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Bat Conservation International Comments on 23-ERDD-01 Advancing the Environmental Sustainability of the Clean Energy Transition

Additional submitted attachment is included below.

BAT CONSERVATION INTERNATIONAL

January 4, 2024

California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Docket number 23-ERDD-01
Advancing the Environmental Sustainability of the Clean Energy Transition

Thank you for hosting the Staff Workshop Funding to Advance the Environmental Sustainability of the Clean Energy Transition (Enviro-SET) on December 13, 2023. We appreciate the opportunity to comment on the forthcoming solicitation regarding advancing the environmental sustainability of the clean energy transition.

At Bat Conservation International (BCI), we support using bat-friendly wind energy to help reduce the impacts of global climate change on bat species worldwide. In North America, experts estimate believe that 82% of species are at risk of population decline from the impacts of climate change in the next 15 years. However, wind energy is also a threat to certain bat species. In North America, the threat is primarily to hoary bats, silver-haired bats, and eastern red bats. These species, and hoary bats in particular , face population declines of more than 50% without immediate measures to reduce bat fatalities. Urgent action is needed to limit the impact of wind energy on bat species in North America and ensure that the clean energy transition protects biodiversity.

BCI commends the commitment of the California Energy Commission to invest $3 million in environmental sustainability of clean energy. While all five topic areas are important, we especially appreciate the recognition of the need to assess and minimize environmental and biological resource impacts of clean energy deployments. The commitment of $3 million to these topic areas is a substantial investment; unfortunately, the portioning of funding through five broad and dissimilar topic areas limits the potential impact of work on each topic. Therefore, we encourage CEC to enhance and expand established projects and funding sources to maximize the impact of this investment.

We encourage the CEC to target the funding opportunity under Group 2 to the taxa and critical knowledge gaps that are most important for species directly impacted by wind energy infrastructure, which are bats and with limited minimization techniques. Wind energy has the potential to cause a 50% or more decline in the hoary bat population by 2050. Rapid reductions in hoary bat, silver-haired bat, and eastern red bat populations as a result of wind energy infrastructure has resulted in the recommendation of endangered status for these species by the Canadian Committee on the Status of Endangered Wildlife in Canada and the addition of the hoary bat to the US Fish and Wildlife Services' work plan for species status assessment in 2027; demonstrating potential for widespread regulatory impacts on wind energy due to its current impact on bat species.

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January 4, 2024

Research priorities for bats include:

1. Fatality reduction measures (implement existing and new scalable technological solutions and evaluate with effectiveness monitoring)
Fatality reduction measures are imperative to protect bat populations. Current best practices include curtailing wind turbines during low wind speeds at night throughout the bat active season. In the Midwest United States, where curtailment is implemented July-September, this results in approximately 1% loss in Annual Energy Production and a 50% reduction in bat fatalities. California has areas with a potentially longer bat active season that could require an increased period of curtailment, increasing the amount of lost energy. Understanding ways to reduce impacts to bats through siting and operation in areas outside the Midwestern United States is imperative to California's clean energy future.

2. Measuring population impact (fatality rates and population trends)
We lack a solid understanding of the current population status of the bat species most impacted by wind energy. Establishing long term population monitoring and robust fatality monitoring (including reporting) in California will document the impact to bat species and help identify to what degree wind energy fatalities contribute to bat population declines in the region.

3. Understanding behavior that contributes to fatalities (both local at wind energy facilities and range wide)
Some bat species appear uniquely susceptible to impacts with wind turbines. Understanding the migration patterns and navigation mechanisms that contribute to this susceptibility can help identify novel approaches to reduce impacts of wind energy infrastructure on bats. Additionally, understanding year-round habitat use and movement ecology can help identify places and periods that present the most risk for bat collisions.

Thank you for the opportunity to comment on the development of the solicitation advancing environmental sustainability of the clean energy transition. We applaud CEC's effort and financial commitment to reduce negative impacts of clean energy on biodiversity.

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