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December 15, 2016

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RFI 3396 Comments
New York State Energy Research and Development Authority
17 Columbia Circle
Albany, New York 12203-6399

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Re: Comments of Audubon New York on RFI 3396:
Metocean Campaign for the Proposed New York Wind Energy Area

Ross Whaley
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Dear Mr. Lampman and NYSERDA:

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Audubon New York is the state's leading voice for the conservation and protection of natural resources for birds. Integrating science, conservation, policy and education, Audubon's mission is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitat for the benefit of humanity and the earth's biological diversity. With 50,000 members and 27 affiliated chapters state-wide, Audubon New York oversees seven sanctuaries and centers, from Long Island to western New York, and protects priority habitats, including more than 130 Important Bird Areas identified as critical for the conservation of birds.

With this letter, I am forwarding Audubon New York's written comments on NYSERDA's RFI 3396 entitled, "Metocean Campaign for the Proposed New York Wind Energy Area." As more fully detailed in the attached comments, Audubon New York urges the NYSERDA to take full advantage of the opportunity presented by the metocean data collection effort to gather new and useful data on birds in the proposed New York Wind Energy Area.

Any future offshore wind development must be preceded by a robust and thorough assessment of potential impacts on birds and Audubon New York looks forward to working with NYSERDA to ensure that such an assessment is accomplished in the coming months and years. We thank you for the opportunity to comment on this RFI and look forward to continued engagement as additional steps are undertaken by NYSERDA to assess potential impacts on birds and ways to avoid or minimize those impacts.

Should you have any questions regarding these comments, please do not hesitate to call me at (518) 869-9731 or ecrotty@audubon.org.

Sincerely,



Erin M. Crotty
Executive Director, Audubon New York
Vice President, National Audubon Society

Erin M. Crotty
Executive Director

Constantine Sidamon-Eristoff
Founding Chairman

**COMMENTS OF AUDUBON NEW YORK ON RFI 3396:
METOCEAN CAMPAIGN FOR THE PROPOSED NEW YORK WIND ENERGY AREA**

December 15, 2016

Audubon New York is pleased to respond to NYSERDA's RFI 3396 entitled, "Metocean Campaign for the Proposed New York Wind Energy Area." Audubon urges NYSERDA to take full advantage of the opportunity presented by the proposed floating LiDAR campaign to gather new and useful data on birds in the New York Wind Energy Area (NYWEA) at the same time wind resource and other metocean data are collected. We provide specific comments on the Draft Metocean Plan ("Draft MOP") below.

Audubon supports clean, renewable electricity generation as a central part of any strategy to reduce greenhouse gas emissions and fight climate change. Audubon's scientists have determined that climate change is the greatest threat to birds; our peer-reviewed research shows that 314 species – roughly half of all North American bird species – are threatened with the loss of at least 50% of their habitat by 2080. Audubon's climate initiative has two key elements: protecting the places birds need now and in a warmer world and advocating for reductions in greenhouse gas emissions for all sources.

The NYWEA is an area that many birds species are known to migrate through and use as stopover habitat on their journey to their summer breeding habitat and wintering habitat within the Long Island ecosystem and elsewhere in New York. NYSERDA's ReMote (Remote Marine and Onshore Technology) surveys are demonstrating the importance of the NYWEA to migrating birds and other wildlife. The Long Island ecosystem has thirty-one Important Bird Areas (IBAs), nine of which are of global significance (as depicted in the map below). A site is identified as an IBA if it supports significant populations of at-risk species, assemblages of species for which New York has long-term conservation responsibility, or large concentrations of birds. IBAs provide essential habitat for breeding, wintering, and/or migrating birds and globally significant IBAs are the highest priority sites.

Where renewable energy is sited matters and any offshore wind development must fully consider potential impacts to natural ecosystems and wildlife, including birds. In order to avoid adverse impacts, a robust and credible assessment of baseline conditions and potential impacts to birds must be undertaken in the NYWEA and the surrounding areas. Such an assessment will require the gathering of new baseline information across a wide area over a significant period of time.

Audubon New York looks forward to working with NYSERDA and other interested parties to ensure that any development in the NYWEA takes place only after baseline conditions and the potential impacts to birds are fully understood and steps are taken to avoid impacts in the siting, construction and operation of any offshore wind development. As a pioneer in this area, New York can demonstrate to other states and wind developers how offshore wind projects can be developed responsibly while avoiding adverse impacts to birds.

Specific Comments on the Draft MetOcean Plan

RFI 3396 is focused on a proposal for gathering wind resource and related data to demonstrate the economic potential for generating electricity in the NYWEA. NYSERDA recognizes in the RFI and the Draft MOP that it may be cost-effective to gather wildlife data at the same time metocean data are gathered. Audubon New York strongly supports and recommends that the RFP expressly include the collection of wildlife and bird data.

