NATURAL RESOURCES DEFENSE COUNCIL

September 12, 2011

The Honorable John Laird, Secretary for Natural Resources
Chair, California Ocean Protection Council
California Natural Resources Agency
1416 Ninth Street, Suite 1311

Submitted via Email to: opc.comments@scc.ca.gov

Re: NRDC Comments on Draft OPC Strategic Plan, 2012-2017

On behalf of the Natural Resources Defense Council (NRDC), and our 250,000 California members and activists, we would like to thank the Ocean Protection Council (OPC) Members and Staff for their hard work and dedication in preparing a Strategic Plan that will chart a path for OPC to be as successful as possible in the next five years.

With our colleagues at the Ocean Conservancy, the Monterey Bay Aquarium, the Nature Conservancy, and California Coastkeeper Alliance, we have submitted comments that address the entire Strategic Plan. Here, we wish emphasize points of particular importance to NRDC.

1. **Proactive, coordinated ecosystem-based planning and management paired with robust and accessible science and geospatial information, are necessary to tackle current and future coastal and ocean management challenges.**

Despite significant financial constraints among California agencies, the OPC is empowered with information, tools, and a leadership mandate that can ensure the robust protection and management of valuable coastal and ocean ecosystems for the enjoyment of current and future generations. In the next five years, the number of human uses of the oceans will increase – myriad new activities will be proposed and existing activities will expand – further stressing already embattled ecosystems. The OPC is well aware of these challenges and the fact that single-sector approaches cannot adequately address them. We applaud OPC's work over the past two years to explore improved coordination and management of our coasts and oceans using an ecosystem-based planning and management approach that is based on geospatial information sharing.

We strongly support the OPC's efforts -- such as those described in the OPC Staff Coastal and Marine Spatial Planning Memo, November 9, 2010 -- offering a conceptual work plan for fulfilling AB 2125 (Ruskin) and articulating guiding principles, objectives, and specific activities for better tackling management challenges. This important work will be built upon in the new Strategic Plan, particularly through improved planning and management of multiple, overlapping ocean uses and the integration of science into decision making. We have

111 Sutter Street
20th Floor
San Francisco, CA 94104
TEL 415 875-6100 FAX 415 875-6161

suggested and strongly support changes to Strategic Plan Sections D and E contained in the group comment letter. We believe these modifications of the plan will ensure the OPC's leadership in effective application of geospatial information, agency coordination, planning and management of our coasts and oceans.

We have and will continue to strongly support the OPC 's endeavors to ensure scarce management resources are used as efficiently as possible through sharing and pooling of data and information. We applaud use of ecosystem-based management and the development of approaches that account for cumulative impacts, address current conflicts among various users of the ocean, and better prevent future conflicts.

2. Offshore renewable energy holds significant promise for California's economy and environment. OPC's leadership and improved access to geospatial information is needed to reap these benefits while minimizing conflicts or negative impacts to the marine environment.

As the OPC is aware, California has significant potential to generate clean, renewable energy from offshore wind, wave, and tidal power. Manufacturing, installing, and maintening offshore energy conversion devices could create much needed jobs in California. Wave energy alone has the potential to generate 23 percent of California's current electricity consumption.[1] Recent estimates show that California's average wind energy potential developable annually is 513-661 TWh.[2] 90% of that potential is in deep waters of 50-200m; 51-93 TWh exists in waters 0-50m. With floating wind turbines being tested in Denmark and information being gathered and shared with Lawrence Livermore National Laboratory atmospheric scientists, deep water wind may soon be harvested off California's coast.[3]

However, California is quickly falling behind other coastal states including Oregon, Maine, New York and New Jersey in deploying offshore renewable energy projects. The OPC's leadership and coordination is needed to help with identifying the best locations for pilot projects sites. These will be areas where devices have minimal conflicts with existing uses of the ocean, can scale up gradually, and will have minimal negative impacts on the marine environment. Demonstrated progress is also necessary to ensure California is eligible for funding and other assistance from the Department of Interior and the Department of Energy.

Developers in California have struggled to overcome technological, regulatory, and financial challenges. A number of projects have stalled because of the difficulty of obtaining financing and the challenges of gathering baseline environmental data necessary for completion of regulatory documentation. Some projects experienced technological hurdles; other projects encountered fierce resistance and concern from existing ocean users such as fishers and recreational users. Thus, we strongly support the work of the Marine Renewable Energy

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[1] California Energy Commission, Ocean Energy http://www.energy.ca.gov/oceanenergy/index.html; "However, economics, environmental impacts, land-use and grid interconnection constraints will likely impose further limits to how much of the resource can be extracted."

[2] Michael Dvorak, et. al, *California Offshore Wind Energy Potential*, Renewable Energy 35 (2010) 1244-1254.

[3] https://www.llnl.gov/news/newsreleases/2011/Jun/NR-11-06-02.html

Working Group in increasing agency coordination and enhanced availability of information necessary for California to reap the gains of new renewable energy projects that are carefully and appropriately sited to minimize negative environmental impacts. We encourage the OPC to act boldly in this issue area.

We suggest replacing Action 10.1.2 , with a more ambitious action that will significantly help advance carefully sited offshore renewable energy, for example: *"facilitate the development of at least one pilot offshore renewable energy project to gather data about the impacts and the prospects of this energy source.*" Achievement of this action would naturally encompass the activities currently described under Actions 10.1.2

We support Action 10.1.3 and encourage the OPC to move quickly with its implementation. The OPC should consider development of a pilot geospatial information management system, using existing data, specifically geared toward the siting of offshore renewable energy. This pilot project would leverage previous investments in data collection and would demonstrate how a geospatial information management system can help overcome specific management challenges, thus supporting the cross-cutting goals of Strategic Plan Section E.

The OPC could also assist with tackling questions such as: methods to integrate offshore generation with existing grid planning and operation; extension of transmission grid offshore; determination of deep-water design types best suited for California.

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Thank you again for your dedication to production of a new OPC Strategic Plan that is carefully crafted to tackle the most important challenges facing our coasts and oceans and for your commitment to incorporating stakeholder input into the drafting of the Plan. We look forward to reviewing the final document and to the implementation of the Final Plan.

Sincerely,

Leila Monroe, Staff Attorney, NRDC Oceans Program