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Comment Received From: Erica Brand
Submitted On: 1/10/2017
Docket Number: 15-RETI-02

Conservation Organizations' comments on RETI 2.0 Plenary Report

Additional submitted attachment is included below.

January 10, 2017

Dockets Unit
California Energy Commission
Docket No. 15-RETI-02
1516 Ninth Street, MS-4
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RE: Comments to Renewable Energy Transmission Initiative (RETI) 2.0 Plenary Report – Public Review Draft

Docket Number: 15-RETI-02

Dear RETI 2.0 Leadership Team:

Our organizations strongly support the objective of the Renewable Energy Transmission Initiative (RETI) 2.0 to explore new transmission to meet the needs of an increasingly carbon free California economy. We appreciate the progress that RETI 2.0 made in aggregating existing environmental, transmission, and renewable resource data from across multiple studies, regulatory planning processes, and regulatory proceedings. This initiative has provided valuable insights that have been captured in the RETI 2.0 Plenary Report public review draft (Plenary Report). As requested at the January 3, 2017 workshop, we are writing to provide our feedback on the environmental recommendations. While this letter is intentionally limited in scope, we continue to have unaddressed concerns with other aspects of the RETI 2.0 process, as highlighted in our letter submitted on November 14, 2016 (Attachment C).

1. **Revise the description of the work and accomplishments of the environmental track of the Environmental and Land Use Technical Group (ELUTG) in the Plenary Report to avoid confusion about what the ELUTG accomplished.**

The Plenary Report's description of the work and accomplishments of the environmental track of the ELUTG must be amended in the final report.

The primary work of the environmental track of the ELUTG consisted of identifying the spatial data relevant to the RETI 2.0 planning exercise, evaluating data completeness, identifying data gaps, and determining next steps to fill data gaps and build on existing data[1]. These primary objectives are an important pillar of the RETI 2.0 process and have value in supporting statewide greenhouse gas reduction and renewable energy goals.

Our concern is that the description of the environmental track of the ELUTG in the Plenary Report, as currently written, could be interpreted to include work and accomplishments that extend far beyond the scope of what was completed during the RETI 2.0 process.

Specifically, the work and accomplishments of the ELUTG are **at risk** of being construed as an *assessment* of the environmental impacts of developing and delivering renewable energy from different areas[2]. The potential impacts and "implications" of generation development and transmission mitigation options[3] were not analyzed by the ELUTG.

The use of the word "assessment" implies that there was an analysis of an action or proposal (e.g., a hypothetical study range of renewable resources, a hypothetical transmission mitigation option) against the environmental data that was assembled. The subsequent use of the word "implications" implies that a conclusion was drawn about the

[1] Flint, Scott, Eli Harland, Misa Milliron, Gabriel Roark. 2016. *Environmental and Land Use Information to Support the Renewable Energy Transmission Initiative 2.0 Process.* California Energy Commission. Publication Number: CEC-700-2016-007. Page 2.
[2] Page 2 of the RETI 2.0 Plenary Report states that RETI 2.0 is: "An assessment of…e**nvironmental implications** and options for developing and delivering renewable energy from different areas." (emphasis added)
[3] "Mitigation options include new transmission, advanced technologies and non-wire alternatives, and operational efficiencies." California Natural Resources Agency. (2016). Page 39.

environmental consequences of the action or proposal (e.g., a hypothetical study range of renewable resources, a hypothetical transmission mitigation option). This was not the case.

What the environmental track of the ELUTG *did do* is recommend environmental and land use spatial data, both statewide and regional data relevant to the Transmission Assessment Focus Areas (TAFAs), that is suitable for consideration during high-level generation and transmission planning. These data helped provide context about the environmental setting within the TAFAs, but as noted in the Plenary Report, these data do not provide a comprehensive accounting[4] of environmental and land use considerations, resources, or issues. Additionally, while these data have value for planning purposes they are not intended to substitute for more detailed California Environmental Quality Act or National Environmental Policy Act review.

In fact, the descriptions of the ELUTG objectives in the Plenary Report differ from the description in the final ELUTG Report. Furthermore, the description of the ELUTG objectives varies within the Plenary Report, with multiple different characterizations of the work that was completed[5]. To resolve, we recommend the RETI 2.0 team adopt the redline edits in Attachment A to this letter, which aim to make the description of the ELUTG consistent across reports.

