



To: Jean Thurston, Coordinator
Bureau of Ocean Energy Management (BOEM) Renewable Energy Task Force
Office of Strategic Resources
760 Paseo Camarillo (Suite 102), Camarillo, California 93010

RE: Commercial Leasing for Wind Power Development on the Outer Continental Shelf (OCS)
Offshore California—Call for Information and Nominations (Call)
<http://www.regulations.gov> Docket No. BOEM-2018-0045

January 28, 2019

Dear Ms. Thurston:

Thank you for the opportunity to comment. We appreciate the effort that the BOEM California Intergovernmental Renewable Energy Task Force has made to promote a data-based planning process for offshore wind energy installations in California. We are writing to highlight the need for comprehensive information about marine bird distribution in the vicinity of the three wind energy Call Areas proposed for Commercial Leasing on the Outer Continental Shelf of California.

The Pacific Seabird Group (PSG) is an international, non-profit organization that was founded in 1972 to promote knowledge, study, and conservation of Pacific seabirds with a membership drawn from the entire Pacific basin, including Canada, Mexico, Japan, China, Malaysia, Australia, New Zealand, and the USA. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. PSG members serve as scientific experts and conservation leaders within their local communities. Collectively, the Group's members have a great deal of knowledge and experience with respect to the distribution of resident and migrant seabirds in California waters.

The Pacific Seabird Group gratefully acknowledges your efforts to get scientifically peer-reviewed marine bird data onto the California Offshore Wind Energy Gateway Databasin. The ocean is a characteristically dynamic environment, and that environmental fluctuation is likely to increase with climate change. It is important that BOEM consider the predictability of critical foraging and migration areas, and the potential for their distributions to change within the 30-year period of these leases. Further site-specific surveys and predictive mapping will be needed to be able to make comprehensive planning and mitigation scenarios.

While BOEM has called for researchers to submit their data to the Databasin, this can be a time-consuming task without financial incentive. Researchers have expressed concern over the use and misuse of their independent, grant-funded data. It is the agency's responsibility to reach out to researchers for access to marine bird data and supply terms and conditions in a data use agreement. To maximize transparency of this process, it is also necessary that BOEM report what data they use to inform the site characterization of the Call Areas.

Without more detailed location information on the proposed wind energy areas, it is difficult to effectively respond with species-specific presence or abundance predictions. While the data collection effort by BOEM is commendable, it is difficult for stakeholders to make certain that all relevant data were collected and appropriately used. Transparency in this process will facilitate this assessment.

We propose a working group be formed, to catalog current research efforts and gain access many more data sources. PSG could be poised to help coordinate this effort by reaching out to researchers who already share data as part of our regional seabird monitoring database. We urge BOEM to take action to ensure that the proposed projects in the Call Areas advance in a manner that preserves and maintain seabirds.

Thank you for your consideration,

Mark Rauzon
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