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**Comments on the March 22, 2022 Study Outcomes from  
Conservation Biology Institute Project Workshop**

*Additional submitted attachment is included below.*



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April 5, 2022

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 17-MISC-01  
715 P Street  
Sacramento, CA 95814

Delivered via email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

RE: Docket No. 17-MISC-01  
Comments on the March 22, 2022 Study Outcomes from Conservation Biology Institute  
Project Workshop

Defenders of Wildlife (Defenders) respectfully submits these comments on the March 22, 2022 workshop on the Conservation Biology Institute's (CBI) spatial modeling for California's offshore wind energy (OSW). Defenders, on behalf of our 323,000 members and supporters in California, works towards the protection of wildlife, ecosystems, and landscapes while supporting the timely development of renewable energy resources in California. Achieving a low carbon energy future is critical for California – for our economy, our communities, and the environment. Achieving this future—and *how* we achieve it—is critical for protecting California's internationally treasured wildlife, landscapes, productive farmlands, and diverse habitats.

We appreciate the Commission staff and CBI's efforts in developing a spatial model for OSW planning. OSW planning and AB 525 implementation require transparent, data-driven spatial mapping tools to enable informed decision-making. The spatial modeling tools need to be readily available and user-friendly so agencies and stakeholders can actively engage and issue

spot for OSW in both federal and state waters. CBI's tool is a strong step towards meeting that need and we are excited to see the progress. Moving forward we offer the following recommendations:

### State Waters

OSW development on the outer continental shelf (OCS) requires infrastructure development including transmission lines and port facilities in state waters. Some developers have shown ill-conceived interest in developing OSW projects within state waters. Spatial mapping tools must be expanded to include state waters to enable OCS OSW transmission and port facilities planning. Spatial mapping will also allow comparative analysis of proposed OSW development in state and federal waters. Including data sets for state waters is essential for the analysis needed to concurrently meet California's goals under AB 525 and 30 x 30.

### Additional Data Required for Environmental Considerations

The model for High Environmental Considerations appears to be limited to whales, leatherback sea turtles, and seabirds. The model does not appear to include benthic habitats and fish, resulting in an incomplete depiction of wildlife and ecosystems that must be considered when planning for OSW. The model needs to include:

- Benthic habitats including Habitats of Particular Concern, corals, and sponges
- Marine mammal prey resources such as krill
- Morro Bay Small Resident Population harbor porpoise
- Essential fish habitat
- Coastal pelagic species
- Highly migratory species
- Groundfish
- Salmon

### Areas Precluded from Development

Areas legally or operationally precluded from development should be included in the model to provide a realistic understanding of OSW development potential. Areas legally precluded include but are not limited to marine sanctuaries, marine protected areas, and Department of Defense communications and training zones.

### Sand to Steel Modeling

OSW development cannot exist without coastal development including ports/marine terminals, transmission landfall substations, and ultimately gen-tie to the transmission grid. The OSW marine spatial modeling needs to be integrated into onshore modeling. The SB 100 modeling that includes environmental data sets would be a reasonable option.

## Conclusion

Integration of state waters, a broader range of wildlife and ecosystem modeling, waters excluded from development, and onshore modeling is essential to plan for California's OSW future that balances clean energy development with wildlife and ecosystem protection. We strongly support continued investment in the OSW model to keep the analysis current and relevant as the planning and development of OSW progresses.

Thank you for the opportunity to provide initial comments on the March 22, 2022 Study Outcomes from Conservation Biology Institute Project Workshop. We look forward to actively participating in the development of future iterations of the OSW modeling tools. Please contact Pamela Flick at (916) 442-5746 or [pflick@defenders.org](mailto:pflick@defenders.org) or Kate Kelly at (530) 902-1615 or [kate@kgconsulting.net](mailto:kate@kgconsulting.net) with any questions.

Sincerely,



Pamela Flick  
California Program Director



Kate Kelly  
Consultant