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Summary of 5/28/2024 SB 100 Tribal Working Group Comments and Questions

Meeting Minutes: Estimated 2 hours 30 minutes.

Tribal representatives had the following concerns and recommendations:

- Cultural resources should be called out in addition to “Land Use Impacts” to emphasize the significance and inclusion.
- The goals of SB 100, CARB Scoping Plan, and CPUC Integrated Resource Planning need an integrated approach to capture the full impacts of carbon-free energy planning.
 - For example, the impacts of mining natural resources to build carbon-free energy resources to meet SB 100 goals is not being discussed, analyzed, or accounted.
 - There were environmental concerns expressed regarding the amount of future mining required and the amount of existing abandoned mine sites within the state of California.
 - Desire for a more comprehensive approach that considers reporting the number of natural resources and impacts to water that will occur for SB 100 electrical buildout. Concern and consideration of natural resources to be mined/extracted within California and globally for the clean energy transition include (not limited to): copper, steel, lithium, and balsa wood (wind turbine blades). Suggests the extraction of natural resources be discussed, accounted, and analyzed along with impacts to water supply (groundwater), and oceanwater.
- Transmission impacts analysis is needed.
 - A concern that is critical to northern California (Humboldt area) is transmission being built through ancestral lands to deliver electricity to other parts of California.
 - Concerns with transmission development resulting in more clear cuts and removal of trees. Tribes wanted to see this reflected in CARB’s Scoping Plan.
- Impacts to cultural resources and sacred sites.
 - Tribes have observed solar development planned around sacred and cultural sites or resources. Tribes suggest observing the environment, the land, and sacred sites beyond project siting evaluation, and using a landscape analysis.
 - Regarding cultural analysis and studies for SB 100 and statewide energy planning, Tribes want to be involved in the structuring and scoping of cultural studies undertaken for SB 100.
- Specific to Offshore Wind (OSW) Development and Planning:
 - Impacts of (OSW) are not being discussed enough. This includes environmental impacts to the ocean, biological species, and electromagnetic impacts in the ocean.
 - Impacts of port development to service OSW sites are not being addressed and discussed comprehensively.
 - Concerns with the port sites and OSW infrastructure being built in Humboldt on long-standing mudflats. Mudflats have cultural importance and are a natural habitat for clams.

- OSW turbines block viewsapes that are culturally significant to Tribes for observing and practicing sacred rituals, some of these practices are sensitive to certain times of the year. These culturally significant viewsapes conflict with OSW locations/sites/development.
 - Fossil fuel use is required for OSW infrastructure. For example, fossil fuel generators at OSW platforms/facilities along with the use of diesel lubricant make OSW technology not a true carbon-free energy resource.
- Engagement and outreach
 - Current process and practice of engagement and outreach for SB 100 with Tribes needs to be changed and improved. Tribes do not feel included in the planning or development process for decision making and instead are brought decisions, such as policy goals, that have already been determined.
 - Tribes want a more collaborative approach with involvement, consultation, and planning at the earliest stages of decision making for statewide energy planning.
- Utility Rates and SB 100 Energy Technologies for Capacity Expansion
 - Tribes are not confident the energy resource mix selected by SB 100 and CPUC IRP process is in the best interest of ratepayers. Tribes are concerned utility customer rates will be increasing with new energy buildout.
 - Concern with SB 100 and CPUC IRP candidate energy technologies not capturing the full extent of available carbon-free technologies. For example, waste to energy is not being weighed or considered adequately along with other carbon-free technologies.
- Greenhouse gas emissions metrics
 - Water vapor acts as a greenhouse gas by accelerating the rate of global warming and climate change. Metrics for GHG reductions should address and include water vapor metrics.

Comments Collected form SB 100 Tribal Working Group Attendees on 5/28/2024
Summary Approved by SB 100 Tribal working Group Attendees on 06/11/2024.