



**The Wildlife Society**  
**Western Section**  
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February 11, 2025

Ms. Lisa Gilbane, Chief  
Environmental Assessment Section, Office of Environment  
Bureau of Ocean Energy Management  
760 Paseo Camarillo, Suite 102  
Camarillo, California 93010

**Subject: California Offshore Wind Programmatic Environmental Impact Statement**

**Summary of Comments**

On behalf of the members of the Western Section of the Wildlife Society, the Conservation Affairs Committee submits the following comments on the California Offshore Wind Programmatic Environmental Impact Statement (PEIS) dated November 2024. Our review of the PEIS found that there was insufficient information presented to adequately evaluate most of the impacts to wildlife, and where impacts were identified they are unacceptably high.

**The Basis for Comments by the Western Section of The Wildlife Society**

TWS was founded in 1937 and is a non-profit professional society representing wildlife biologists, managers, and educators dedicated to excellence in wildlife stewardship through science and education. Our mission is to inspire, empower, and enable wildlife professionals to sustain wildlife populations and habitats through science-based management and conservation.

The Western Section of TWS represents over 1,000 professional wildlife biologists residing in Nevada, California, Hawaii, and Guam. Our members are working wildlife biologists and wildlife professionals with extensive experience in wildlife population research and monitoring, conducting species- and community-specific wildlife surveys, evaluating sensitive species listing, and brokering mitigation agreements and compliance. Our collective professional training and experience provide a strong and unique basis for providing the following comments relating to the PEIS.

**Comments and Concerns**

- For a project of this scale to be successful, and to comply with the National Environmental Policy Act, the voices of all the people affected must be heard. To that end we are concerned that the Submission of Public Comments section of Federal Register Notice of Availability of the California Offshore Wind Draft Programmatic Environmental Impact Statement states “The 90-day comment period **begins** on February 12, 2025” (emphasis

added). Though obviously a mistake, this mistake indicating that the 90-day comment period would span from February 12 to mid-May may have excluded the voices of concerned members of the public. Therefore, the public comment period should be extended to May 12, 2025 to be consistent with the dates posted on the Federal Register.

- The structure of the PEIS assessing the impacts of the five leases, two proposed areas in northern California and three areas in central California, does allow for assessing cumulative impacts to the wildlife affected. However, this format does not take into consideration the unique aspects of these two regions. For instance, the black-footed albatross has a “max” predicted density in summer (Figure 3.3.3-13) in the Humboldt lease and a much lower predicted density in the Morro Bay lease. The project areas analyzed in the PEIS are two distinct geographic locations and it is inappropriate to have a single biological analysis for many of the species. Analysis should be completed initially on the isolation or connection of the wildlife, and other biological elements, to inform where impacts may be evaluated across the project area versus at a local level. For example, the marbled murrelet and black footed albatross should be evaluated separately for the Morro Bay lease and Humboldt lease.
- The 40 biological mitigation measures identified in Table 2-3 and described in greater detail in Appendix E are impossible to assess due to the lack of details given in the PEIS. For instance, MM-13 in Table 3.3.1-3 is summarized as: “This measure creates annual reporting requirements for dead or injured birds or bats, which would improve the overall understanding of bird and bat interactions with wind farms”. If the injured or killed birds and bats fall into the water, how would they be counted? What are the thresholds of fatality for each species upon which actions must be taken? Without a clear explanation how the counting of fatalities will be conducted, or the thresholds, it is not possible to determine if the conclusions that the collected fatality data will be sufficient to assess and improve our understanding of the impact of wind farms. The mitigation measures need to be more detailed so that we can assess their feasibility and capability to avoid, minimize, and mitigate for potential impacts.
- As an example of the uncertainties associated with the level and severity of the impacts identified in the PEIS, the second paragraph of the conclusion of Alternative C on ESA-Listed marine mammal species (Section 3.3.6.5.5) reads:

Secondary entanglement risk (from anchoring and presence of structures) has the **potential to result in population-level effects compromising the viability of ESA-listed species** (emphasis added). Similarly, WTG noise is expected to result in recoverable population impacts, mainly driven by the uncertainty of that IPF. Uncertainty also surrounds presence of structures–related impacts associated with hydrologic and oceanographic effects.

We are extremely concerned with blanket statements such as the emphasized text above stating that the project has the potential to cause the extinction of certain species of marine mammals. This is an unacceptable, and avoidable, impact. Additional research is needed to determine the level of impact that this project may have on our environment. Additionally, the

remaining portions of this “conclusion” is based on “expected” results and “uncertainty” which surrounds other impacts. More time and research is required to determine what the level of these impacts will be and to determine functional avoidance and minimization measures to ensure that there are no significant, let alone, extinction level impacts.

### **Concluding Remarks**

Thank you for the opportunity to provide comments on the California Offshore Wind Programmatic Environmental Impact Statement. We appreciate consideration of these comments and encourage the reassessment of the impacts with a complete scientific analysis followed by the reissuance of this PEIS. Consistent with The Wildlife Society’s Position Statement regarding energy development and wildlife, we encourage you to work directly with wildlife professionals to develop a project that will maintain, improve, or enhance native wildlife populations, their habitats, and connectivity.

Please direct questions or requests for additional information regarding The Western Section or our expertise relating to the California Offshore Wind Programmatic Environmental Impact Statement to The Western Section Conservation Affairs Committee at the letterhead address.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Fields".

Lisa Fields, Chair  
Conservation Affairs Committee  
Western Section of The Wildlife Society