

October 25, 2018

John Laird, Secretary for Natural Resources
Chair, California Ocean Protection Council
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Re: California Ocean Protection Council Proposition 84 Competitive Grant Program and NGO Offshore Wind Priorities

Dear Secretary Laird and members of the Ocean Protection Council:

Our organizations, the National Resources Defense Council, Sierra Club, Audubon California, Environmental Defense Center, and Defenders of Wildlife, write in the interest of advancing responsible offshore wind energy in California. Since the first convening of the California Renewable Energy Task Force in 2016, our organizations have been engaged in advocating at both the state and federal levels in support of a precautionary, inclusive, and scientifically-based offshore wind development process. Such a process will safeguard California's iconic and ecologically rich marine environment *and* foster more efficient and lower-conflict deployment of offshore wind energy in the state. We are writing to underscore some of our priorities for offshore wind development, one of which includes support for the scientific research we believe will best serve California's unique and precious marine environment.

1.) Spatial analysis of existing data in the Data Basin and creation of an environmental sensitivity layer is an NGO priority for offshore wind energy development.

We strongly support the joint Point Blue, Conservation Biology Institute, and EcoQuant grant proposal to synthesize available spatial data along the California coast and to develop decision-support optimization models that utilize the relevant data in the Data Basin Gateway. NRDC also supported the CalPoly tradeoff analysis proposal, which has a similar objective of synthesizing available data to identify environmental sensitivities and to create spatial decision support tools. While we support the package of Marine Renewable Energy proposals that are proposed for OPC Proposition 84 funding, a comprehensive spatial analysis of the environmental data in the Data Basin is still needed.

Our organizations support the Data Basin Gateway effort and appreciate CEC and BOEM's work to make it an inclusive, collaborative, and transparent federal, state, and stakeholder collaboration. We acknowledge the rigorous efforts that have led to the creation of the Data Basin, yet more time and resources are needed to fully analyze and process the 650+ data sets currently in the Data Basin. While this data collection effort has been very successful, there remain critical data gaps and spatial considerations. There is an outstanding need for decision-makers and stakeholders to be able to analyze multiple layers simultaneously and provide fine scale detail in certain areas of interest. At present, the low resolution of and gaps inherent in some of the data preclude such careful analysis. It is only by conducting such analyses that we can identify potential conflicts and ensure there are comprehensive biological monitoring efforts in place if and when permitting occurs.

2.) California Energy Commission and the Ocean Protection Council leadership in offshore wind energy development is crucial.

Our groups have consistently advocated in favor of a scientifically and stakeholder-driven siting process that prioritizes environmental sensitivities. CEC and OPC are well positioned to help identify and elevate stakeholder priorities and concerns at the federal level. As this meeting demonstrates, OPC will play a key role in funding research to inform marine renewable energy development. Our organizations have stated repeatedly that we would like to have a more inclusive and transparent process to ensure that site selection reflects our environmental concerns. The state can lead in such a process, and OPC is poised to lead in environmentally-sensitive lease area identification and in communicating ecological concerns. The interest in OSW will extend beyond the current state administration. Our organizations urge OPC to be visionary and to work with CEC to lay out a process that sets a high environmental bar for this new technology and ocean use.

3.) Focus on an appropriate size for initial offshore wind development.

Given that there are and will be data gaps and that the potential impacts of large-scale floating wind technology on marine resources are unknown, we recommend that initial developments are relatively small and scale up incrementally, following the implementation of a rigorous monitoring protocol that evaluates impacts during each stage of development. Because impacts of offshore wind on wildlife likely increase with the scale of a project, it is advisable to test smaller-scale developments before permitting and constructing large developments. The opportunity to scale up a project should be contingent on the careful evaluation of the results of the monitoring program. Starting small worked to build consensus among stakeholders and ultimate success at Block Island—we believe this approach will benefit the floating offshore wind industry on the West Coast.

In sum, our organizations believe that if offshore wind in California is to be developed, it should be done in a science-based, environmentally-sound manner that reflects the vital importance of California's marine environment. We encourage OPC to lead in guiding the state toward a holistic, science-based process that establishes a robust environmental baseline. Funding research to inform siting and leasing decisions that are guided by comprehensive baseline analysis and research that gives full consideration of potential impacts to sensitive marine areas and species will be essential for the development of offshore wind energy in California.

Thank you for considering these comments.

Sincerely,

Garry George
Renewable Energy Director
California Audubon

Kim Delfino
California Program Director
Defenders of Wildlife

Sandy Aylesworth
Ocean Advocate
Natural Resource Defense Council

Sarah Freidman
Senior Campaign Representative

Sierra Club

Kristen Hislop
Marine Conservation Program Director
Environmental Defense Center