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*Comment Received From: Michael Colvin
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Comments of Environmental Defense Fund

Additional submitted attachment is included below.

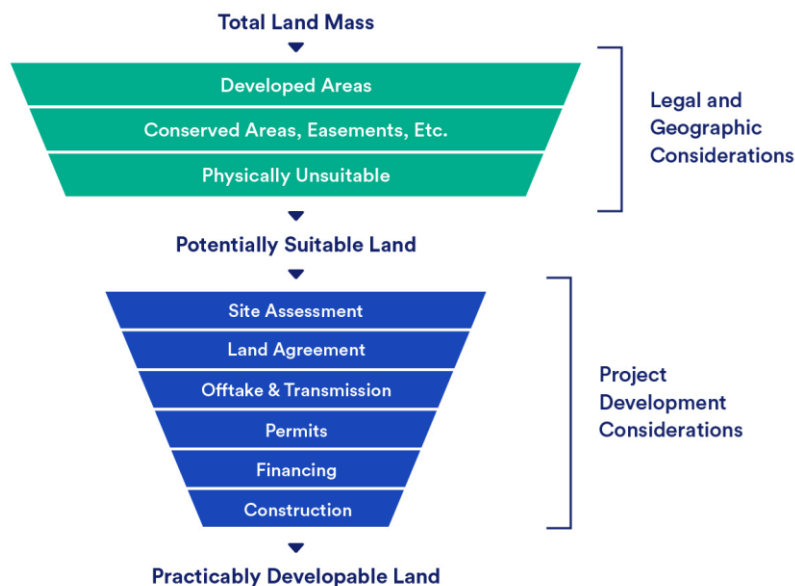
October 25, 2022

California Energy Commission Docket #22-IEPR-02
 Subject: Comments on Land Use Screens Workshop

On behalf of Environmental Defense Fund (EDF), I write to you today in response to the October 10, 2022 workshop on land use screens. EDF appreciates the thoughtful approach that the staff has taken to develop the interactive tool and the broader report.

California will need to utilize geospatial analysis – with particular emphasis on generation resource diversity – as it procures new clean electric generation at an unprecedented rate over the next decade. Clean Air Task Force, with support and partnership from EDF, recently released a report entitled “Growing the Grid: A Plan to Accelerate California's Clean Energy Transition.” A copy of the report is attached to these comments.

In the report, we emphasize that not all suitable land that would be identified by the land use screens can actually be developed. There are a variety of additional factors that will contract the amount of suitable land to developable land, as outlined in the below figure.



EDF suggests that the IEPR both consider this tool of what is suitable and then go the next step and identify what is permissible and developable. This assessment should occur for a variety of generation resource types, since generation resource diversity (including considering the land area it will be situated upon) will be critical for both maintaining reliability and affordability. EDF further suggests that the Energy Commission develop a set of scenarios of different amounts of land availability (a low-, mid- and high-case) to help inform the overall generation build-out portfolio that could occur.

In addition to these steps, EDF suggests that direct community engagement occur at the preliminary stages of this effort. Local community preferences will give incredible insights to understanding the difference between suitable and developable land. The Energy Commission may want to consider block grants to help give high priority local communities the resources they need to do this work.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Colvin", with a long horizontal flourish extending to the right.

Michael Colvin
Director, California Energy Program
Environmental Defense Fund
mcolvin@edf.org | (415) 293-6122

(Attachment enclosed)