These edits are essential. The language used in the Plenary Report as currently drafted risks that the findings may be interpreted to mean that the geographic areas (e.g., TAFAs) and transmission mitigation options identified have completed an "environmental assessment" that has resulted in identification of environmental and land use "implications." There is also a risk that these TAFAs and transmission mitigation options may be viewed as sanctioned or pre-approved for generation and transmission siting. This is not the case and should be clearly stated.

[4] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* Appendix A, TAFAs, page A-1.
[5] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* See pages 1, 2, 3, 10, 29, and 54.

We appreciate that the RETI 2.0 leadership team has actively sought to bring clarity to what RETI 2.0 *is* and *is not*, as clearly outlined in the Plenary Report[6] and webinar. It is important that this clarity extend to the role, work, and accomplishments of the ELUTG. Therefore, we recommend that RETI 2.0 leadership adopt the redline edits in Attachment A to mitigate the aforementioned risks.

2. **We appreciate the Plenary Report's acknowledgement of local, state, and federal planning processes, and the clear recognition of the importance of environmental data in energy planning.**

We were pleased to see that the TAFA narratives in the Plenary Report, Appendix A incorporated the results of local, state, and federal planning processes[7]. The inclusion of these processes is important considering the RETI 2.0 process did not conduct new land use or environmental analysis. We found figures A-1, A-2, and A-3 to be helpful in visualizing the relationships between these planning processes and renewable resource data considered by the Plenary Group.

Furthermore, we appreciate that the Plenary Report has highlighted the important co-benefits of geothermal development in the Salton Sea[8]. Not only does geothermal at the Salton Sea serve climate and environmental benefits, this area has been identified for renewable energy development in federal, state and local planning processes. Moreover, geothermal energy resources help provide the needed resource portfolio balance the state is seeking.

Lastly, we support the environmental data recommendations that were identified in the Plenary Report[9]. We agree that access to environmental data, models, and the

[6] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* See Purpose Section, pg. 1.
[7] These processes include the Least Conflict Lands for solar energy identified in the Solar in the San Joaquin Valley process; the Development Focus Areas designated by the Bureau of Land Management's DRECP Phase I Land Use Plan Amendment; and the renewable energy zones and overlays established in local government planning processes
[8] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* Page 24.
[9] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* Page 55.

Environmental Report Writer[10] should be kept available online for use by agencies, stakeholders, and the public. Likewise, we agree that the data sets should be kept up to date. Lastly, we are encouraged by the overview and description of the Environmental Report Writer[11]. Since our organizations' experience and understanding of the Environmental Report Writer is limited only to a description in this report, we must reserve any opinion about its use and utility to a time after which there has been further explanation and demonstration of this tool. However, at a minimum, we do agree with the recommendation that agencies and stakeholders should work together on further development of that tool.

3. Specific improvements needed for environmental and land-use data.

As directed by the review questions for commenters, as follows we present our feedback on the completeness and accuracy of the environmental and land-use data.

The Plenary Report's descriptions of the North of Kramer area within the Victorville/Barstow TAFA must document the current land use and regulatory uncertainty associated with the Bureau of Land Management's Desert Renewable Energy Conservation Plan (DRECP) Development Focus Area (DFA) north of Kramer ("North of Kramer DFA"). This area is under a 5-year moratorium on any renewable energy development, or until San Bernardino and Kern County update their general plans for conservation and renewable energy, and the California Department of Fish and Wildlife issues a final Mohave ground squirrel conservation strategy. The description of hypothetical development potential within this area is misleading without recognizing the high uncertainty about whether or not the North of Kramer DFA will exist in five years. Additional information on this important condition can be found in Attachment B to this letter. To make this distinction clear, we recommend a change of the color of the North of Kramer DFA in Figure A-2 of the Plenary Report, Appendix A.

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[10] Flint, Scott, Eli Harland, Misa Milliron, Gabriel Roark. 2016. *Environmental and Land Use Information to Support the Renewable Energy Transmission Initiative 2.0 Process.* California Energy Commission. Publication Number: CEC-700-2016-007. Page 14.

