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| <b>Filer:</b>           | susan fleming   |
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June 26, 2024

**RE: Assembly Bill 525 Strategic Plan**

On behalf of the undersigned groups, we submit these comments to the California Energy Commission on the Assembly Bill (AB) 525 Strategic Plan for offshore wind energy developments in federal waters off the California coast.

Commissioners and staff have invested a significant amount of time and effort developing a strategic plan that provides a comprehensive overview of the “[p]otential impacts on coastal resources, fisheries,” and other resources, as well as “strategies for addressing those potential impacts,” as required by AB 525. We greatly appreciate the Commission’s leadership in advancing responsible offshore wind development and support the Commission moving forward with approving the version of the plan released in January 2024, or something very similar.

In light of the complexity and significance of the issues addressed in the strategic plan, and to ensure that all parties have adequate time to review and provide meaningful input, we respectfully request that the Commission delay the vote to approve the plan by two weeks to its next business meeting. This extension will allow for more thorough public engagement and ensure that the final plan benefits from the most comprehensive and informed feedback possible.

In particular, we appreciate that the January 2024 draft strategic plan provides an overview of the various potential environmental effects of offshore wind development, including: risks to marine biological resources, benthic habitat, birds and bats, entanglement risks, elevated underwater noise, and changes to nutrient upwelling.<sup>1</sup> We also appreciate that the January draft plan includes potential “avoidance, minimization, and mitigation strategies” that could be used to manage these risks, such as robust environmental monitoring and research, design features that reduce bird and bat collision risks, and adaptive management protocols.<sup>2</sup> The most recent version of the plan, released on June 25, 2024, appears to include this content as well. This analysis is required by AB 525, and should not be removed from the adopted plan.

While the plan and the process could be optimized in various ways – we continue to stand by the recommendations we provided in our April 2024 letter – the strategic plan will serve as a helpful reference in the years to come. Further, as noted in the January draft plan, “[f]loating offshore wind technology is in its infancy,” and the effects of the technology are uncertain<sup>3</sup>, and we urge the Commission to periodically update the plan with new information, technologies, and management measures.

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<sup>1</sup> See California Energy Commission, Assembly Bill 525 Offshore Wind Strategic Plan (Jan. 2024) Vol. II at 54-59, Vol. III at 17-19; <https://www.energy.ca.gov/data-reports/reports/ab-525-reports-offshore-renewable-energy>

<sup>2</sup> Vol. II. At 61-63, Vol. III at 19-23, 30-31.

<sup>3</sup> Vol. II. At 49.

Renewable energy, including offshore wind, provides an important opportunity to combat the climate crisis, reduce air pollution, and support the growth of a green economy; and the Commission's plan is an important and useful document that will help support responsible development of the industry.

Sincerely,

Irene Gutierrez  
Senior Attorney  
Natural Resources Defense Council

Mike Lynes  
Director of Public Policy  
Audubon California

Susan Jordan  
Executive Director  
California Coastal Protection Network

Lisa Belenky  
Senior Counsel  
Center for Biological Diversity

Azsha Hudson  
Marine Conservation Analyst and Program  
Manager  
Environmental Defense Center

Matthew Simmons  
Climate Attorney  
Environmental Protection Information  
Center

Amy Wolfrum  
Director  
California Policy and Government Affairs  
Monterey Bay Aquarium

Garry George  
Senior Director, Climate Strategy  
Clean Energy Initiative  
National Audubon Society

Julia DeGraw  
West Coast Senior Campaign Manager,  
Offshore Wind Energy  
National Wildlife Federation

Michael Stocker  
Executive Director  
Ocean Conservation Research