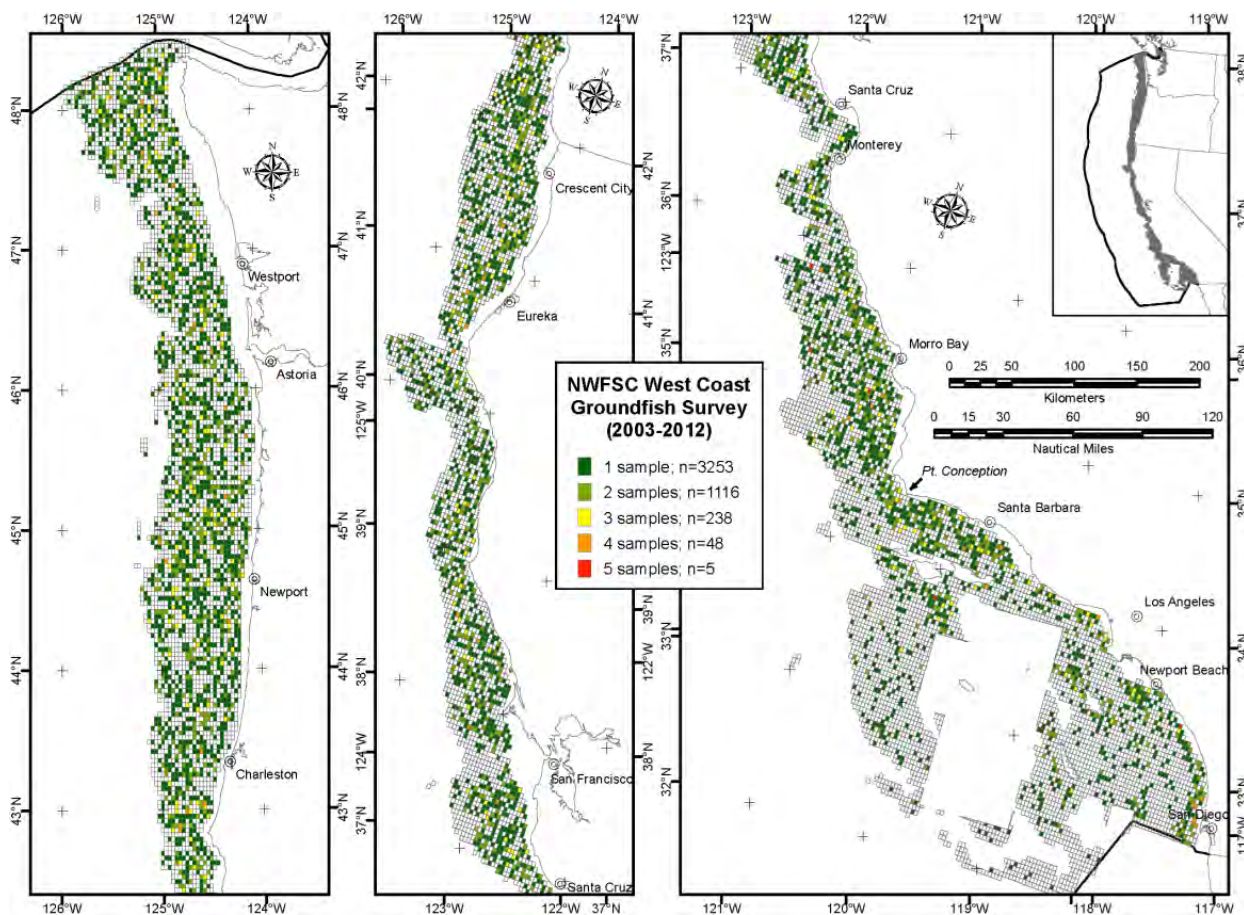
From: [mbcfo member](#)
 To: [ExecutiveStaff@Coastal](#)
 Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
 Date: Thursday, June 6, 2024 5:30:36 PM
 Attachments: [NWFS West Coast GF Surveys.png](#)
[RandAcoustics-SonarVesselNoiseSurvey.pdf](#)

Dear California Coastal Commission,

The 7c working group has in its charter to develop "best practices for site surveys". Also, SB 286 asks for "best practices for site surveys" to be developed. It seems logical that the protocols and policies or "best practices" for site surveys would be required to be developed BEFORE they begin. We think it is a dereliction of duty to have allowed Equinor to commence with site surveys before the 7c working group decided on "best practices". Especially after all the issues the East Coast has had with site surveys correlating with a mass die off of hundreds of whales and cetaceans, devastated scallop grounds and other fisheries, and outrage by the coastal communities. We ask that all further site survey work be halted until the working group is finished with a monitoring and mitigation plan for site surveys.

The BOEM EA is inadequate and inaccurate. Its conclusion of no impacts from site surveys is ludicrous. It relies on old irrelevant studies. Per Author Popper, **there has never been a legitimate study of the impacts of high resolution geographic surveys on the Pacific ocean's marine life.** This would have been California's opportunity to show they care about the ocean by requiring some kind of before after control impact (BACI) monitoring study in place before site surveys started. It's not too late, we can still do this.

An easy BACI would be to use the already established baseline data from NOAA's West Coast Ground fish Bottom Trawl Survey used for stock assessments. Here is a map showing some of the surveys they have done over the last 20 years. You can see there has been several in the WEAs.



There is also baseline data available from collaborative nearshore hook and line and trap studies that could be used and replicated for a BACI. The OPC stated a few days ago they have over \$95 million in grant funds that could possibly be used for these types of studies.

There should also be **independent acoustic monitoring**. The independent acoustic monitoring in the Rand Acoustic sonar vessel survey report demonstrated the problem with lack of monitoring of survey vessel anthropogenic noise. It leads to noise levels be used that are over the permitted levels. He found calculations of safety zones were inaccurate because of underreported noise levels.