[11] Flint, Scott, Eli Harland, Misa Milliron, Gabriel Roark. 2016. *Environmental and Land Use Information to Support the Renewable Energy Transmission Initiative 2.0 Process.* California Energy Commission. Publication Number: CEC-700-2016-007. Page 14.

The Plenary Report notes that: "Many of the highest-quality wind resources in California have already been developed or are constrained by environmental and permitting barriers"[12]. It is important to note that there are significant constraints for wind development in the California deserts specifically due to the distribution of military installations. The Department of Defense has invested considerable resources in working with renewable energy developers and stakeholders to address siting concerns with wind and solar projects wherever possible. However significant constraints remain in the deserts with regard to wind technology in particular.

Please see Attachment B of this letter for a full account of the recommended edits to improve the completeness and accuracy of the environmental and land-use data employed in the Plenary Report, Appendix A – TAFAs.

Lastly, we incorporate by reference our comments submitted on November 14, 2016 (Attachment C). The attached letter reflects comments made through the RETI 2.0 process, which continue to be unaddressed in key part.

4. Conclusion

Local, state, and federal agencies have made tremendous progress in planning to balance the siting of renewable energy generation with conservation. The important challenge ahead is aligning transmission planning with land-use planning processes to meet California's ambitious renewable energy goals in a timely and environmentally responsible manner. We appreciate the progress that RETI 2.0 has made in moving this dialogue forward and the opportunity to provide our feedback.

[12] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* Page 24.

Respectfully submitted,

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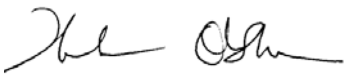

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Attachment A

Redline Edits to ELUTG description in Plenary Report

We strongly urge the RETI 2.0 leadership to make the following redline edits to the description of the Environmental and Land Use Technical Group (ELUTG) in the Plenary Report.

ELUTG description, edit #1 -

Current text, page 1, bullet 2:

- "RETI 2.0 is: An assessment of transmission and environmental implications and options for developing and delivering renewable energy from different areas." [13]

Recommended revision, page 1, bullet 2:

- RETI 2.0 is: "An assessment of transmission ~~and environmental~~ implications and options for developing and delivering renewable energy from different areas."
- Add another bullet: RETI 2.0 is: "An assemblage of spatial environmental and land-use data relevant to renewable energy and transmission planning."

ELUTG description, edit #2 -

Current text, Page 2:

- "Second stage: The three RETI 2.0 input groups reviewed TAFAs and identified transmission, environmental, land-use, and policy implications of developing and transmitting a hypothetical amount of additional renewable energy from each TAFA."[14]

Recommended revision, Page 2:

- "Second stage: The three RETI 2.0 input groups reviewed TAFAs and identified transmission, ~~environmental, land-use,~~ and policy implications of developing and transmitting a hypothetical amount of additional renewable energy from each TAFA. The ELUTG recommended spatial data relevant to renewable energy and transmission planning, evaluated data completeness, and identified data gaps."

[13] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* Page 1.
[14] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* Page 2.

ELUTG description, edit #3 -

Current text, Page 3:

- "The Environmental and Land Use Technical Group (ELUTG)…was an open stakeholder forum charged with collecting and assessing existing environmental and land-use planning information, including consultation with Native American tribes, to evaluate the implications of renewable energy and transmission development in the different TAFAs."[15]

Recommended revision, Page 3:

- "The Environmental and Land Use Technical Group (ELUTG)…was an open stakeholder forum charged with collecting and assessing existing environmental and land-use planning information relevant to renewable energy and transmission planning, including consultation with Native American tribes~~, to evaluate the implications of renewable energy and transmission development in the different TAFAs~~."

ELUTG description, edit #4 -

Current text, page 29:

- "The ELUTG was charged with providing a broad assessment of the feasibility of developing the hypothetical renewable resource range in each area, and a high-level overview of the environmental and land-use issues that may need to be addressed by such development and the conceptual transmission mitigation[16] identified by the TTG."[17]

Recommended revision, Page 29:

- "The ELUTG was charged with ~~providing a broad assessment of the feasibility of developing the hypothetical renewable resource range in each area, and a high-level overview of the environmental and land-use issues that may need to be addressed by such development and the conceptual transmission mitigation identified by the TTG~~ recommending spatial environmental and land-use data relevant to renewable energy and transmission planning, evaluating data completeness, and identifying data gaps."

