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Defenders of Wildlife Comments on SB 319 Workshop

Additional submitted attachment is included below.



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California Energy Commission
Docket Unit, MS-4
Docket No. 23-SB-319
715 P Street
Sacramento, California 95814-5512

Delivered via email to: docket@energy.ca.gov

RE: Senate Bill 319 – Transmission Infrastructure Planning and Permitting Guidebook Workshop

Defenders of Wildlife (Defenders) respectfully submits these comments on the November 15, 2024 Joint Agency workshop for the Senate Bill (SB) 319 – Transmission Infrastructure Planning and Permitting Guidebook. Defenders is dedicated to protecting all wild animals and plants in their natural communities and has 2.1 million members and supporters in the United States, 316,000 of whom reside in California. We employ science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions to prevent the extinction of species, associated loss of biological diversity, and habitat alteration and destruction.

We strongly support the development of renewable energy production. A low-carbon energy future is critical for California's economy, communities, and environment. Achieving this future—and *how* we achieve it—is critical for protecting California's internationally treasured wildlife, landscapes, and diverse habitats. We believe transitioning to a renewable energy future need not exacerbate the ongoing extinction crisis by thoughtfully planning projects while protecting habitat critical to species.

Comments

The transmission system is quite literally the backbone of California's clean energy transition. Transmission facilities need to be appropriately planned and sited so they can be built on time. However, transmission projects frequently face delays or project failure due to poor planning and siting. Currently, the transmission planning process (TPP)

identifies the need for additional transmission between Point A and Point B which is shown as a conceptual line on a map. Then, several years go by, and the proposed solution or route for the identified transmission need emerges when it enters into the California Public Utility Commission's (CPUC) General Order 131-D or future 131-E permitting process. This transmission planning and permitting process is missing a crucial step early in the process, which routinely results in poorly sited or routed transmission infrastructure that garners opposition and causes project delays and increased costs. Transmission planning cannot just be connecting Point A to Point B. Proposed corridors and routes need to be designed using environmental and land use screens and input from stakeholders as a first step once the anticipated start/end points have been identified in the CAISO TPP process and before an application is submitted to the CPUC. This approach will help minimize environmental and land use conflicts that cause expensive and time-consuming delays in the permitting process.

We recommend the Joint Agencies explore how the California Energy Commission's Land Use Screens for Electricity Planning¹ can be used not only for busbar mapping but also for transmission route planning. These land use and environmental screens incorporate well vetted data and have been broadly accepted by stakeholders. Using best available land use and environmental screens in a transparent public process will help avoid stakeholders and communities from being blindsided by ill-conceived transmission routing.

Conclusion

We thank the workshop presenters for the informative workshop. We look forward to actively participating in the development of the SB 319 Transmission Infrastructure Planning and Permitting Guidebook. Please contact Pamela Flick at (916) 442-5746 or pflick@defenders.org or Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,

Pamela Flick
California Program Director

Kate Kelly
Consultant

¹ <https://www.energy.ca.gov/data-reports/california-energy-planning-library/land-use-screens>