Equinor seems to have bullied their way into starting site surveys. We were shocked the State was ok with them starting without any monitoring or mitigation plan in place. But now that they have been given the green light, they seem to do things anyway they want to, with no repercussions. We have had **several questions unanswered** leading us to believe what we suspect is true. Here is a list of our unanswered questions:

1. How are they able to work thru the night and in low visibility? What equipment are they using and how does it work? We have not seen them stop for anything since they began April 19.
2. Why are they not using a scout boat in the wind energy area and especially along the cable routes where whales and turtles are migrating and fishermen have fishing gear?
3. They are using a foreign flagged vessel. It must follow the Jones Act. Do they have the required amount of Americans on board? Are they taking prohibited soil samples?
4. They are installing Underwater Transponders Positioning devices (UTPs). Done without notice. How does this impact fishing? Can we lay traps and long lines over the top of them? Are they using them in the cable routes?

Please consider all these issues when reviewing Equinor's Coastal Development Permit.

Sincerely,

Tom Hafer, President MBCFO
 (805) 610-2072
mbcfo1972@gmail.com

From: [Protect](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 3:17:10 PM
Attachments: [Morro Bay Sonic Mapping - Final.pdf](#)

Please find my comments on Agenda Item 6a for Wednesday 6/12/24 regarding Equinor's High Resolution Geographic mapping and their Coastal Development Permit (CDP) to come into State Waters (inside 3 miles). Please do not approve this permit application.

Sent with [Proton Mail](#) secure email.

From: hopescottross@gmail.com
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 2:54:38 PM

Dear Coastal Commissioners,

The Coastal Act mandates the California Coastal Commission to “protect, conserve, restore, and enhance” the state's coastal resources. Governor Newsom signed Senate Bill (SB) 286 into law on October 7, 2023. I am writing to urge the commission to enforce this law.

SEC. 4. Section 30616 reads: (b) On or before January 1, 2025... (c) The statewide strategy developed pursuant to this section shall include best practices for addressing impacts to the commercial and recreational fishing industries, tribal fisheries, and environmental resources associated with offshore wind energy projects, including, but not limited to, the following:

- (1) Protocols for communication among impacted parties.
- (2) A methodology for a comprehensive project-level socioeconomic analysis of direct and indirect impacts to commercial and recreational fishing industries and tribal fisheries.
- (3) Best practices for offshore surveys and data collection to assess impacts.
- (4) Best practices for avoidance and minimization of impacts, including the use of evidence-informed adaptive management.
- (5) A template for a fishing agreement that includes all relevant elements of the statewide strategy.
- (6) A template for an agreement addressing tribal fishing interests that includes all relevant elements of the statewide strategy.
- (7) (A) A framework for reasonable compensatory mitigation for unavoidable impacts to the commercial and recreational fishing industries and tribal fisheries.
- (3) (A) An applicant seeking approval or concurrence from a state agency for an offshore wind energy project shall comply with the terms, recommendations, and best practices established in the statewide strategy, as adopted by the commission.
- (B) The commission shall ensure that the terms, recommendations, and best practices established in the statewide strategy, as adopted by the commission, are implemented.

The bill requires the statewide strategy to include best practices for addressing impacts to the commercial and recreational fishing industries, tribal fisheries, and environmental resources associated with offshore wind energy projects, as specified, and to be completed on or before January 1, 2026.

The "best practices for site surveys" have not been developed by the working group, yet site surveys have been allowed to proceed. Consequently, Equinor has started conducting surveys with several concerning issues:

No independent acoustic monitoring
No before-during-after impact control studies of marine life
No clear communication plan for fishermen
No mitigation plan for impacts on wildlife and stakeholders
No enforcement of sound perimeters

No scout boat

Use of a foreign vessel, potentially violating the Jones Act (with questions about Americans on board and soil sample collection)

Work occurring at night and in low visibility using unconfirmed alternative methods

The CCC is relying on BOEM's incomplete and inaccurate environmental assessment, which incorrectly states there will be no impacts from site surveys on marine wildlife or fishermen. This conclusion is based on outdated and irrelevant studies and assumptions. There has never been a study on the impacts of High-Resolution Geographic mapping in the Pacific Ocean.

One of the Coastal Commission's stated Key Statutory Responsibilities is to "ensure that coastal resources are effectively protected." Please show you care, by halting Equinor's practices until these issues have been rectified.

Respectfully,

Hope Ellis Mayer
Morro Bay, CA

From: [Nicole Dorfman](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 3:39:18 PM

Dear CA Coastal Commissioners,

I am writing to you as a resident of Morro Bay to request that you **place a moratorium on HRG surveying in State waters by offshore wind energy developers until the Condition 7 Working Group has determined "best practices" for the work.** The working group's charter is to develop a statewide template for mitigation of offshore wind development. At this point in time, no plan has been formally proposed or adopted and therefore, no activity should be permitted.

Please make sure that surveys are not allowed to proceed in state waters until those "best practices" are in place. Why bother to even determine "best practices" if the work is being done prior to their adoption?

Furthermore, I urge you to consider the **cumulative impacts** on surveying activity near the Morro Bay WEA as 3 wind companies will be surveying in the same area and along the same potential cable routes, including in nearshore waters, and Marine Protected Areas.