[15] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* Page 3.
[16] Mitigation options include new transmission, advanced technologies and non-wire alternatives, and operational efficiencies. California Natural Resources Agency. (2016). Page 39.
[17] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* Page 29

ELUTG description, edit #5 -

Current text, page 54:

- "The main goal for the ELUTG was to identify and **recommend how** the data collected in the RETI 2.0 process **should best be used** to examine the environmental implications for areas of potential high-value renewable energy resources and potential new transmission corridors."[18] (**emphasis added**)

Recommended revision, page 54:

- "The main goal for the ELUTG was to identify and recommend how the data collected in the RETI 2.0 process should best be used to ~~examine~~ describe the environmental ~~implications~~ context for the Transmission Assessment Focus Areas ~~areas of potential high-value renewable energy resources and potential new transmission corridors~~."

[18] California Natural Resources Agency. 2016. *Renewable Energy Transmission Initiative 2.0 Plenary Report Public Review Draft.* Page 54.

Attachment B

Feedback on the accuracy and completeness of environmental and land-use data in the RETI 2.0 Plenary Report, Appendix A – Transmission Assessment Focus Areas

RETI 2.0 Plenary Report, Appendix A includes environmental and land use information for each of the Transmission Assessment Focus Areas (TAFAs) in California. Attachment B of this letter focuses on the TAFAs within the Desert Renewable Energy Conservation Plan (DRECP) area which has been the subject of detailed resource inventory and planning for both renewable energy development, including transmission, and conservation since 2009. The Bureau of Land Management finalized its amendments to the California Desert Conservation Area Plan for the DRECP by designating Development Focus Areas (DFAs) and new conservation lands in September 2016. In addition, the counties of Inyo, Los Angeles and Imperial have adopted renewable energy elements to their general plans, and two additional counties, San Bernardino and Riverside, are expected to finalize their renewable energy elements in the near future.

Our comments below identify key issues regarding land use and constraints in the Tehachapi, Victorville-Barstow, Tehachapi, Riverside East and Imperial Valley TAFAs that will need to be resolved before the RETI 2.0 draft report can be finalized. The key issues are as follows, according to TAFA.

1. Northern California TAFAs: Considering the absence of advanced planning for renewable energy and conservation in the Northern California TAFAs (Lassen-Round Mountain, Sacramento River Valley and Solano), we believe it is premature for RETI 2.0 to address hypothetical renewable energy generation and transmission needs for these areas.

2. TAFAs in the DRECP area in general: In December 2016 the DRECP agencies, including the CEC, released the Biological Conservation Framework which identifies lands, both federal and private, considered essential to meet biological resources goals and objectives of the DRECP. The framework is also considered a key source of information to be used by local agencies as they develop and adopt their conservation elements associated with Phase 2 of the DRECP covering private lands. The framework is considered by the California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) to be a conservation framework necessary for local agencies to develop

conservation plans that meet the standards for California Natural Communities Conservation Plans, and federal Habitat Conservation Plans. Such plans are necessary for applicants to obtain incidental take permits for listed species under both state and federal law. This framework is a key document to be used by local agencies in preparing their renewable energy and conservation elements to their general plans.

The RETI 2.0 Plenary Report and Appendix A should account for potential additional constraints on renewable energy and transmission project development due to the Biological Conservation Framework, especially in TAFAs that include lands located within the Owens Valley, Indian Wells Valley, eastern slope of the Sierra Nevada and Tehachapi Mountains, and Antelope Valley. A map of the Biological Conservation Framework Lands is attached. The Plenary Report must be updated to include the Biological Conservation Framework.

3. Tehachapi TAFA: BLM designated an 18,000-acre Wildlife Allocation area within the Tehachapi TAFA in 2016 and adopted various Conservation Management Actions (CMAs) that are intended to provide an appropriate level of protection for biological resources, both plants and animals. As per CMA WILD-LANDS-1, renewable energy activities and related ancillary facilities are not allowed. In addition, it retained the existing Desert Tortoise Research Natural Area as an Area of Critical Environmental Concern (ACEC) which was formally designated in 1980. Renewable energy development is prohibited within this ACEC. A similar ACEC designated for conservation of the desert tortoise and its habitat includes public lands in the Fremont Valley and Rand Mountains. Renewable energy development is prohibited here as well. Public lands within the Indian Wells Valley to the north include extensive conservation lands comprised of both ACEC and California Desert National Conservation Lands (CDNCL). Both designations prohibit renewable energy development, and new transmission facilities are allowed in CDNCL but only within designated utility corridors.

