

DOCKETED

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CalWEA Late-Filed Comments on Land-Use Screens

Additional submitted attachment is included below.



November 10, 2022

California Energy Commission
Docket No. 22-IEPR-02
Docket Office
1516 Ninth Street
Sacramento CA 95814

Submitted Electronically via CEC website to Docket 22-IEPR-02

Re: Late-Filed Comments on Draft Staff Report - Land-Use Screens for Electric System Planning

The California Wind Energy Association (CalWEA) appreciates the opportunities we have had to engage with staff leading up to and following the October 10, 2022, workshop on the October 2022 Draft Staff Report on Land-Use Screens for Electric System Planning (“Staff Draft”). Our discussions have enabled CalWEA to better understand the overall joint-agency process surrounding the land-use screens and constraints on the base layer wind resource data upon which land-use screens are being applied for the purpose of electric system planning. As the latest discussion took some time, we now submit these late-filed written comments for the Commission’s consideration, which reflect the input provided in our discussions with staff.

CalWEA offers the following recommendations on the land-use screening process.

1. Wind resource data at 100 meters above ground level should be used, capturing areas with 5.5 meter/second resources

Staff is applying land-use screens to wind resource maps developed by the CPUC based on the current (2015) edition of National Renewable Energy Laboratory’s “Wind Toolkit.” The Staff Draft indicates (Appendix C, pp. C-1 and D-7) that wind resource data at 80 meters above ground level is being selected for use from NREL’s Toolkit. However, 100-meter data is available from that resource and current technologies allow turbine hub heights of at least that height. The wind resource at 100 meters is stronger and therefore this data will indicate more areas with commercial potential. It is therefore important that 100-meter resource data be used.

Areas with 5.5 meter/second (m/s) resources and above, at 100 meters, should be captured, as developers expect that manufacturers will be bringing turbines onto the market with large blades and relatively small generators that, along with taller towers,

support prospecting in 6 m/s sites today (for installation 3-5 years hence) and in 5.5 m/s sites 5 to 10 years hence (particularly sites with evening production profiles).

2. The Commission should seek to apply the land-use screens to updated NREL resource maps, if possible

The power curves in the 2015 NREL Toolkit are now at least 7 years old, and therefore will significantly under-represent the wind resource areas that can be economically captured with currently available wind technology. CalWEA understands that NREL's updated version of the Toolkit, Wind Toolkit LED, will be publicly available by January 2023, if not late this year. Therefore, if possible, CalWEA recommends that the agencies refresh the base layer wind map using the updated Toolkit before applying the land-use screens to generate the final maps used for electric system planning.¹ If an updated version can be used, CalWEA recommends evaluating wind resources at 125 meters, as well as 100 meters, which may reveal potentially developable resources not captured at 100 m.

3. Cropland screens should not be applied to wind resources

The Staff Draft indicates that between 2.32 and 1.31 million acres of onshore wind resource potential is screened out in part based on a Cropland Index model (pp. 38-39). CalWEA recommends against applying the cropland screen to wind resource areas for several reasons.

First, generally, wind energy is compatible with croplands due to its small terrestrial footprint, and ability to microsite turbines. Generally, just 2%-5% of the land-based project lease area is physically disturbed.² However, because croplands will already have access roads, the disturbance area will be on the low end of this range.

Second, wind farm development provides landowners with an additional revenue source that may enable them to continue farming activities rather than sell off property for housing developments or other more-intensive land uses.

Third, croplands are already disturbed areas that will also tend to be less remote and nearer to transmission lines than some other potential sites, reducing the overall impact of projects in these areas. As potential development sites become increasingly scarce, it is important not to eliminate areas that may be good candidates for development.

¹ While updated and far more granular wind resource maps are commercially available now, we are informed by staff that the vendors restrict the public presentation of these maps.

² See, e.g., *20% Wind by 2030; Increasing Wind Energy's Contribution to U.S. Electric Supply*, U.S. DOE (May 2008) at p. 110. http://www.20percentwind.org/20percent_wind_energy_report_05-11-08_wk.pdf.

4. Tribal lands should not be excluded without tribal consultation

The RETI 1.0 screen that was developed a decade ago exclude tribal lands apparently without consulting the affected tribes. This screen continues to be used in staff's land use screening effort (Staff Report, p. C-6). Several wind farms have been and continue to be successfully developed on tribal lands, such as on the Campo Indian Reservation in San Diego County. Excluding wind resources on tribal lands will make these resources invisible in the busbar mapping process and therefore reduce the chances that transmission will be planned for these resources, harming tribal interests. To avoid such harm, the Commission should eliminate the tribal lands screen until such time as tribes can be individually consulted.

CalWEA appreciates this opportunity to comment.

Sincerely,

/s/

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