It is well documented that HRG surveying uses very high decibel levels (up to and possibly over 228dB). The offshore wind companies claim that marine mammals and fish will not be harmed because the sounds are too loud for them to hear. **To me, this is a false argument as loud sounds are actually powerful vibrations that absolutely impact living tissue - hearing is but one way that these vibrations are experienced.** Evidence is widely available to back up this claim. Baseline studies must be done to determine the true safety profile of the HRG technology. **Please require these baseline studies prior to surveying in state waters, and especially in nearshore areas.**

As you know, Equinor/Atlas Wind has already started surveying in federal waters and I have great concern that they are operating without independent acoustic monitoring, without a communication plan for alerting fishermen of their activities, with no baseline studies, and more. Please do not let this happen in California!

Thank you for your serious consideration of these matters and for acting to the best of your ability to protect our marine environment and fragile nearshore ecosystems.

Sincerely,

Nicole Dorfman
Morro Bay

From: [Rebecca Robinson](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Thursday, June 6, 2024 7:26:40 PM

To whom it may concern,

I have serious concerns about starting site surveys in state water prior to the development and adaptation of the working group's "best practices". Cod fishermen have already experienced a 67% decrease in catch. Please stop this nonsense and cancel the wind platform project!

Respectfully,

Rebecca Robinson

Sent from my iPad

From: [Patrice Promack](#)
To: ExecutiveStaff@Coastal
Subject: Agenda item W6a
Date: Thursday, June 6, 2024 10:32:45 PM

To all members of the California Coastal Commission:

There are many reasons for significant concern regarding the current activities of Equinor in conducting their surveys. Of primary concern is the fact that "best practices for site surveys" has not been developed by the Morro Bay Wind Energy Lease Area Condition 7 Working Group before site surveys have been allowed to proceed. As a result, Equinor has begun doing surveys with:

- No independent acoustic monitoring,
- No *before during after impact control studies* of marine life,
- No clear communication plan for the fishermen
- No mitigation plan for impacts to wildlife and to stakeholders
- No enforcement of the sound perimeters
- No scout boat
- Use of a foreign vessel with questionable violations to the Jones Act (Americans on board? taking soil samples?)
- Work occurring at night and in low visibility using some type of "alternative method" of seeing without confirming their technology or methods

The CCC is relying on BOEM's incomplete, inaccurate EA that states there will be no impacts from site surveys on marine wildlife and no impacts to fishermen. This conclusion is based on old irrelevant studies and assumptions - **there has NEVER been a study of impacts from High Resolution Geographic mapping in the Pacific Ocean.** Already black cod fishermen have documented a 67% decline in their catches.

The decibels (228dB) they will be allowed to use definitely have impacts to mammals, fish, invertebrates, larvae, zooplankton, and krill. It is not only the mapping equipment but also the noise from the vessel. In order for them to map, they have to go in very straight lines and turn in tight circles/u turns. The positioning systems and thrusters on these 300' ships put out 126dB at 9.6Hz. constantly, 24 hours a day, for weeks at a time.

The damaging effects from these site surveys should not be allowed in California's state waters prior to the development and adaptation of the working group's "best practices".

Thank you for insuring that the working group be allowed to weigh in on this activity before Equinor proceeds in California waters.

Sincerely,

Patrice Promack

From: [Mike Cole](#)
To: ExecutiveStaff@Coastal
Subject: Concerned about "Best Practices for Site Surveys"
Date: Friday, June 7, 2024 2:10:31 PM

Greetings CCC:

My name is Michael Cole, a resident of Avila Beach.

It has come to my attention that the BOEM Working Group for site surveys has been mandated to develop a "Best Practices for site surveys" template for mitigation of offshore wind development **before** any site surveys can be undertaken.

However, it is my understanding the working group has yet to produce the required template, and yet, **Equinor, the developer, has already begun the acoustic surveys.**

This is extremely concerning to me, as well as many other CA residents who love the aquatic biodiversity of our ocean, and are not quite aware of what's really going on.

We are demanding the CA Coastal Commission protect this unique and fragile ecosystem at all cost.

Below is a list that of our major concerns:

Equinor has begun doing surveys with:

- No independent acoustic monitoring,
- No *before during after impact control studies* of marine life,
- No clear communication plan for the fishermen
- No mitigation plan for impacts to wildlife and to stakeholders
- No enforcement of the sound perimeters
- No scout boat
- Use of a foreign vessel with questionable violations to the Jones Act (Americans on board? taking soil samples?)
- Work occurring at night and in low visibility using some type of "alternative method" of seeing without confirming their technology or methods

I'm aware that your organization is relying on BOEM's EA that states there

will be no impacts from site surveys on marine wildlife and no impacts to fishermen. The EA is incomplete and inaccurate. This conclusion is based on old irrelevant studies and assumptions - **there has NEVER been a study of impacts from High Resolution Geographic mapping in the Pacific Ocean.** [Already, black cod fishermen have documented a 67% decline in their catches.](#)

The decibels (228dB) they will be allowed to use do have impacts on mammals, fish, invertebrates, larvae, zooplankton, and krill.

It is not only the mapping equipment but also the noise from the vessel. In order for them to map, they have to go in very straight lines and turn in tight circles/u turns. The positioning systems and thrusters on these 300' ships put out 126dB at 9.6Hz. constant 24 hours a day for weeks at a time.

I am confident your organization will do the right thing, and halt Equinor's site surveys, until the working group has produced the best practices survey.

Best Regards,

Michael Cole
P.O.Box 2418
Avila Beach, CA 93424
760 803 1863

From: [Marcie Cole](#)
To: ExecutiveStaff@Coastal
Subject: Concerned about "Best Practices for Site Surveys"
Date: Friday, June 7, 2024 3:19:51 PM

Dear CCC:

My name is Marcie Cole and I am a resident of Avila Beach, California. It has come to my attention that the BOEM Working Group for site surveys has been mandated to develop a "Best Practices for site surveys" template for mitigation of offshore wind development **before** any site surveys can be undertaken.

