

DOCKETED

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TNC comments on Darden Clean Energy Project

Additional submitted attachment is included below.



California Energy Commission
Attn: Lisa Worrall, Senior Environmental Planner
715 P Street
Sacramento, California 95814-5512
Docket Number 23-OPT-02

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

RE: Comments on Darden Clean Energy Project Staff Assessment (23-OPT-02)

Dear Ms. Worrall,

The Nature Conservancy (TNC) appreciates the opportunity to submit comments on the California Energy Commission's (CEC) Darden Clean Energy Project Staff Assessment. The proposed Darden Clean Energy Project (DCEP) is a 1,150 megawatt (MW) solar photovoltaic (PV) project with an up to 4,600 MW-hour battery energy storage system (BESS), step-up substation, operation and maintenance facility and generation-intertie line that would be located within the unincorporated area of Fresno County. The DCEP would be located on approximately 9,500 acres of undeveloped, retired agricultural land.¹

TNC is a science-based organization working throughout the world and in California to support thriving economies, preserve critical biodiversity, and advance a clean energy future. TNC actively supports California's efforts through Senate Bill (SB) 100 to achieve 100% renewable and zero-carbon energy by 2045. Over the last decade, TNC has developed research to equip communities and policymakers with information to avoid and minimize impacts to nature in planning for clean energy. This work has included supporting proactive, multi-benefit land use planning in areas of California facing land use transition due to groundwater restrictions, including scientific assessments such as TNC's *Western San Joaquin Valley Least Conflict Solar Energy Assessment*.² TNC's peer-reviewed *Power of Place West* study demonstrates that many of the lands in California that are most

¹ Darden Clean Energy Project Staff Assessment. February 2025. Pg. 4.1-1.

² Butterfield, H.S., D. Cameron, E. Brand, M. Webb, E. Forsburg, M. Kramer, E. O'Donoghue, and L. Crane. 2013. Western San Joaquin Valley least conflict solar assessment. Unpublished report. The Nature Conservancy, San Francisco, California. 27 pages.

https://www.scienceforconservation.org/assets/downloads/WSJV_SolarAssessment_2013.pdf

environmentally suitable to achieve California’s goals for 100% clean electricity are located in these areas.³

TNC supports siting utility-scale solar energy projects in locations that have lower biodiversity value and lower agricultural resource value, including lands that are salt-affected or drainage-impaired. The DCEP is an example of a location identified by research studies as lower conflict for solar energy development, including TNC’s *Western San Joaquin Valley Least Conflict Solar Energy Assessment* and *Power of Place California*.⁴⁵ As reflected in Section 3.4 of the CEC staff assessment, DCEP is located in an area of the San Joaquin Valley within the Westlands Water District that has been proactively identified by planning processes, including [A Path Forward](#),⁶ as an appropriate location for clean energy development.

Further, TNC encourages clean energy project approaches that go beyond carbon reduction to provide benefits and avoid impacts to communities and areas of conservation value through a “3C” approach that has been adopted by energy buyers throughout the United States.⁷ TNC encourages policymakers and planners in California to adopt these approaches, and appreciates that the following criteria are required as part of the [opt-in certification requirements](#):

1. An applicant has entered into one or more legally binding and enforceable agreements with, or that benefit, a coalition of one or more community-based organizations.
2. An applicant will use a skilled and trained workforce and pay construction workers at least prevailing wages, subject to statutory enforcement, or a project labor agreement.

³ G.C. Wu, R.A. Jones, E. Leslie, J.H. Williams, A. Pascale, E. Brand, S.S. Parker, B.S. Cohen, J.E. Fargione, J. Souder, M. Batres, M.G. Gleason, M.H. Schindel, & C.K. Stanley, Minimizing habitat conflicts in meeting net-zero energy targets in the western United States, *Proc. Natl. Acad. Sci. U.S.A.* 120 (4) e2204098120, <https://doi.org/10.1073/pnas.2204098120> (2023).

⁴ Online webmap: <https://www.arcgis.com/apps/TwoPane/main/index.html?appid=8a53b325116a4c3e88d2e8481b342123>. The report that describes the methods, assumptions and processing of data is: Butterfield, H.S., D. Cameron, E. Brand, M. Webb, E. Forsburg, M. Kramer, E. O’Donoghue, and L. Crane. 2013. *Western San Joaquin Valley least conflict solar assessment*. Unpublished report. The Nature Conservancy, San Francisco, California. 26 pages.

⁵ Grace C Wu *et al* 2020 *Environ. Res. Lett.* 15 074044. <https://iopscience.iop.org/article/10.1088/1748-9326/ab87d1>

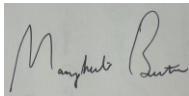
⁶ UC Berkeley and Conservation Biology Institute. Mapping Lands to Avoid Conflict for Solar PV in the San Joaquin Valley, May 2016. <https://www.law.berkeley.edu/wp-content/uploads/2016/05/A-PATH-FORWARD-May-2016.pdf>

⁷ LevelTen Energy, The Nature Conservancy, and Audubon. Beyond Carbon-Free: A Framework for Purpose-Led Energy Procurement and Development. November 2021. https://www.nature.org/content/dam/tnc/nature/en/documents/Beyond_Carbon_Free_Whitepaper_Final.pdf

3. The construction or operation of the facility will have an overall net positive economic benefit to the local government that would have had permitting authority over the site and related facility.

In closing, TNC appreciates the opportunity to submit comments on the CEC's Darden Clean Energy Project Staff Assessment. The state of California has invested significant resources in proactively identifying regions where solar energy can be built at scale with fewer impacts on natural and agricultural resources and expanding transmission capacity to these areas. Examples include state contributions to or leadership of planning initiatives, such as *A Path Forward*, the Renewable Energy Transmission Initiative (RETI), and recent updates to the land use screens for electric system planning. The west side of the San Joaquin Valley, where the Darden Clean Energy Project is located, is an example of an area where thousands of acres of irrigated agricultural land are expected to come out of production to achieve groundwater sustainability, creating an opportunity to deploy solar as part of a suite of land-repurposing strategies.

Sincerely,

A handwritten signature in dark ink, appearing to read "Marybeth Benton".

Marybeth Benton
Energy Project Director
The Nature Conservancy
Marybeth.benton@tnc.org