ACEC and CDNCL lands also have a maximum allowable ground disturbance limit ranging from 0.1 to 1.0 percent of the acreage within the conservation unit. Such limitations will apply to any new transmission facilities, including facility upgrades. However, in calculating ground disturbance, BLM will also include all existing disturbance in determining the remaining allowable disturbance. Although BLM considers that most

conservation units have not reached the disturbance limits, there are some that are near or have been exceeded.

There are extensive Biological Conservation Framework lands in the TAFA including the Owens Valley, Indian Wells Valley, Antelope Valley, eastern slope of the Tehachapi Mountains, northern slope of the San Gabriel Mountains and extensive areas east of California City.

4. Victorville-Barstow: The RETI 2.0 Plenary Report identifies a hypothetical scenario of 4500 MW of solar and 500 MW of wind energy development in this TAFA, but also states that reaching such levels would be "challenging" due to the extent of sensitive resources and the local agency preference for community scale solar projects only. San Bernardino County tentatively supports a limited number of DFAs on public land near Trona, north of Kramer Junction, Hinkley and El Mirage, and on Variance Process Lands near Amboy.

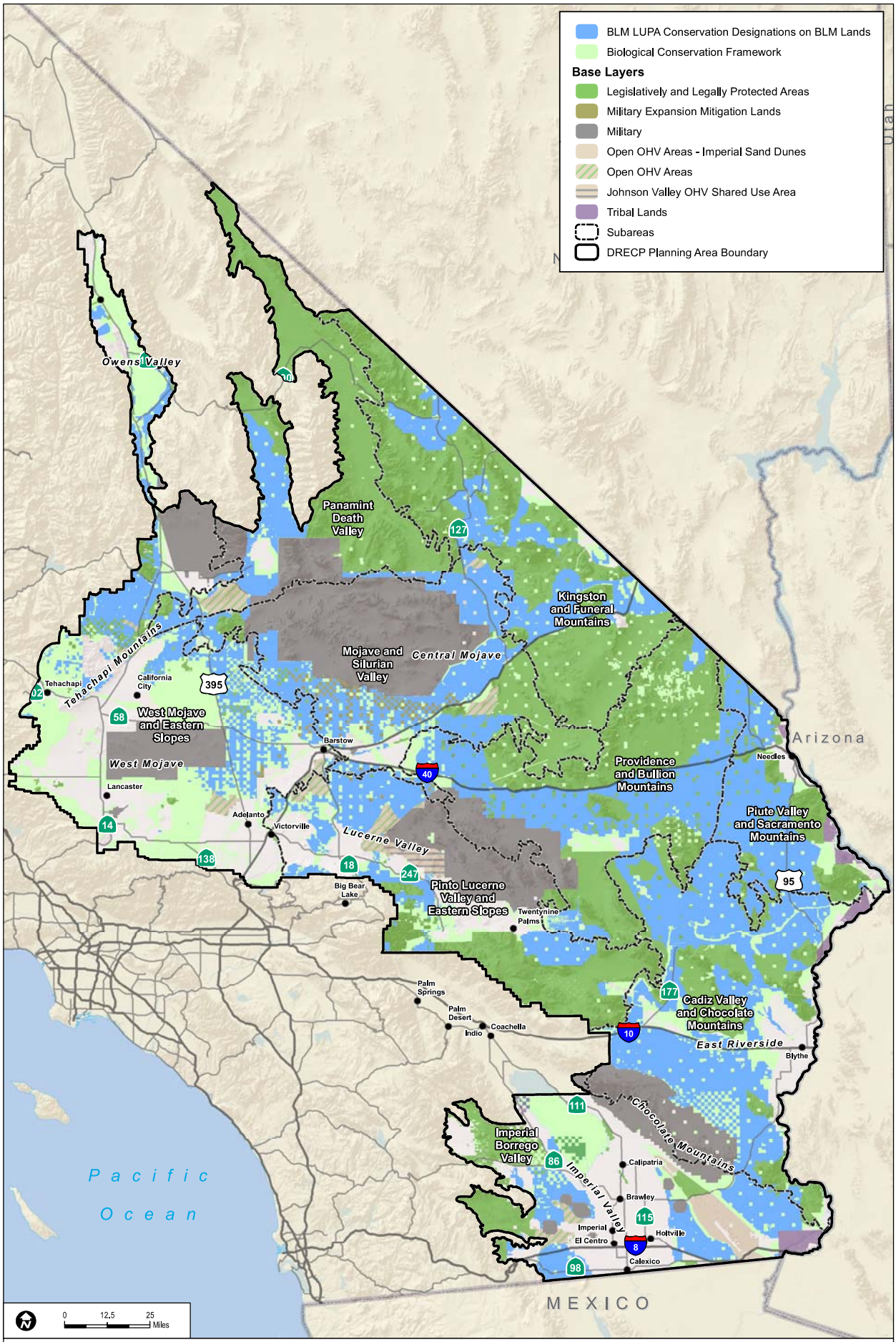
The main issue with this TAFA is the 5-year moratorium on any renewable energy development within the DFA north of Kramer Junction, or alternatively until such a time as Kern County and San Bernardino County finalizes their updates to their general plans that will specify how interspersed private lands will be zoned for Mohave ground squirrel conservation and what private lands will be available for renewable energy development, and the California Department of Fish and Wildlife (CDFW) finalizes its Mohave ground squirrel conservation strategy which will consider all lands within the range of the species including this DFA. In December 2016 the DRECP agencies released the Biological Conservation Framework which identifies lands, both federal and private, considered essential to meet biological resources goals and objectives. This framework is considered a key document to be used by local agencies in preparing their renewable energy and conservation elements to their general plans. All lands within the DFA north of Kramer are included in the Biological Conservation Framework lands, and were included specifically for the conservation of the Mohave ground squirrel.