However, it is my understanding the working group has yet to produce the required template, but Equinor, the developer, has already begun the acoustic surveys.

This is extremely concerning to myself and all CA residents who love the aquatic biodiversity of our ocean, and are not quite aware of what's really going on. We are demanding the CA Coastal Commission protect this unique and fragile ecosystem at all cost.

Below is a list that of our major concerns:

Equinor has begun doing surveys with:

- No independent acoustic monitoring,
- No *before during after impact control studies* of marine life,
- No clear communication plan for the fishermen
- No mitigation plan for impacts to wildlife and to stakeholders
- No enforcement of the sound perimeters
- No scout boat
- Use of a foreign vessel with questionable violations to the Jones Act (Americans on board? taking soil samples?)
- Work occurring at night and in low visibility using some type of "alternative method" of seeing without confirming their technology or methods

I'm aware that your organization is relying on BOEM's EA that states there will be no impacts from site surveys on marine wildlife and no impacts to fishermen. The EA is incomplete and inaccurate. This conclusion is based on old irrelevant studies and assumptions - **there has NEVER been a study of impacts from High Resolution Geographic mapping**

in the Pacific Ocean. [Already, black cod fishermen have documented a 67% decline in their catches.](#)

The decibels (228dB) they will be allowed to use do have impacts on mammals, fish, invertebrates, larvae, zooplankton, and krill.

It is not only the mapping equipment but also the noise from the vessel. In order for them to map, they have to go in very straight lines and turn in tight circles/u turns. The positioning systems and thrusters on these 300' ships put out 126dB at 9.6Hz. constant 24 hours a day for weeks at a time.

I am confident your organization will do the right thing, and halt Equinor's site surveys, until the working group has produced the best practices survey.

Best Regards,

Marcie Cole
P.O.Box 2418
Avila Beach, CA 93424
858-333-1884

From: [Katie Franklin](#)
To: ExecutiveStaff@Coastal
Subject: Item 6a Morro Bay Wind and Fisheries
Date: Thursday, June 6, 2024 9:33:09 PM

To whom it may concern;
Regarding **“Best Practices for site surveys”**.
I have great concern that the **“best practices for site surveys” has not been developed by the working group before site surveys have been allowed to proceed**. As a result, Equinor has begun doing surveys with:

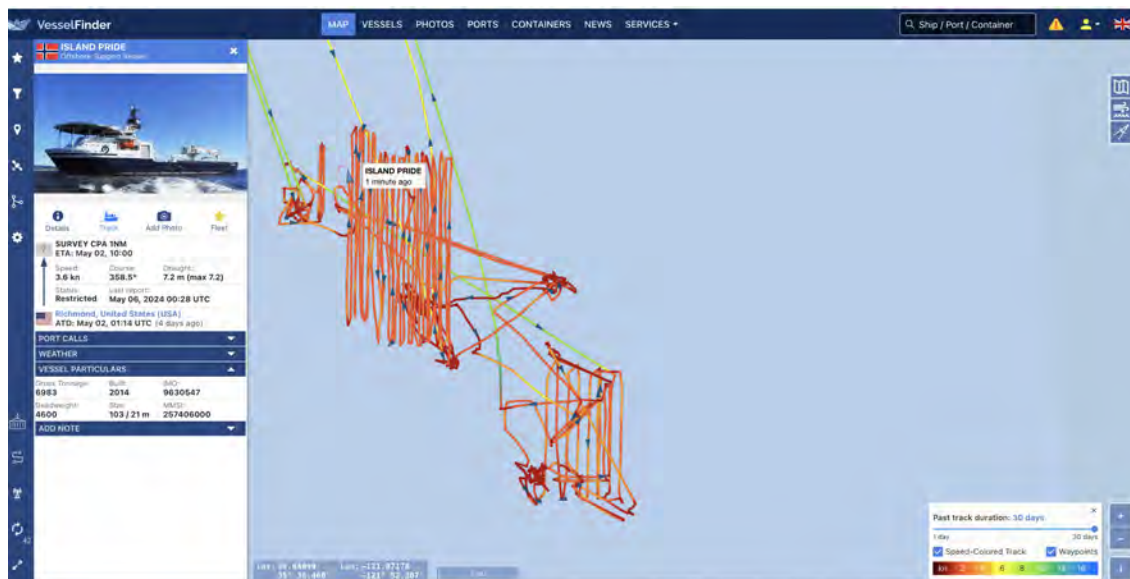
- No independent acoustic monitoring,
- No *before during after impact control studies* of marine life,
- No clear communication plan for the fishermen
- No mitigation plan for impacts to wildlife and to stakeholders
- No enforcement of the sound perimeters
- No scout boat
- Use of a foreign vessel with questionable violations to the Jones Act (Americans on board? taking soil samples?)
- Work occurring at night and in low visibility using some type of “alternative method” of seeing without confirming their technology or methods

