

DOCKETED

Docket Number:	19-SB-100
Project Title:	SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future
TN #:	232340
Document Title:	Defenders of Wildlife Comments - 19-SB-100 Defenders of Wildlife Comments on Feb 24 2020 Inputs-Assumptions Workshop
Description:	N/A
Filer:	System
Organization:	Defenders of Wildlife
Submitter Role:	Public
Submission Date:	3/9/2020 11:43:19 AM
Docketed Date:	3/9/2020

*Comment Received From: Defenders of Wildlife
Submitted On: 3/9/2020
Docket Number: 19-SB-100*

**19-SB-100 Defenders of Wildlife Comments on Feb 24 2020 Inputs -
Assumptions Workshop**

Additional submitted attachment is included below.



California Program Office

980 Ninth Street, Suite 1730 | Sacramento, California 95814 | tel 916.313.5800

www.defenders.org

March 9, 2020

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Electronically filed to the Docket

RE: Docket No. 19-SB-100
Comments on the February 24, 2020, SB-100 Inputs and Assumptions Workshop

Defenders of Wildlife (Defenders) respectfully submits these comments on the February 24, 2020, SB 100 Inputs and Assumptions Workshop (Workshop). Defenders, on behalf of our 279,000 members and supporters in California, works towards the 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 crucial 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 resource technologies is important, and 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)

We reiterate our previous comments – 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]t is 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 must 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 Natural resources (e.g. wildlife, plants, land, and water) and land use must be integrated into the consideration of environmental costs and benefits for the SB 100 Report. Based on Slide #25 of the Staff presentation, the only output of environmental protection in the current modeling effort is GHG emissions.⁵ Consideration of natural resources and lands use as a component of environmental costs and benefits will yield outcomes that identify least-cost/best-fit solutions to siting generation and transmission, provide pathways to benefit disadvantaged communities, and facilitate compliance with the requirements of SB 100 and SB 1386. Smart-from-the-start renewable energy development guides projects to low-value, low-conflict areas and degraded agricultural lands—aiming to avoid or minimize adverse impacts on wildlife, valuable agricultural lands, and high-value resource lands such as vernal pools, foraging habitat, riparian corridors, and transitional biotic zones. This approach has two clear benefits: protecting vital natural resources and speeding up the permitting process for renewable energy projects.

The inclusion of natural resources and land use must be a fundamental component of the environmental inputs and should be incorporated into the first tier of modeling and analysis. Environmental screens should be front-loaded in the modeling and analysis so that they are the foundation of energy planning that identifies appropriate least conflict locations for development as a fundamental output 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.

³ CA Public Resources Code Section 9001.5

⁴ <https://www.scienceforconservation.org/products/power-of-place>

⁵ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=232215&DocumentContentId=6419> 7

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.

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 February 24, 2020, SB 100 Inputs and Assumptions Workshop. We look forward to actively participating in the development of the SB 100 Report. Please contact Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,



Pamela Flick
California Program Director



Kate Kelly
Consultant