Appendix A identifies two wind resource areas in the vicinity of Barstow, with a hypothetical generation of 500 MW. We believe this is unrealistic due to military conflicts, and impacts to golden eagles, prairie falcons and migratory birds in general in the wind resource area east of Barstow adjacent to the western portion of the Cady Mountains and the eastern portion of the Newberry Mountains.

Biological Conservation Framework lands overlap large areas of the Victorville-Barstow TAFA, potentially imposing future constraints on renewable energy development.

5. Riverside East TAFA: The RETI 2.0 Plenary Report identifies that 500 to 1000 MW generated from wind energy projects could conceptually be developed in the TAFA, but that such development would be prohibited on the known areas of interest because they overlap with BLM's designated ACECs in the area where renewable energy generation projects are prohibited. In addition, although BLM identified potential wind energy generation in the Riverside East DFA up to 1000 MW, the impact to migratory birds associated with the Colorado River flyway would preclude such development. We recommend that wind energy in this TAFA be dismissed in total due to land use constraints and impacts to migratory birds.

6. Imperial Valley TAFA: Since there are no public land DFAs or Imperial County private lands located within areas identified as having economic wind energy resources, we recommend that the RETI 2.0 Plenary Report dismiss the feasibility of wind energy generation in this TAFA. The wind resource areas identified for the Imperial Valley TAFA is located in an area adjacent to designated wilderness and within an ACEC, as well as located near the Colorado River, a major flyway for migratory birds. Given these designations and potential impact issues, we recommend that wind energy development be removed from the hypothetical development scenario.



Sources: ESRI (2015); CEC (2013); BLM (2015); CDFW (2013); USFWS (2013)

FIGURE 2

Biological Conservation Framework Map with BLM DRECP LUPA Conservation Designations

Attachment C

(see next page)

November 14, 2016

Electronic Mail (with hard copy to follow)

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Dear RETI 2.0 Leadership Team:

Our organizations strongly support the objective of the RETI 2.0 initiative to explore new transmission to meet the needs of an increasingly carbon free California economy. We commend you on the significant progress that RETI 2.0 has made in aggregating important information from existing studies and multiple regulatory planning processes. For the first time, data from across studies and proceedings has been brought together in one forum for exploration. This exercise has provided valuable insights and has also raised important questions that should be resolved in the forthcoming RETI 2.0 report.

Accordingly, our organizations provide the following recommendations for that report.

