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**Comments of Defenders of Wildlife on CEC Workshop held on April 6, 2017
Environmental Information for Energy Planning**

Additional submitted attachment is included below.



To: California Energy Commission
Dockets Office, MS-4
Docket No. 17-IEPR-01
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From: Kim Delfino, Defenders of Wildlife

Date: April 20, 2017

Subject: Comments of Defenders of Wildlife on *CEC Workshop held on April 6, 2017
Environmental Information for Energy Planning*
Docket Number: 17-MISC-03

Defenders of Wildlife (Defenders) respectfully submits these comments on the *April 6, 2017 Workshop on Environmental Information for Energy Planning* to the California Energy Commission.

Defenders, on behalf of our 140,000 members and supporters in California, works towards protection of wildlife, ecosystems, and landscapes while supporting the timely development of renewable energy resources in California. Achieving a low carbon energy future is critical for California – for our economy, our communities and the environment. Achieving this future—and *how* we achieve it—is critical for protecting California’s internationally treasured wildlife, landscapes, productive farmlands, and diverse habitats.

Defenders strongly supports leveraging analytical tools for landscape scale analysis, and facilitating local government efforts for renewable energy planning. We appreciate that the Commission has put so much effort into developing tools to this end.

I. Comments

We offer the following comments on the April 6 workshop, in response to the questions that were posed to stakeholders at the workshop.

How useful are the geospatial planning tools and datasets that were presented in the workshop?

Usefulness comment #1: Public release

The geospatial analysis tools that were presented appear to have usefulness for many potential applications. However, their usefulness will be limited until they become publicly available. The online release is a critical-path milestone which should be achieved to enhance the usefulness of the tools.

We suggest that, if the tools cannot be fully publicly released, perhaps there is a phased approach that could be implemented, for example releasing to a limited audience (a working group or advisory group) for more detailed review, prior to full public release.

We request it be brought out in beta form and stakeholders be provided an opportunity to “test drive” it and provide feedback to facilitate its release.

Usefulness Comment #2: Ground-truthing needed

We recommend that visual inspection of geospatial model results, and calibration against reality, using satellite imagery, should be performed as standard practice where geospatial models are used. This quality assurance step is critical, and should be well-documented for stakeholder review.

Through our participation in working groups for some of the tools, we have identified locations where geospatial model results could be better calibrated against reality, for example predicting landscape intactness, or predicting conservation priority areas. At times it has seemed that landscape features that are visible in satellite imagery have not been incorporated into the model.

We recommend that this visual inspection and model calibration should be included as part of the scope of work in developing the models.

We understand and recognize that some of these models are very broad in geospatial reach, and performing visual inspection of every pixel of satellite imagery for the state of California is a daunting task. There must be a way to break this task down into sub-tasks and leverage additional resources efficiently.

Perhaps an approach like that used by internet company Crowdfunder, enlisting distributed internet users to count cars in satellite imagery, could be applied, to “teach” the models how to recognize buildings, fences, power lines, and roads, and exclude these features from landscape intactness model results? See article on Crowdfunder capabilities online [here](#).¹

The usefulness of the models would be greatly enhanced when the models can be shown to accurately and reliably reflect visible ground conditions.

Usefulness comment #3: Preventing misuse

We note that two approaches to environmental analysis were presented.

- 1) User selects environmental constraints as inputs, then model outputs show suitable locations for development
- 2) User selects the location, then model outputs show environmental conditions in that location

We would like to understand better how the two approaches will be presented. Will both tools be released on the “Databasin Gateway?” Both approaches seem useful, for different audiences and different objectives. However, both also have the potential to be misused. For example, project developers could present tool outputs to a local planning department, expecting to bypass necessary reconnaissance-level biological surveys and permits based on the information in the environmental report writer output document.

It should be made clear (as a watermark or other non-removable marking) that these output reports are not intended to supersede on the ground surveys, required land use and environmental permits, and use of these reports should not be the sole environmental review performed for a site. Use of these products cannot replace full NEPA or CEQA review or other legally required environmental site assessments.

¹ <http://www.marketwired.com/press-release/crowdfunder-releases-next-generation-enterprise-crowdsourcing-platform-optimized-large-1843335.htm>

Usefulness comment #4: Rooftop solar

We appreciated seeing a first glimpse of the DG Environmental Planner, but we could not inspect it closely because it has not yet been publicly released. We support the development of rooftop solar as a beneficial method of deploying clean renewable energy resources with minimal disturbance of sensitive species and habitats. We support the expansion of the rooftop solar geospatial assessment capabilities to more than just one town.

Stakeholder question 2: In what proceedings might these tools be used?

We can envision these geospatial planning tools being used in the following proceedings:

- 1) IEPR Strategic Transmission Investment Plan
- 2) SB350 implementation
- 3) CPUC/CEC IRP modeling
- 4) Procurement approvals pursuant to IRPs
- 5) Local government could use these geospatial planning tools in developing Energy Elements for General Plans and Specific Plans
- 6) Counties that are participating in Phase 2 of DRECP (Kern, LA, San Bernardino)
- 7) Counties that have Community Choice Aggregation
 - a. These geospatial planning tools could be used to inform selection criteria for renewable energy procurement
- 8) Other planning and development activities such as infrastructure planning and development

We would like to emphasize the importance of data quality, in order to ensure beneficial effectiveness in these types of applications.

Additional comment: Long term plan for maintenance and updates

There needs to be a system/plan in place for ongoing maintenance and updates to the geospatial datasets and Databasin platform. We would like to see a regular established schedule of opportunities for parties to continually provide data quality review and additional ground-truthing over time. We expect it will take a long time to get this dataset truly accurate and calibrated for use in the various applications. CBI should leverage public input as much as possible in this long-term plan, as it would be an inefficient use of

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resources for one contractor to perform all of the data quality monitoring and maintenance with limited staff and budget. We recommend investigating models such as that used for the [eBird](#)² dataset, or the [iNaturalist](#)³ platform, as possible example approaches for leveraging more public contributions.

II. Conclusion

We appreciate and commend the Commission for continuing to provide leadership in the important area of landscape scale planning. We encourage the Commission to continue this important work as it will facilitate improved siting and development of energy projects as well as providing additional benefits for other land use planning and siting efforts. We look forward to continued participation in the proceeding.

Sincerely,



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² <http://ebird.org/content/ebird/>

³ <https://www.inaturalist.org/>