

## DOCKETED

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*Comment Received From: Ileene Anderson*

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*Docket Number: 15-RETI-02*

**CBD comments on RETI2 Draft Plenary Report**

*Additional submitted attachment is included below.*



*protecting and restoring natural ecosystems and imperiled species through  
science, education, policy, and environmental law*

***via electronic mail***

January 10, 2017

Dockets Unit  
California Energy Commission  
Docket No. 15-RETI-02  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**RE: Comments to Renewable Energy Transmission Initiative (RETI) 2.0 Plenary Report –  
Public Review Draft Docket Number: 15-RETI-02**

Dear RETI 2.0 Team,

The Center for Biological Diversity (“the Center”) submits the following comments in response to the Renewable Energy Transmission Initiative (RETI 2) Plenary Report public review draft (Plenary Report). The Center is a non-profit public interest conservation organization dedicated to the protection of native species and their habitats through science, policy and environmental law. The Center has over 1 million members and supporters - many of whom live in the western states including California. These comments are submitted on behalf of our members, staff and members of the public with an interest in renewable energy and its appropriate siting.

Global climate change continues to be one of the greatest challenges facing California and the planet and the transition to renewable energy supplies is critical to achieving the reductions in greenhouse gas emissions in California, the nation, and the world. The Center strongly supports renewable energy development as part of the solution to reduce greenhouse gas emissions, and strongly supports an ambitious and increasing renewable portfolio standard (RPS) that includes distributed energy solutions, along with measures to increase energy conservation in every sector. Unfortunately, even with efforts to reduce greenhouse gas emissions, significant changes in habitats will occur because of impacts of climate change caused by past and ongoing greenhouse gas emissions, further threatening already rare and endangered species.

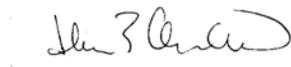
The Center actively participated in the original RETI Environmental Working Group (EWG) and submitted numerous comment letters on that process where we found great improvements needed to be incorporated in order to make the process and outcome useful. By failing to incorporate environmental concerns and cultural concerns from the outset, the final product failed to support smart siting and, rather, steered development to high-impact/high-conflict areas.

Unfortunately, we see the RETI 2 process in the form of Plenary Report going down the same flawed path that the original RETI chose, by not seriously considering the landscape scale environmental constraints for siting transmission and instead focusing on where proposed projects are located. We participated in some of the early Environmental and Land Use Technical Group (ELUTG) meetings for RETI 2.0 but found those meetings failed to use the best available science and disregarded important data sets to inform smart siting. For example, the Plenary Report appears to not incorporate existing data and information about areas proposed for conservation and connectivity under the Desert Renewable Energy Conservation Plan (DRECP) and instead suggests that development may be appropriate in those areas. For the San Joaquin Valley, the report includes areas with previously identified areas of known high conflicts (important agricultural, open space or rangeland areas). Moreover, the process has failed to acknowledge the lack of data and information in areas in northern California. Failing to ensure collection of these key data before planning undermines the ability to provide rational recommendations for transmission planning in the long-term. Because the Plenary Report reflects these serious shortcomings, we question the usefulness of the RETI 2 process and Plenary Report to inform transmission planning and determine where new transmission construction should occur.

In light of the shortcoming of the Plenary Report and the data upon which it is based, we urge the CEC to abandon the current RETI 2 land use path and transition to a more scientifically based and stakeholder driven process. The benefits of engaging in good planning from the outset far outweigh the additional time needed to correct this flawed RETI 2 course.

The Center appreciates this opportunity to comment on this important effort and submits these comments in the hope that they will assist the RETI 2 in developing a useful, defensible and accurate process that protects California's internationally renowned wildlife, habitat, and natural areas while moving forward on this important effort to address the impacts of global climate change. If you have any questions about these comments, please feel free to contact me at 323-654-5943 or [ianderson@biologicaldiversity.org](mailto:ianderson@biologicaldiversity.org).

Sincerely,



Ilene Anderson  
Senior Scientist  
Center for Biological Diversity

cc:

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