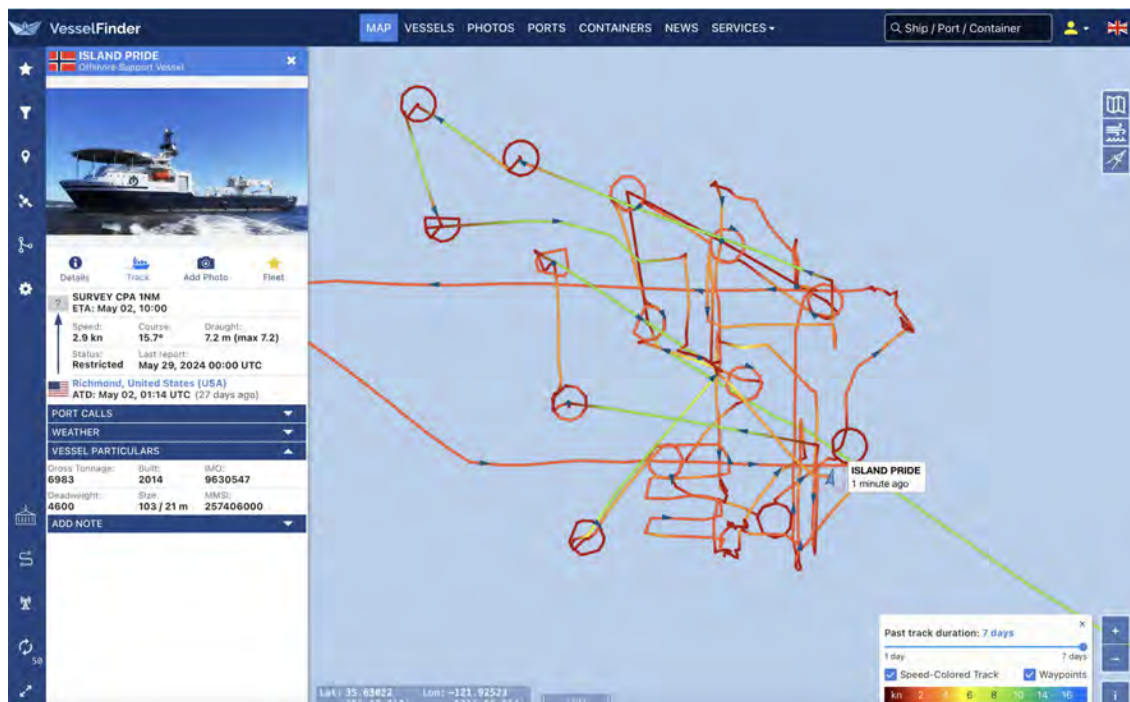
BOEM’s incomplete, inaccurate EA that states there will be no impacts from site surveys on marine wildlife and no impacts to fishermen. Is based on old irrelevant studies and assumptions - **there has NEVER been a study of impacts from High Resolution Geographic mapping in the Pacific Ocean.** [Already, black cod fishermen have documented a 67% decline in their catches.](#)

The decibels (228dB) they will be allowed to use do have impacts to mammals, fish, invertebrates, larvae, zooplankton, and krill.

It is not only the mapping equipment but also the noise from the vessel. In order for them to map, they have to go in very straight lines and turn in tight circles/u turns. The positioning systems and thrusters on these 300' ships put out 126dB at 9.6Hz. constant 24 hours a day for weeks at a time.

This is what the mapping looks like from real-time tracking of Equinor's Island Pride in our waters right now and in the recent few weeks





Equinor has been working in Federal Waters (outside 3 miles) but is currently attempting to get a Coastal Development Permit (CDP) to come into State Waters (inside 3 miles). Please stop allowing these premature and destructive practices. This is against the law and best practices. Please enforce the protection of our oceans and all wildlife.

Thank you

Katie Franklin

1613 7th St

Resident since 1975

From: [Carolyn Krueger](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Friday, June 7, 2024 12:53:50 PM

Dear Commissioners:

It has come to my attention that the Morro Bay Wind and Fisheries Working Group's charter is to develop a statewide template for mitigation of offshore wind development. This includes "Best Practices for Site Surveys."

Unfortunately, "Best Practices for Site Surveys" was not developed by the working group **prior** to the commencement of site surveys by Equinor. As a result, Equinor has begun doing surveys with:

- No independent acoustic monitoring,
- No *before during after impact control studies* of marine life,
- No clear communication plan for the fishermen
- No mitigation plan for impacts to wildlife and to stakeholders
- No enforcement of the sound perimeters
- No scout boat
- Use of a foreign vessel with questionable violations to the Jones Act (Americans on board? taking soil samples?)
- Work occurring at night and in low visibility using some type of "alternative method" of seeing without confirming their technology or methods

Further, I am aware that the CCC is relying on BOEM's incomplete, inaccurate EA that states there will be no impacts from site surveys on marine wildlife and no impacts to fishermen. This conclusion is based on old irrelevant studies and assumptions - **there has NEVER been a study of impacts from High Resolution Geographic mapping in the Pacific Ocean.** [Already, black cod fishermen have documented a 67% decline in their catches.](#)

The decibels (228dB) they will be allowed to use do have impacts to mammals, fish, invertebrates, larvae, zooplankton, and krill.

It is not only the mapping equipment but also the noise from the vessel that is harmful to marine wildlife. In order for them to map, they have to go in very straight lines and turn in tight circles/u turns. The positioning systems and thrusters on these 300' ships put out 126dB at 9.6Hz. constant 24 hours a day for weeks at a time!

Equinor has been working in Federal Waters (outside 3 miles) but is currently attempting to get a Coastal Development Permit (CDP) to come into State Waters (inside 3 miles). I understand that the CCC executive staff is reviewing this now. I am very much opposed to the CCC green-lighting another round of site surveys absent the establishment of Best Practices by the Morro Bay Wind and Fisheries Working Group, particularly in light of the reliance of the CCC on BOEM's inaccurate and incomplete EA stating there will be no negative impacts to marine wildlife and fishermen.

Finally, in light of the fact that BOEM has stated that **“Overall, it is anticipated that there would be no collective impact on global warming as a result of offshore wind projects . . . ”** I fail to comprehend the need for fast-tracking permitting processes. There is no emergency with regard to building offshore wind turbines that justifies potentially endangering Morro Bay's marine wildlife, particularly our threatened (on the federal Endangered Species List) Southern Sea Otters, who are extremely sensitive to noise and disturbance.

Please consider your responsibilities carefully. We are all tasked with stewardship of our marine habitat and its residents.

