

DOCKETED

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Study Outcomes from Conservation Biology Institute Project

Additional submitted attachment is included below.



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April 5, 2022

Shawn Pittard
Deputy Director
Siting Transmission, and Environmental Protection Division
California Energy Commission
715 P Street
Sacramento, California 95814

Re: Study Outcomes from Conservation Biology Institute Project, Docket No. 17-MISC-01

Dear Deputy Director Pittard:

Thank you for the opportunity to comment on the study outcomes from the Conservation Biology Institute (CBI) Project, Docket No. 17-MISC-01.

The National Audubon Society protects birds and the places they need, today and tomorrow. Audubon works throughout the Americas using science, advocacy, education, and on-the-ground conservation. State programs, nature centers, chapters, and partners give Audubon an unparalleled wingspan that reaches millions of people each year to inform, inspire, and unite diverse communities in conservation action. A nonprofit conservation organization since 1905, Audubon believes in a world in which people and wildlife thrive.

Audubon supports the state of California in its mandate to produce 100% clean energy by 2045. We understand the challenges of accomplishing this monumental task and appreciate the California Energy Commission's (CEC's) efforts to support environmentally responsible siting of offshore wind under AB525 through development of the California Offshore Wind Energy Modeling Platform.

Audubon's report, *Survival by Degrees*, documents 389 species of North American birds at risk of extinction should we reach a global warming scenario of 3 degrees Celsius above pre-industrial levels.¹ We also acknowledge that birds are already experiencing threats of a changing climate, so we need to minimize additional pressures to bird populations, even as we pursue a transition to net zero emissions. As a result, Audubon strongly supports the need for responsibly sited and operated offshore wind development to meet our 100% clean energy goals to mitigate climate change.

The key word is *responsible*. While the California Offshore Wind Energy Modeling Platform has the potential to be an excellent tool to inform siting decisions for floating wind energy offshore California, CBI's recent presentation and draft report highlight some serious shortcomings with the project's approach. These limitations, if not addressed, may limit the application of this tool and, even more concerning, may decrease public buy-in and support

¹ climate.audubon.org

for future wind energy areas proposed to bring renewable energy to California, ultimately hindering the build out of this important energy resource.

We suggest CEC and CBI institute the following changes to the modeling approach for this study, at a minimum, before finalizing the project's platform:

1. Spatial models should be rerun to include California state waters.

Even given that AB525 provides for planning offshore wind in federal waters, there is little reasonable explanation to limit the scope of the modeling study to federal waters. CEC and other California state agencies will greatly benefit from an analysis that includes both federal and state waters offshore California.

For one, leasing federal waters for offshore wind development requires work in state waters. As examples, vessel traffic associated with environmental surveys, construction, and maintenance will all occur in state waters, and transmission to bring offshore wind energy ashore will require planning within state waters.

Secondly, offshore wind is being considered for development within California state waters. The state of California and its agencies (including the State Lands Commission) would greatly benefit from the results of this project if the model were to include state waters. Doing so would be much more economical and efficient by reducing time and effort for additional analyses.

There should be no additional cost to produce a spatial model that includes state waters either financially or to the legitimacy of the model results. The avian data sources used in the analysis are not limited to federal waters, and the robustness of the data from at-sea surveys² only improves closer to shore. Running the model uses the Environmental Evaluation Modeling System (EEMS), so including state waters in the analysis would have required no extra effort or time. State waters should have been incorporated in the initial draft product and the additional time and effort required to rerun the analyses to include state waters will be minimal compared to the benefits to the state gained from a more inclusive product.

2. Spatial models should be informed by additional avian data layers as they are available.

We greatly appreciate the use of avian spatial layers as inputs into the model that incorporate both transect survey and telemetry approaches for data collection. Doing so provides a more accurate picture of how the avian community utilizes the marine environment. There are additional avian spatial data sources, completed or near completion, that we recommend incorporating into the final product:

² See Leirness JB, Adams J, Ballance LT, Coyne M, Felis JJ, Joyce T, Pereksta DM, Winship AJ, Jeffrey CFG, Ainley D, Croll D, Evenson J, Jahncke J, McIver W, Miller PI, Pearson S, Strong C, Sydeman W, Waddell JE, Zamon JE, Christensen J. 2021. Modeling at-sea density of marine birds to support renewable energy planning on the Pacific Outer Continental Shelf of the contiguous United States. Camarillo (CA): US Department of the Interior, Bureau of Ocean Energy Management. OCS Study BOEM 2021-014. 385 p.

- a. Seabird and Marine Mammal Surveys Near Potential Renewable Energy Sites Offshore Central and Southern California (PC-17-01)³
- b. Year-round and Diel Patterns in Habitat-use of Seabirds off Oregon (PC-14-03).⁴
While this study focuses on seabirds captured off the coast of Oregon, the results will include seabird movements off the coast of California.
- c. We additionally recommend incorporating avian movement tracking sources available at Movebank.org as appropriate.

We greatly appreciate this collaborative project by CEC, CCC, CBI, and Ocean Protection Council and find it to be an important step in moving offshore wind development forward in California in a manner that protects the biodiversity unique to the California Current System. We look forward to a final product that incorporates our suggestions and better advances environmentally responsible clean energy production for California.

Best regards,

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³ Ongoing study profile available at <https://opendata.boem.gov/BOEM-ESP-Ongoing-Study-Profiles-2021-FYQ4/BOEM-ESP-PC-17-01.pdf>

⁴ Ongoing study profile available at <https://opendata.boem.gov/BOEM-ESP-Ongoing-Study-Profiles-2021-FYQ4/BOEM-ESP-PC-14-03.pdf>