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**Defenders of Wildlife Comments on Central Coast OSW Workshop
17-MISC-01**

Additional submitted attachment is included below.



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September 30, 2020

The Honorable Karen Douglas, Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Electronically filed to the Docket

RE: Defenders of Wildlife's Comments – July 1, 2020, CEC Workshop on Central Coast Offshore Wind Energy (Docket No. 17-MISC-01)

Dear Commissioner Douglas,

Defenders of Wildlife (Defenders) appreciated the California Energy Commission (CEC) workshop on July 1, 2020, and thanks the CEC for the opportunity to comment on Docket No. 17-MISC-01. Offshore wind (OSW) along the California coast offers the potential for a consistent stream of renewable energy that could provide significant energy, climate, and economic benefits for local communities, California, and the western grid. Defenders supports responsibly developed offshore wind energy as an important part of a clean energy portfolio. OSW energy can and must advance in an environmentally responsible manner to ensure that it plays a reliable role in meeting the ambitious climate and clean energy goals throughout the west coast. At the same time, OSW development must safeguard valuable and vulnerable ocean and terrestrial habitats, fish and wildlife, cultural resources, and communities.

Thus far, California's energy development has been terrestrial utility scale conventional and renewable energy generation and transmission that evolved within the framework of existing developed land and transmission and, in places, reflect ill-informed choices made decades ago. California has seen that unplanned, opportunistic, and poorly conceived generation and transmission development results in projects that struggle to be viable, are unnecessarily expensive, and cause significant and avoidable impacts to natural resources, cultural resources, and communities. Previous lack of planning has resulted in lost time, increased costs, and a lack of certainty. About a decade ago, California began to integrate land use information into its energy modeling and procurement. While progress has been made in some regions, we continue to advocate for improvement so that energy and transmission deployment is directed to "low conflict" locations.

Utility-scale OSW is new to the California coast and this region presents a clean slate for the development of this renewable energy technology. Development of OSW on the California coast represents an unparalleled opportunity to proactively plan utility-scale renewable energy generation and transmission from conception – based on the best available science, public policy, and collaborative stakeholder involvement – to identify the best project locations and rapidly meet our clean energy needs while protecting natural and cultural resources and providing economic benefits.

Smart from the Start

Smart from the Start planning principles use science, geospatial analysis, and stakeholder input to locate new generation and transmission to avoid unnecessary conflicts. Elements of this approach have been used to develop the Desert Renewable Energy Conservation Plan, the San Joaquin Valley least-conflict studies, and the California Energy Commission’s busbar mapping work for the California Public Utility Commission and the California Independent System Operator. Smart planning allows for faster and more reliable development.

Smart from the Start begins with identifying high-value natural, cultural, and economic resources in regions where development is anticipated. Identifying important natural resources is critical to ensuring that California retains the ability to protect biodiversity, water quality, and other ecosystem services by maintaining climate resilience and connected landscapes that can counter the current threats posed by climate change and increasing rates of species extinction. The rapid and reliable deployment of renewable energy must be developed without undercutting California’s other environmental goals.

After identifying high-value resources, the process seeks to understand how the components of anticipated development could modify the environment. The environmental, cultural, and economic settings, in conjunction with anticipated development needs and footprint, provide the baseline to seek areas where development can avoid or minimize impacts on high-value resources. These “least-conflict” areas must be identified before designating lands for development or considering specific development proposals to avoid the stranded costs of ill-sited projects.

Least-conflict areas should then be prioritized and development can be directed to the identified least-conflict areas. Development within least-conflict areas minimizes impacts on resources, which streamlines project development time, reduces costs, and increases project viability and certainty.

