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Comment Received From: Armand Gonzales

Submitted On: 1/10/2017

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Comment from the Department of Fish and Wildlife

Additional submitted attachment is included below.



January 10, 2017

Dockets Unit
California Energy Commission
Docket No. 15-RETI-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
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RE: Comments of the California Department of Fish and Game on the Renewable Energy Transmission Initiative (RETI) 2.0 Plenary Report – Public Review Draft, Docket Number: 15-RETI-02

General Comments

The Department of Fish and Wildlife (Department) fully supports Governor Brown's Executive Order B-30-15, which established a new statewide greenhouse gas (GHG) emission reduction target of 40 percent below 1990 levels by the year 2030 to ensure meeting the existing target of 80 percent reduction by 2050.

The Department understands developing the transmission needed to support increasing amounts of renewable resources will be critical to meeting these goals and will require careful planning and coordination. RETI 2.0 was designed as a proactive, statewide, non-regulatory planning forums intended to access and integrate new renewable resources and help meet the state's long-term GHG and renewable energy goals. Specifically, RETI 2.0 was designed to explore renewable generation resources in California and throughout the West to help meet California's long-term energy and GHG reduction goals; identify land use and environmental opportunities and constraints to accessing these resources; build understanding of transmission options for accessing and integrating renewable resources and support for "least regrets" transmission pathways; and inform future planning and regulatory proceedings.

The Department provided data sets to the California Energy Commission through the Environmental, Cultural and Land Use Technical Group (ECLUTG), which were added to the Data Basin RETI 2.0 Gateway, for use with logic models, to help fill data gaps, and to support the data reporting tool. The Department agrees the Data Basis RETI 2.0 Gateway is a useful tool to analyze the areas of high-value renewable energy resources and associated transmission. Such assessments help characterize the potential environmental implications for various regions of the state or to compare potential environmental implications at a high planning level.

Table 2-1, "Summary Characteristics of In-state TAFE's [Transmission Assessment Focus Areas]," which summarizes the environmental and land-use considerations for each of the eight TAFE's described in the Plenary Report, and Appendix A, "Transmission Assessment Focus Area Information" identifies possible environmental, land-use and transmission issues that may be expected if further development occurs for each TAFE. The TAFE's were conceived based on "what-if" questions to assess

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transmission and environmental implications and options for developing and delivering renewable energy from different areas of the state.

Once defined and analyzed for transmission related constraints and opportunities, TAFE's were analyzed by the ECLUTG using the Data Basin RETI 2.0 Gateway to identify environmental implications including biological considerations. Analysis of many of the TAFE's identify possible impacts to conservation lands, areas of critical environmental concern, wetlands and wilderness areas, affecting species such as desert tortoise, golden eagle, Mohave ground squirrel, Mojave fringe-toed lizard, Swainson's hawk, tri-colored blackbird, giant-garter snake, California red-tailed frog, California tiger salamander, Delta smelt, special status plants and vernal pools. This partial list illustrates how post hoc analysis i.e. analysis of environmental impacts resulting from a pre-determined route, adequately produces a list of potential impacts to species and habitats, but fails to avoid sensitive species and habitats in the design.

The Department prefers and recommends, the Data Basin RETI 2.0 Gateway be used in the future a priori, to help define routes that avoid listed species and sensitive habitats. Environmental and biological impacts should be considered early in the planning process, to help guide transmission corridors away from sensitive areas to areas with lower biological value, thereby avoiding "regrets" in the form of impacts to listed species, delays in permitting, and litigation.

The Department appreciates the opportunity to provide comments and looks forward to assisting with future transmission planning. If you have any questions, please contact me at (916) 445-3379 or armand.gonzales@wildlife.ca.gov.

Sincerely,

Armand Gonzales
Special Advisor