Very truly yours,

Carolyn Krueger
Morro Bay Resident

From: tstrickin@aol.com
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Thursday, June 6, 2024 9:56:02 PM

To Whom It May Concern:

“Best practices” for site surveys has not been developed by the working group before site surveys have been allowed to proceed. As a result, Equinor has begun doing surveys with:

- No independent acoustic monitoring,
- No *before during after impact control studies* of marine life,
- No clear communication plan for the fishermen
- No mitigation plan for impacts to wildlife and to stakeholders
- No enforcement of the sound perimeters
- No scout boat
- Use of a foreign vessel with questionable violations to the Jones Act (Americans on board? taking soil samples?)
- Work occurring at night and in low visibility using some type of “alternative method” of seeing without confirming their technology or methods

You are relying on BOEM’s incomplete, inaccurate EA that states there will be no impacts from site surveys on marine wildlife and no impacts to fishermen. This conclusion is based on old irrelevant studies and assumptions - **there has NEVER been a study of impacts from High Resolution Geographic mapping in the Pacific Ocean.** [Already, black cod fishermen have documented a 67% decline in their catches.](#)

The decibels (228dB) they will be allowed to use do have impacts to mammals, fish, invertebrates, larvae, zooplankton, and krill.

It is not only the mapping equipment but also the noise from the vessel. In order for them to map, they have to go in very straight lines and turn in tight circles/u turns. The positioning systems and thrusters on these 300’ ships put out 126dB at 9.6Hz. constant 24 hours a day for weeks at a time.

Equinor has been working in Federal Waters (outside 3 miles) but is currently attempting to get a Coastal Development Permit (CDP) to come into State Waters (inside 3 miles).

My concern is about starting site surveys in state water prior to the development and adaptation of the working group's "best practices".

Sincerely,

Terri Stricklin

44 year resident of San Luis Obispo County

From: [Catherine A Montgomery](#)
To: ExecutiveStaff@Coastal
Subject: CCC Report Item 6a 6/12/2024 Morro Bay Wind and Fisheries Working Group
Date: Thursday, June 6, 2024 6:47:57 PM

I am writing to voice my concerns regarding Item 6A on the **Morro Bay Wind and Fisheries** working group progress, BOEM's Morro Bay Wind Energy Lease Area **Condition 7 Working Group**.

It is my understanding that CCC **required** in their Consistency Determination to permit wind developers to do offshore wind development. The working group is made up of fishermen, seafood processors, fishermen organization representatives, state agencies (SLC, CCC, DFW, others), and wind developers with CA leases. The working group charter is to develop a statewide template for mitigation of offshore wind development, including "Best practices for site surveys".

I have extreme concerns that "the best practices for site surveys" HAS NOT been developed by the working group BEFORE site surveys has been allowed to proceed. The result is Equinor has begun doing surveys with:

- No independent acoustic monitoring,
- No *before during after impact control studies* of marine life,
- No clear communication plan for the fishermen
- No mitigation plan for impacts to wildlife and to stakeholders
- No enforcement of the sound perimeters
- No scout boat
- Use of a foreign vessel with questionable violations to the Jones Act (Americans on board? Are they taking soil samples?)
- Work occurring at night and in low visibility using some type of "alternative method" of seeing without confirming their technology or methods

CCC is relying on BOEM's incomplete, inaccurate EA that states there will be no impacts from site surveys on marine wildlife and no impacts to fishermen. This conclusion is based on old irrelevant studies and assumptions - there has NEVER been a study of impacts from High Resolution Geographic mapping in the Pacific Ocean. Already, [black cod fishermen have documented a 67% decline in their catches.](#)

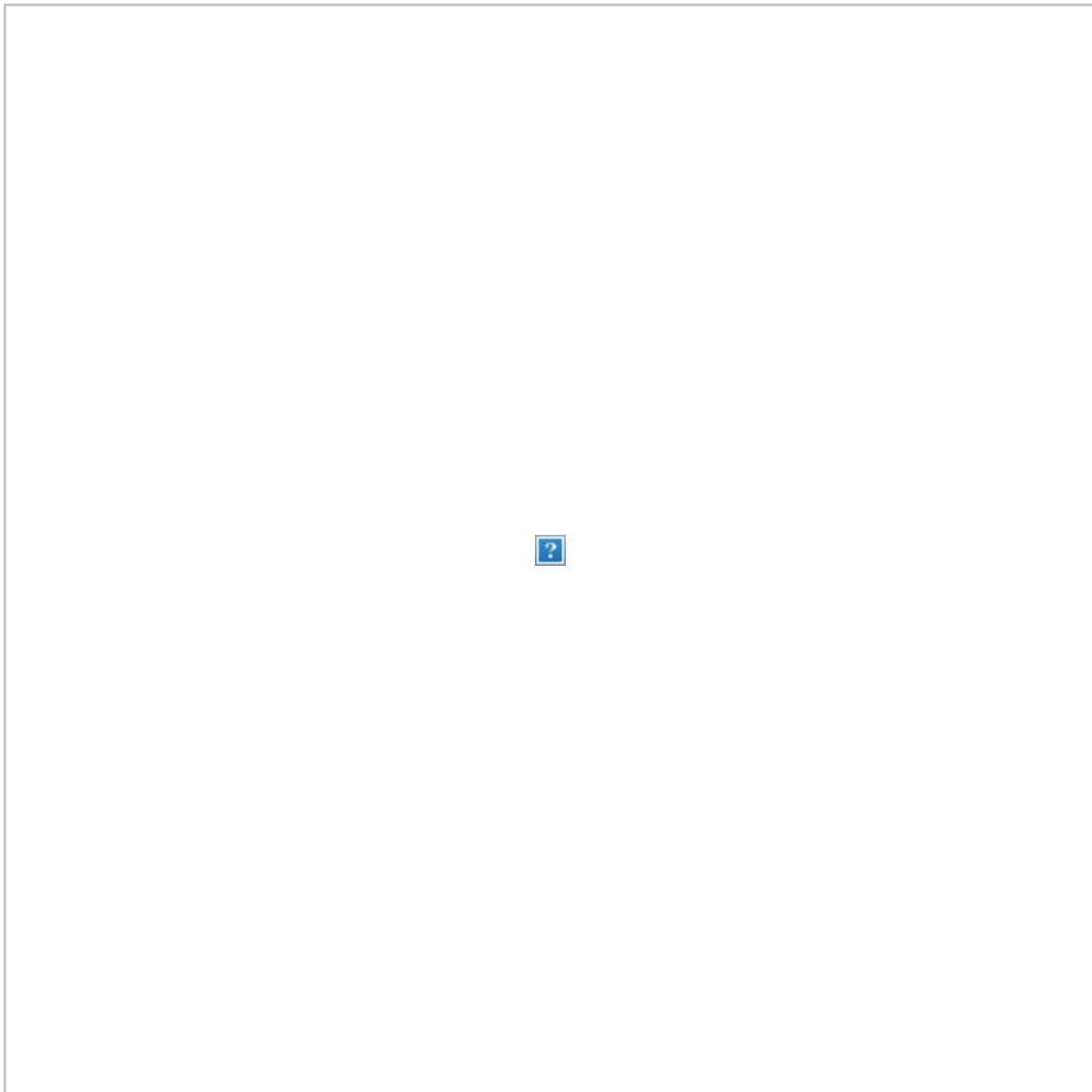
The decibels (228dB) they will be allowed to use do have impacts to mammals,