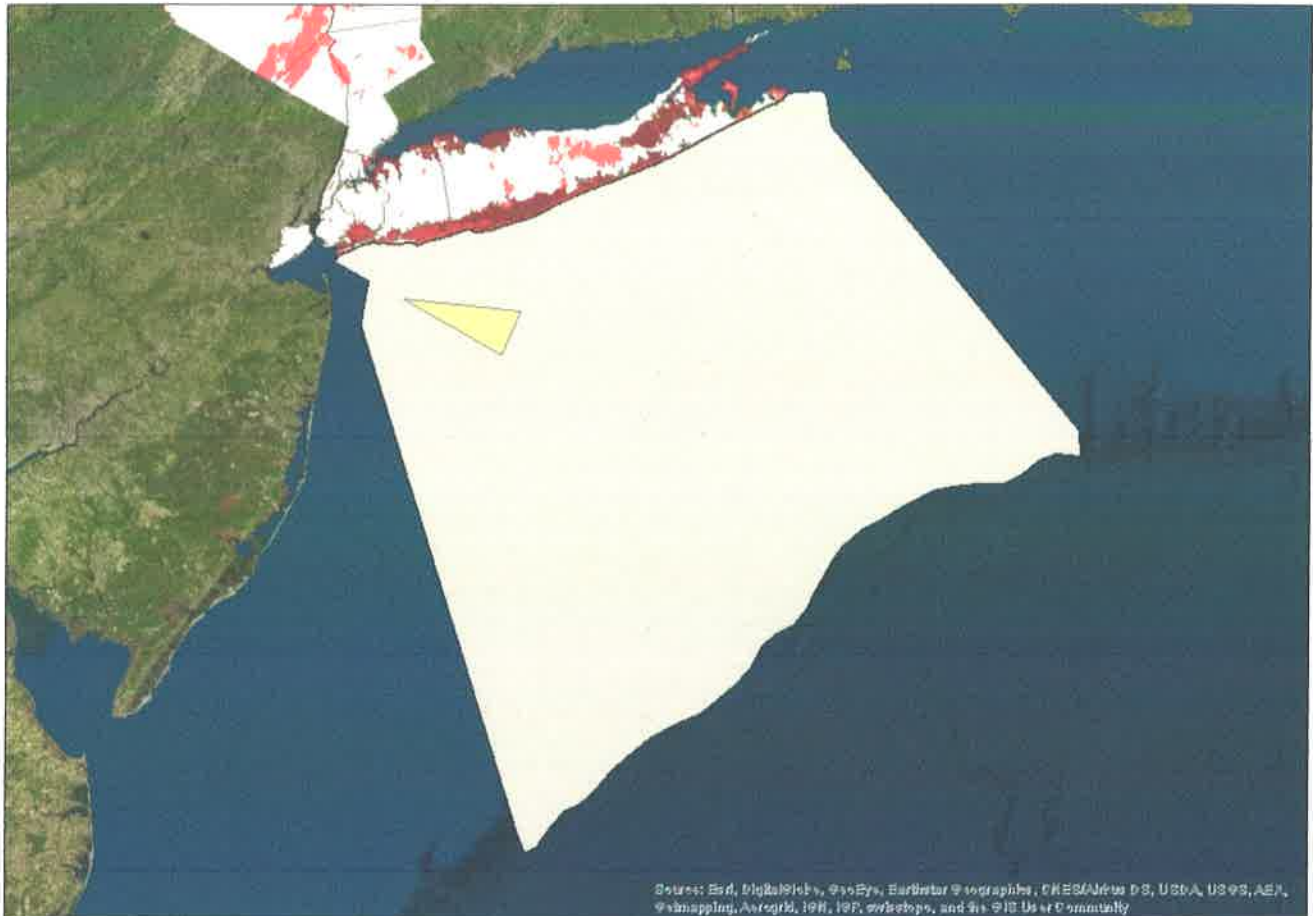
1. Collection of Bird Information as Part of the MOP. Section 2 of the Draft MOP proposes the requirements and recommendations for the floating LiDAR supplier and the data management and analysis contractor. Audubon New York strongly recommends that NYSERDA make it a requirement that the LiDAR supplier also incorporate collection of data regarding bird activity in the area. Similarly, the data management and analysis contractor should be required to store and process the bird monitoring data. In other words, the collection and storage of bird and other wildlife data should be a required part of the RFP, not an optional element. While the collection of bird data alongside metocean data will not substitute for high quality, comprehensive bird surveys, collecting bird data may increase knowledge of baseline conditions and contribute to subsequent high quality bird baseline and impacts assessments.

2. Geographic Scope. Section 4 of the Draft MOP details the proposed location of the two proposed floating LiDAR systems, indicating that the proposed deployment will cover 92% of the buildable area within the NYWEA for purposes of collecting metocean data. The Draft MOP does not indicate what area of coverage could be expected of bird acoustic detectors or any other bird-relevant monitors deployed in connection with the LiDAR systems. Collection of bird baseline data presents a challenge in terms of coverage of monitoring systems because bird movements can vary across seasons and geographic areas, potentially limiting the representative value of data collected in a limited geographic area and time period. In general, wider coverage over a longer time period is better than more limited coverage.

3. Timing and Duration. Section 5 of the Draft MOP details the proposed duration of the deployment of the LiDAR systems. In deciding on the timing and total duration of the LiDAR deployment, NYSERDA should require respondents to the RFP to factor in the optimal timing and duration for gathering bird-related data. For example, deployment of bird monitors for 24 months—two full years' worth of seasons—may provide much more value than 18 months that does not fully capture two of each season. Also, any monitoring that is done should target the time of day and seasons when birds are potentially using the area, e.g., nocturnal migrants at night and waterbirds during the day.

4. Type of Monitoring. The Draft MOP references passive acoustic monitoring of birds as one possible way to gather data on birds. In addition to acoustic monitoring, NYSERDA should investigate, and require RFP respondents to examine and consider incorporating NEXRAD mobile radar units as well as infrared thermal imaging to detect birds in the area during times of low visibility and nighttime conditions. Some bird species do not make sounds when they migrate, making acoustic monitoring alone insufficient.

Long Island Important Bird Areas (IBAs) in red,
approximation of NY Wind Energy Area in yellow,
and Offshore Study Area in gray



 Audubon NEW YORK