



**GOLDEN
STATE
WIND**



April 19, 2024

Dr. Richard W. Spinrad, Ph.D.
Under Secretary of Commerce for Oceans and Atmosphere & National Oceanic and Atmospheric Administration Administrator
National Oceanic and Atmospheric Administration
1401 Constitution Avenue NW, Room 5128
Washington, DC 20230

RE: Joint Position of Northern Chumash Tribal Council and Morro Bay Leaseholders on Proposed Designation of Chumash Heritage National Marine Sanctuary, NOAA-NOS-2021-0080

Dear Dr. Richard W. Spinrad,

On behalf of the Chumash Heritage National Marine Sanctuary (CHNMS or Sanctuary) nominating entity, the Northern Chumash Tribal Council (Tribal Council), and Equinor Wind US LLC, Golden State Wind LLC, and Invenergy California Offshore LLC (known as Even Keel Wind), Leaseholders of Lease Areas OCS-P 0563, OCS-P 0564, and OCS-P 0565 (together, the Leaseholders) in the Morro Bay Wind Energy Area (Lease Areas), we write with a joint position in full support for the proposed designation of the CHNMS by the National Oceanic and Atmospheric Administration Office of National Marine Sanctuaries (NOAA ONMS).

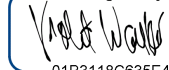
Tribal Council and the Leaseholders support the expeditious designation of the CHNMS and strongly support marine conservation. We believe that responsible offshore wind development, operations and maintenance are compatible with the CHNMS's stated "principal purpose" to promote increased protection and conservation of marine sanctuary resources, which includes reducing the threat from the impacts of climate change. It is important to all parties that the proposed Sanctuary and wind energy areas proceed as compatible, independent efforts.

Tribal Council and the Leaseholders jointly request NOAA ONMS adopt a phased approach to the Sanctuary designation, in conjunction with regulatory clarifications, to foster this compatibility with environmentally sound offshore wind development and operation. Upon initial designation, the northern boundary of the CHNMS would be located south of Diablo Canyon, but north of Port San Luis and Avila Beach. Following the initial designation, and at an appropriate time, we jointly support expansion of the full boundary of the CHNMS to connect to the Monterey Bay National Marine Sanctuary. We request that future expansion be reflected in the Sanctuary's Management Plan through inclusion of a Sanctuary Expansion Action Plan.

The designation of the CHNMS will provide immediate protection to thousands of acres of sea space, and a future expansion of the Sanctuary would result in contiguous sanctuary protection of the ocean from Greater Farallones National Marine Sanctuary to Channel Islands National Marine Sanctuary and further protect Chumash villages that lay on submerged lands, as well as habitat for southern sea otter, blue whales, and humpback whales, among other culturally important resources.

Thank you for the opportunity for Tribal Council and the Leaseholders to clarify our shared position on designation of the CHNMS. We look forward to working with you to address these comments and fulfill our mutual goals.

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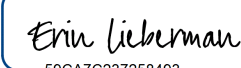


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Violet Sage Walker

Chairwoman, CHNMS Nominator and Spokesperson
Northern Chumash Tribal Council

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Erin Lieberman

Executive Vice President, Environmental Compliance & Strategy
Invenergy California Offshore LLC

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Tyler Studds

Chief Executive Officer
Golden State Wind LLC

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Martin Goff

Head of Operations, Pacific Region
Equinor US/Atlas Wind LLC

CC:

John Podesta, Senior Advisor to the President for Clean Energy Innovation and Implementation
Brenda Mallory, Chair of the Council on Environmental Quality
Elizabeth Klein, Director of the Bureau of Ocean Energy Management