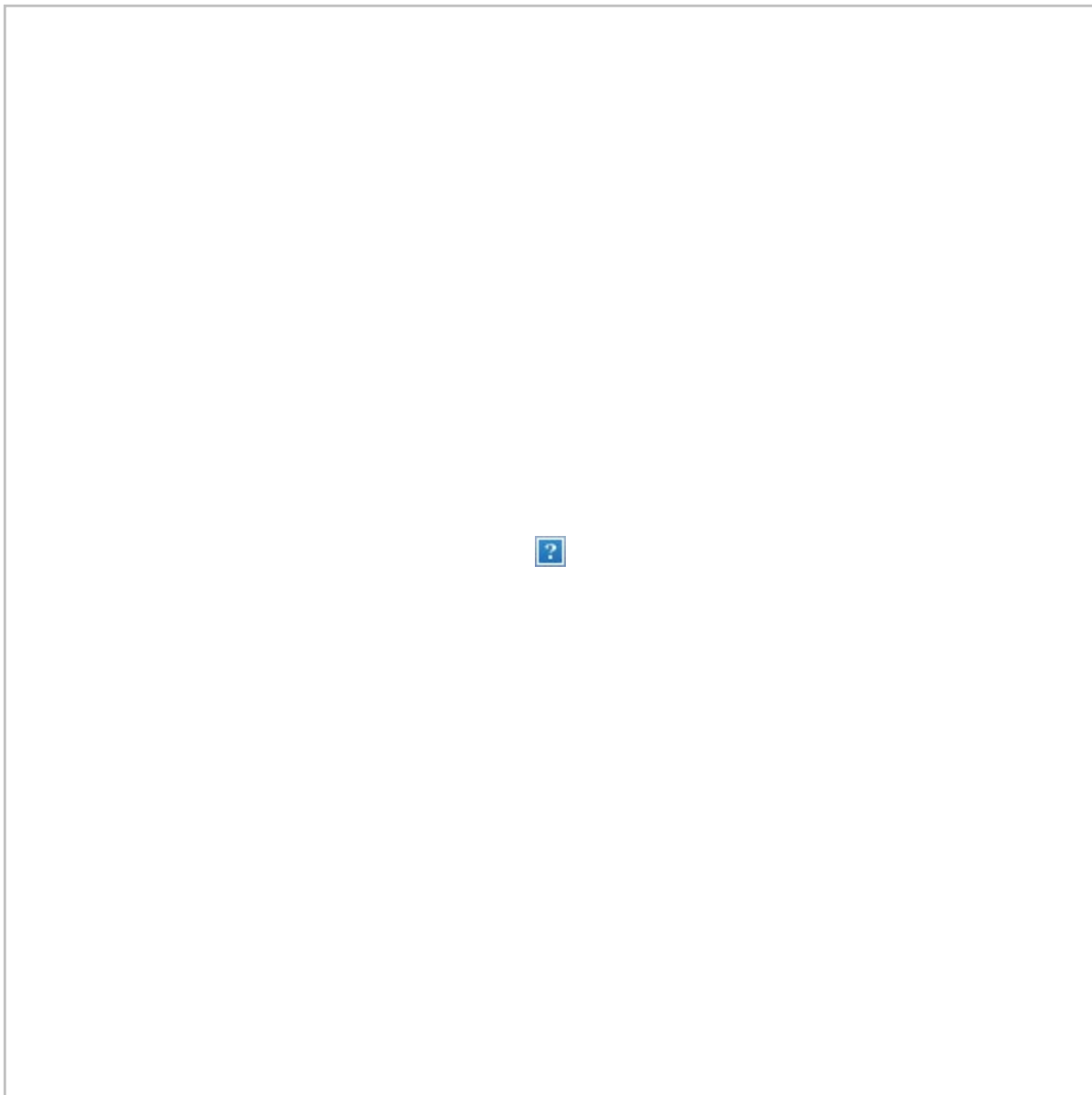
fish, invertebrates, larvae, zooplankton, and krill.