1. **Need projections should align with California climate policy.**

The need projections identified in RETI 2.0 must be consistent with California climate policy, including SB350. Although the California Air Resources Board (CARB) is still determining the energy sector reductions necessary to meet the SB 350 GHG goals, the amount of hypothetical resource under consideration by RETI 2.0 (40,000 MW) is likely many times larger than what is needed, and indeed, is many times larger than the most recent outputs from the Public Utilities Commission (CPUC)'s Renewables Portfolio Standard (RPS) Calculator. Rather than using the most recent state data, RETI 2.0 uses a range of projections from older third-party reports. Notably, these numbers assume the energy efficiency goals in SB 350 do not occur. We recommend RETI 2.0 use the most recent information on renewables need developed by the CPUC.

2. **Geographic areas identified should align with ongoing planning efforts for renewable energy and conservation.**

The RETI 2.0 planning process has defined new Transmission Assessment Focal Areas (TAFAs) and during the July 21st Environmental and Land Use Technical Group (ELUTG) meeting introduced Project Concentration Areas (PCAs)[1] as spatial areas for potential siting of renewable generating facilities to guide the study of transmission and environmental implications by the Transmission Technical Input Group (TTIG) and the ELUTG.

There are inconsistencies between these areas and geographic areas identified in final local, state, or federal planning processes as areas available or not available for renewable energy development. This misalignment is concerning. For example, the TAFA in Los Angeles County encompasses Significant Ecological Areas which are not available for renewable energy generation[2] and PCAs in the San Joaquin Valley are not consistent with the areas identified as "least conflict" in the "Solar and the San Joaquin Valley Identification

[1] July 2016. https://reti.databasin.org/maps/e3616f36144849a9bdc724dc655bc0f9/active. Although the PCAs do not appear to be included in either the TTIG[1] or ELUTG[1] reports, we are concerned about their potential role in RETI.
[2] Ibid, pages 34-35

of Least-Conflict Lands Project" report[3]. In the California desert, a substantial amount of the Desert Renewable Energy Conservation Plan (DRECP) Phase I Development Focus Areas (DFAs) are inexplicably not included in these areas. This is very concerning particularly given the statements by the state and federal agencies that transmission will be aligned to ensure that the DFAs will be usable for future development.

Equally troubling, these areas either envelop or are contiguous to areas that are not available for development.[4] If RETI 2.0 is to inform transmission decision-making, these areas should be consistent with federal and state renewable energy and land use plans. It is essential to align transmission planning with these local, state and federal siting efforts to meet California's ambitious renewable energy goals in a timely and environmentally responsible manner.

We recommend that areas inconsistent with the land use decisions of planning processes or initiatives either be eliminated from the RETI 2.0 report or those inconsistencies be identified and reflected to ensure that there is an accurate accounting of what may or may not be available for development within these areas.

3. RETI 2.0 did not achieve the objective of analyzing land use and environmental implications.

The original objective of the RETI 2.0 ELUTG was to identify land use and environmental opportunities, constraints, and implications to accessing (high-value renewable) resources that need transmission[5]. This analysis was never conducted. Therefore, it is imperative that the forthcoming RETI 2.0 report does not imply that land use and/or environmental analysis was completed.

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[3] May 2016. *A Path Forward: Identifying Least-Conflict Solar PV Development in California's San Joaquin Valley*. Conservation Biology Institute and Center for Law, Energy & the Environment (CLEE), University of California, UC Berkeley School of Law, CA

[4] For example, some PCAs are located on top of existing incorporated cities (e.g., City of Woodland) and some PCAs overlap with conservation areas on public land in which renewable energy development is prohibited (e.g., conservation designations within the DRECP Phase I Land Use Plan Amendment).

[5] Turner, B. (2016) *Plenary Group Meeting on Long-Term Renewable Scenarios and Transmission Assessment Focus Areas, s*lides 3-4. [PowerPoint Presentation].

As follows are four recommendations on themes and findings that the RETI 2.0 report should explore.

First, we appreciate the discussion in the ELUTG report[6] of the development and possible uses of analytical products and tools to improve integration of land use and environmental considerations into electricity planning (e.g. Data Basin and the environmental report writer). We recommend that the forthcoming RETI 2.0 report describe these tools and their uses and the report narrative must clearly state that these tools were not applied in the RETI 2.0 process and therefore did not shape results or outcomes.

