

DOCKETED

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Comments on June 27, 2022 AB525 Workshop

Additional submitted attachment is included below.



California Energy Commission
Docket 17-MISC-01
June 27, 2022

Re: June 27, 2022 AB525 Workshop on Offshore Wind

Testimony not given at the workshop due to cut off of public comments.

Introduction: Garry George, Director, Clean Energy Initiative of National Audubon Society.

First of all thanks to the Energy Commission, Commissioner Vaccaro and the Commission staff for this workshop and the work on the draft report, and to the presenters for their presentations.

Audubon worked with the industry and Asm Chu's staff on the language of AB525 and joined the industry in supporting the legislation to support protection of coastal and marine resources, identification of stakeholders, and the "least conflict" planning process among others.

Because of climate change's impact on birds we support California's policies that require 60% clean energy by 2030 and 100% by 2045 including environmentally responsible offshore wind.

Although those goals are regulatory and are mandates, planning goals under AB525 are not.

Planning goals in the draft report are not a ceiling or a floor for the development of offshore wind in California and should not be seen as market drivers.

They are a feasible starting place for planning based on current exiting analysis by California state agencies and others. As CEC staff notes in their draft report, these goals may change up or down after the seascape analysis, which we hope will begin soon as it has already been delayed for 2 months since the release of the draft.

Other states set or raised goals based on new data and many of those states conducted a marine spatial planning before setting or raising their goals. California has not. Although rapid, AB525 is an opportunity to do so and we trust Energy Commission to propose appropriate goals for offshore wind in their final report in 2023 for stakeholders to comment on.

Feasibility is not defined in AB525 as only technological feasibility. The presentations by NREL and UC Berkeley are great data to consider as a ceiling for offshore wind, but the constraints and exemptions analysis is not clear, especially regarding environmental, social and ocean user conflicts.

California Code of Regulations, title 20, section 1201(h), defines “feasible” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, **environmental**, legal, **social**, and technological factors.”

We support the draft plan and the goals released on May 6 as a starting place for the seascape analysis by the Commission staff and do not support setting initial goals that have not considered environmental and social values and other ocean users in setting those goals, as required by AB525 and California Code of Regulations.