It is not only the mapping equipment but also the noise from the vessel. In order for them to map, they have to go in very straight lines and turn in tight circles/u turns.

The positioning systems and thrusters on these 300' ships put out 126dB at 9.6Hz. constant 24 hours a day for weeks at a time.

This is what the mapping looks like from real-time tracking of Equinor's Island Pride in our waters right now and in the recent few weeks.





Equinor has been working in Federal Waters (outside 3 miles) but is currently attempting to get a Coastal Development Permit (CDP) to come into State Waters (inside 3 miles).

These surveys in state water PRIOR to the development and adaptation of the group's "best practices" should be stopped. Equinor is operating outside of the guidelines, as well as potentially violating protected estuaries and sacred land, disregarding the damage to marine life and otherwise disrupting the enjoyment of the beautiful area it intends to disrupt.

These large companies do not have the right to disregard protocols in place,

and should be stopped.

Your attention to this matter is most appreciated.

Sincerely

Catherine Montgomery

Get [Outlook for Android](#)

From: [calrep](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Thursday, June 6, 2024 7:02:14 PM

I just learned that the **California Coasta Commission** (CCC) executive staff will give a report on Wednesday June 12 under item 6a on the **Morro Bay Wind and Fisheries** working group progress. This is BOEM's Morro Bay Wind Energy Lease Area **Condition 7 Working Group** that the CCC required in their Consistency Determination to permit wind developers to do offshore wind development. The working group is made up of fishermen, seafood processors, fishermen organization representatives, state agencies (SLC, CCC, DFW, others), and wind developers with CA leases. **The working group's charter is to develop a statewide template for mitigation of offshore wind development. This includes "Best Practices for site surveys".**

I am concerned **that the "best practices for site surveys" has not been developed by the working group before site surveys have been allowed to proceed.** As a result, I believe that Equinor has begun doing surveys with:

- No independent acoustic monitoring,
- No *before during after impact control studies* of marine life,
- No clear communication plan for the fishermen
- No mitigation plan for impacts to wildlife and to stakeholders
- No enforcement of the sound perimeters
- No scout boat
- Use of a foreign vessel with questionable violations to the Jones Act (Americans on board? taking soil samples?)
- Work occurring at night and in low visibility using some type of "alternative method" of seeing without confirming their technology or methods

It is my opinion that the CCC is relying on BOEM's incomplete, inaccurate EA that states there will be no impacts from site surveys on marine wildlife and no impacts to fishermen. This conclusion seems to be based on old irrelevant studies and assumptions - **there has NEVER been a study of impacts from High Resolution Geographic mapping in the Pacific Ocean.** [Already, black cod fishermen have documented a 67% decline in their catches.](#)

The decibels (228dB) they will be allowed to use do have impacts to mammals, fish, invertebrates, larvae, zooplankton, and krill.

It is not only the mapping equipment but also the noise from the vessel. In order for them to map, they have to go in very straight lines and turn in tight circles/u turns.

The positioning systems and thrusters on these 300' ships put out 126dB at 9.6Hz. constant 24 hours a day for weeks at a time. Many of us are concerned about the effect that this project will have on our ocean and its inhabitants. Please consider ALL facts in your decisions.

John F. Pack
2813 Rodman Drive
Los Osos, CA 93402
calrep@charter.net
949-400-4729 (cell)
805-439-1422 (fax)

From: [Jerry Fisher](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Thursday, June 6, 2024 6:15:58 PM

To: California Coastal Commission:

I am a resident of Morro bay, CA, & am very concerned (and angry) that **best practices for site surveys” have not been developed by the working group before site surveys have been allowed to proceed.** As a result, Equinor has begun doing surveys with:

- No independent acoustic monitoring,
- No *before during after impact control studies* of marine life,
- No clear communication plan for the fishermen
- No mitigation plan for impacts to wildlife and to stakeholders
- No enforcement of the sound perimeters
- No scout boat
- Use of a foreign vessel with questionable violations to the Jones Act (Americans on board? taking soil samples?)
- Work occurring at night and in low visibility using some type of “alternative method” of seeing without confirming their technology or methods

The impact on our precious ocean & all ocean creatures is unknown, at this point, but is, most likely, detrimental.

Please halt all site surveys until “best practices” have been developed and can be monitored & enforced. Greed appears to be underlying these current “site surveys” that have no clear guidelines/rules.

Respectfully
Jerry J Fisher

Sent from my iPad

From: [Jerry Fisher](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Thursday, June 6, 2024 6:11:09 PM

Sent from my iPad

From: [Margaret Edel](#)
To: ExecutiveStaff@Coastal
Subject: Public Comment on June 2024 Agenda Item Wednesday 6a - Executive Director's Report
Date: Thursday, June 6, 2024 6:10:39 PM

To: California Coastal Commission:

I am a resident of Morro bay, CA, & am very concerned (and angry) that **best practices for site surveys” have not been developed by the working group before site surveys have been allowed to proceed.** As a result, Equinor has begun doing surveys with:

- No independent acoustic monitoring,
- No *before during after impact control studies* of marine life,
- No clear communication plan for the fishermen
- No mitigation plan for impacts to wildlife and to stakeholders
- No enforcement of the sound perimeters
- No scout boat
- Use of a foreign vessel with questionable violations to the Jones Act (Americans on board? taking soil samples?)
- Work occurring at night and in low visibility using some type of “alternative method” of seeing without confirming their technology or methods

The impact on our precious ocean & all ocean creatures is unknown, at this point, but is, most likely, detrimental.

Please halt all site surveys until “best practices” have been developed and can be monitored & enforced. Greed appears to be underlying these current “site surveys” that have no clear guidelines/rules.

Respectfully,

Margaret Edel

Sent from my iPad