Second, we recommend that any TAFA specific narrative in the RETI 2.0 report rely upon the results of local, state, and federal planning processes, as the RETI 2.0 process did not conduct new land use or environmental analysis. Specifically, the San Joaquin TAFA narrative should describe the Least Conflict Lands for solar energy identified in the Solar in the San Joaquin Valley process[7]. The California Desert TAFAs narrative should describe the Development Focus Areas designated by the Bureau of Land Management's DRECP Phase I Land Use Plan Amendment (LUPA)[8], and the renewable energy zones and overlays established in local government planning processes. We recommend that the RETI 2.0 report identify the backbone (bulk system) upgrade implications of interconnecting renewable generation facilities within Development Focus Areas[9], local government

[6] Flint, Scott, Eli Harland, Misa Milliron, Gabriel Roark. 2016. *Environmental and Land Use Information to Support the Renewable Energy Transmission Initiative 2.0 Process.* California Energy Commission. Publication Number: CEC-700-2016-007

[7] May 2016. *A Path Forward: Identifying Least-Conflict Solar PV Development in California's San Joaquin Valley*. Conservation Biology Institute and Center for Law, Energy & the Environment (CLEE), University of California, UC Berkeley School of Law, CA

[8] 2016. Desert Renewable Energy Conservation Plan. *Record of Decision for the Land Use Plan Amendment to the California Desert Conservation Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan*. U.S. Bureau of Land Management.

[9] 2016. Desert Renewable Energy Conservation Plan. *Record of Decision for the Land Use Plan Amendment to the California Desert Conservation Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan*. U.S. Bureau of Land Management.

identified renewable energy development areas[10], and Least-Conflict Lands[11] within the California Deserts TAFAs and San Joaquin Valley TAFA, respectively. (We recognize that upgrades to local level systems will largely depend on the specific locations of future projects.)

Third, we recommend that the next cycle of the California Independent System Operator's (CAISO) Transmission Planning Process (TPP) incorporate the results of final local, state, or federal planning processes into their study, including Development Focus Areas[12], local government identified renewable energy development areas[13], and Least-Conflict Lands[14]. This can be documented as a recommendation or next step in the RETI 2.0 report. We appreciate that the CPUC has moved to incorporate this data into their portfolio generation via the RPS Calculator as these portfolios are an important input into the TPP.

Fourth, the ELUWG report has underscored the importance of including spatial land use data in generation and transmission modeling and planning; we recommend that the RETI 2.0 report explicitly document this finding. We recommend that Data Basin continue to be used as a central platform for aggregating spatial data associated with RETI 2.0.

[10] Inyo County: http://www.inyoplanning.org/projects/documents/Exhibit1CEQAFindings.pdf (See Table 1). LA County: http://file.lacounty.gov/bos/supdocs/95462.pdf. Imperial County: ftp://ftp.co.imperial.ca.us/icpds/eir/cec/final/22Revisions.pdf

[11] May 2016. *A Path Forward: Identifying Least-Conflict Solar PV Development in California's San Joaquin Valley*. Conservation Biology Institute and Center for Law, Energy & the Environment (CLEE), University of California, UC Berkeley School of Law, CA

[12] 2016. Desert Renewable Energy Conservation Plan. *Record of Decision for the Land Use Plan Amendment to the California Desert Conservation Plan, Bishop Resource Management Plan, and Bakersfield Resource Management Plan*. U.S. Bureau of Land Management.

[13] Inyo County: http://www.inyoplanning.org/projects/documents/Exhibit1CEQAFindings.pdf (See Table 1). LA County: http://file.lacounty.gov/bos/supdocs/95462.pdf. Imperial County: ftp://ftp.co.imperial.ca.us/icpds/eir/cec/final/22Revisions.pdf

[14] May 2016. *A Path Forward: Identifying Least-Conflict Solar PV Development in California's San Joaquin Valley*. Conservation Biology Institute and Center for Law, Energy & the Environment (CLEE), University of California, UC Berkeley School of Law, CA

Conclusion

We appreciate the opportunity to participate in the RETI 2.0 planning process and to provide comments on the forthcoming RETI 2.0 report.

Respectfully submitted,

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