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on Draft Land Use Screens Report

Additional submitted attachment is included below.



Via Email to docket@energy.ca.gov

California Energy Commission
Docket Unit, MS-4
Docket No. 22-IEPR-02 – California Planning Library
715 P Street
Sacramento, California 95814-5512

October 31, 2022

**Re: Docket No. 22-IEPR-02 —Comments on Draft Staff Report on Land Use
Screens for Electric System Planning and Mapping**

Dear Energy Commission Members,

These comments are submitted on behalf of the Center for Biological Diversity (“Center”) regarding the Land-Use Screens for Electric System Planning Draft Staff Report and the Process, Methods & Recommendations presented at the workshop on October 10, 2022. The Center supports the goals of utilizing land use screens to steer large, utility scale renewable energy development to areas with the least impacts to environmental resources and other resources.

The Center has several significant concerns with the draft land use screens report and mapping as follows:

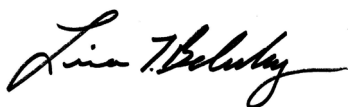
- First, the land use screen process completely ignores the built environment where buildings, parking lots, brownfields and other large land areas that have already been heavily disturbed or type-converted from their natural state are available to support solar energy production at a significant scale and which also require electrical system planning to support this critically important sector of renewable resource development near end users that provides co-benefits including resiliency when paired with storage.
- Second, the screens appear to have missed several key resources and include areas that are not appropriate for large, utility scale renewable development which could steer electrical system planning and prospective developers into inappropriate areas. Other commenters have pointed out several missing layers including lands with conservation easements and scenic areas. Among the other layers that appear to be missing are: designated and proposed critical habitat for several species including the Bi-State sage grouse; and areas of critical environmental concern (ACECs) designated to protect species on Federal public lands. While Appendix D provides some general information about the source of various layers, it appears incomplete, several of the links are not working, and

much of the data is not current. In addition, some of the sources materials are themselves aggregations of data, without access to the full list of layers used for the modeling it is hard to tell what other layers are missing or were possibly improperly weighted.

- Third, the report fails to provide needed transparency about information sources, how the maps were produced, and the screens/layers utilized. By providing only the results in a “blended” model in the report as opposed to providing a map with each layer that can be reviewed and explored, the report does not allow the public or the CEC and CPUC decision makers to see in detail the effects of the choices made by staff in this modeling exercise. For example, while the report discloses that choice of the threshold for inclusion of biodiversity index for the model was lowered from 2.75 to 2.5 (which the report states is a “a slightly more restrictive value of model scores”), and how it impacts “linkage corridors”, it fails to adequately explain the consequences of that choice on other resources or the consequences of other choices that could have been made in the biodiversity index and weighting as an initial matter.
- Fourth, the report should detail the need to coordinate use of the screens and layers with the CEC’s ongoing efforts to integrate non-energy benefits (NEBs) into cost-effectiveness determinations. That work is long overdue and should be leveraged to inform the land use screens (for instance, to indicate areas with the potential to maximize socioeconomic and other benefits of distributed energy resources to disadvantaged communities (DACs) and other Environmental and Social Justice (ESJ) communities) and vice versa (for instance, how land use screen information, such as the location of critical habitat, can inform the determination of NEBs).

Thank you for considering these comments. The Center looks forward to reviewing a revised report on the land use screens for electrical system planning that includes distributed energy and the built environment, utilizes a full suite of available information for the screens that can help steer new development away from areas with sensitive environmental resources including imperiled species and critical habitats and towards maximizing benefits in DACs and other ESJ communities, and provides transparent information to the public and decision makers for review. Please do not hesitate to contact us if you have any questions about these comments.

Sincerely,



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