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Defenders of Wildlife Comments on Nov 18 2019 SB 100 Technical Workshop

Additional submitted attachment is included below.

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RE: Docket No. 19-SB-100
Comments on the November 18, 2019 SB-100 Technical Workshop

Defenders of Wildlife (Defenders) respectfully submits these comments on the November 18, 2019 SB 100 Technical Workshop (Workshop). Defenders, on behalf of our 279,000 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.

We appreciate the Joint Agencies and staffs' efforts in developing the SB 100 Joint Agency Report and holding the Workshop. Modeling and analyzing what kind of resources technologies is important, but it is essential that where and how these resources and technologies are developed and implemented is considered to protect valued natural resources. SB 100 specifically requires consideration of environmental costs and environmental protection. The bill directed the Joint Agencies and all other state agencies to take … "into full consideration the economic and environmental costs and benefits of renewable energy and zero-carbon resources."[1] The legislation further directed the Joint Agencies to consult with all California balancing authorities to produce a joint report to the Legislature that includes a review of the 100% renewables and zero carbon by 2045 policy … "focused on technologies, forecasts, then-existing transmission, and maintaining safety, environmental and public safety protection, affordability, and system and local reliability."[2]

[1] CA Public Utility Code Section 454.53(b)(2)
[2] CA Public Utility Code Section 454.53(d)(2)(A)

Consideration of land use implications in the development of lands for renewable energy generation and transmission is also consistent with the state policy and required by Senate Bill 1386, which states "[i]tis the policy of the state that the protection and management of natural and working lands is an important strategy in meeting the state's greenhouse gas emissions reduction goals." (emphasis added)

SB 1386 directs "[a]ll state agencies, including, but not limited to, the Natural Resources Agency, the Department of Food and Agriculture, and the California Environmental Protection Agency, and their respective departments, boards, and commissions, [to] consider the policy set forth in this section when revising, adopting, or establishing policies, regulations, expenditures, or grant criteria relating to the protection and management of natural and working lands. State agencies shall implement this requirement in conjunction with the state's other strategies to meet its greenhouse gas emissions reduction goals and with the intent to, among other things, promote the cooperation of owners of natural and working lands.[3] (emphasis added)

Achieving SB 100 goals is not just a matter of identifying how much and what kind of generation needs to be developed and procured. Reaching the goals set forth under SB 100 could result in potentially significant land use impacts and California and the West.[4] How and where renewable energy projects and infrastructure are to be developed will be critical to ensure that securing a 100% renewable energy future occurs with the least amount of conflict, delay and impact on our important natural resources. Thus, successful energy planning requires land use planning.

Significant progress has been made to begin incorporating land use and environmental sensitivities into energy planning with the Desert Renewable Energy Conservation Plan (DRECP),[5] the San Joaquin Least Conflict Study,[6] and the California Energy Infrastructure Planning Analyst (CEIPA)[7] that was created by the Conservation Biology Institute for the California Energy Commission (CEC) to assist with planning energy development throughout the state to improve planning efficiency and to avoid environmental risks based on the best available spatial datasets. The busbar allocation modeling done by the CEC this year for the Integrated Resource Plan (IRP) furthered this work to use environmental sensitivities to better identify realistic allocations for energy generation and transmission.[8]

The SB 100 modeling and analysis should incorporate and build upon CEIPA and the IRP busbar allocation modeling to identify where and how least-conflict energy generation, storage, and transmission can be developed. Environmental screens should be front-loaded in the modeling and

[3] CA Public Resources Code Section 9001.5
[4] https://www.scienceforconservation.org/products/power-of-place
[5] https://www.drecp.org/
[6] https://www.law.berkeley.edu/research/clee/research/climate/solar-pv-in-the-sjv/
[7] http://ceipa.databasin.org/
[8] https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/UtilitiesIndustries/Energy/EnergyPrograms/ElectPowerProcurementGeneration/irp/2018/IRP_Busbar_Mapping-Methodology-2019-10-18.pdf

analysis similar to the CPUC's approach to IRP so that they are the foundation to energy planning rather than an after-thought. The modeling and analysis must use metrics to allow for comparisons of different scenarios to allow for informed consideration by stakeholders, and decisionmakers. The modeling and analysis should also be expanded to explore the introduction of offshore wind into California's energy portfolio and the marine/terrestrial interface needed for development, operations, and transmission.

Because energy planning must involve land use planning, we recommend that the Governor's Office of Planning and Research (OPR) and the California Natural Resources Agency (CNRA) be included in the team developing the modeling and analysis. OPR and CNRA will bring beneficial and necessary land use planning input to bringing SB 100 to life in a sustainable and environmentally responsible manner.

Conclusion

Thank you for the opportunity to provide initial comments on the November 18, 2019 SB 100 Technical Workshop. We look forward to actively participating in the development of the SB 100 Report. Please contact Kim Delfino at (916) 313-5800 or kdelfino@defenders.org or Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,

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