California Offshore Wind

OSW responsibly planned and developed to avoid, minimize, and mitigate potential environmental and economic impacts will deliver substantial benefits to California and the west in our urgent transition away from dirty, climate-altering fossil fuels to a clean energy economy. Smart from the Start principles should inform agencies and stakeholders on how to proceed with developing OSW responsibly. Several decades of offshore wind development in Europe have shown that OSW

power can be developed responsibly to protect local wildlife, provided that all siting and permitting decisions are based on sound science and informed by key experts and stakeholders. The European experience shows us that avoiding sensitive habitat areas, requiring strong measures to protect wildlife throughout each stage of the development process, and implementing comprehensive monitoring of wildlife and habitat before, during, and after construction are essential for the responsible development of OSW energy.¹ Smart from the Start principles and practices must be used to seek areas where deployment, generation, transmission, and operations and maintenance (O&M) activities for OSW can avoid or minimize impacts on high-value resources at sea and on land.

Land and Sea

California OSW is expected to include:

- floating offshore wind farm(s) (OSF)
- port improvements including marine terminals and tower assembly and maintenance areas
- transmission cables within the OSF and between shore, port, and marine terminals
- substations
- GenTie
- grid improvements needed to provide energy to end users

OSW does not exist in a vacuum. Shoreside components are part and parcel of any OSF project and must be considered within the scope of the whole project during planning, environmental review, leasing, and land-use permitting. In fact, both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA) require analysis of projects “as a whole” and prohibit piecemealing the environmental review of projects. Therefore, we urge that OSW planning must include the identification and generation of data in both the marine and terrestrial environments.

The California Offshore Wind Energy Gateway (OSW Gateway)² should be used to house the geospatial data needed to help identify least-conflict areas for OSW development on the marine side. The OSW Gateway should be expanded to incorporate natural, cultural, and economic resource data to support the analysis of landside OSW facilities, including marine terminals and transmission infrastructure. Data Basin in general, and the OSW Gateway in particular, provide essential platforms for engagement with tribal governments, the environmental justice community, labor/workforce development partners, and economic development interests.

The use of best available science, geospatial analysis, and community engagement will enable California to direct OSW development to least-conflict areas and implement measures to enhance

¹ O'Brien, Sue. “Lessons learned from the European experience.” Presentation at the *State of the Science Workshop on Wildlife and Offshore Wind Energy Development*. Nov. 13-14, 2018.

² <https://caoffshorewind.databasin.org/>

and/or protect high-value resources so that valuable OSW resources can help meet essential climate goals. The California Energy Infrastructure Planning Analyst (CAEIPA)³ provides a greater level of technical analysis for terrestrial planning of generation and transmission. The busbar mapping and modeling⁴ being developed by the California Energy Commission (CEC) for use in the Integrated Resource Planning proceeding further refines the CAEIPA.

The OSW Gateway and the CAEIPA provide the tools to plan for California OSW as a whole, including deployment, port and marine terminal development, power generation, landside O&M, and transmission. Terrestrial energy planning tools, such as the CAEIPA and the busbar mapping process, must be integrated into the comprehensive planning effort for OSW to provide a seamless planning platform that connects least-conflict marine areas with least-conflict terrestrial areas.

If California engages in a broader planning effort to identify renewable energy locations and transmission – similar to what was done through the Renewable Energy Transmission Initiative (RETI) – we urge that the information generated through the OSW planning process is aligned with that effort.

Conclusion

Utility-scale OSW offers a unique opportunity for California to proactively plan for meeting its energy and economic development needs while protecting natural and cultural resources. Defenders believes that offshore wind energy can and must advance in an environmentally responsible manner to ensure that it plays a key role in meeting U.S. climate and clean energy goals while safeguarding vulnerable habitat, wildlife, communities, and economies. We believe that California can enact a comprehensive response to climate change by meeting urgent clean energy goals and protecting the landscapes and biodiversity necessary to retain a resilient environment. We urge California to set a precedent for environmentally responsible OSW development in the United States with Smart from the Start planning to move the OSW wind industry forward in a sustainable form. We believe this is essential for ensuring that critically needed offshore wind energy can scale up to its full potential as a significant clean energy solution. We welcome the opportunity to meet with you, and your staff, at any time to discuss these matters. Please contact Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,



Pamela Flick
California Program Director



Kate Kelly
Consultant

³ <http://ceipa.databasin.org/>

⁴ <https://www.cpuc.ca.gov/General.aspx?id=6442459770>