

## DOCKETED

<b>Docket Number:</b>	16-IEPR-03
<b>Project Title:</b>	Environmental Performance of Electricity Generation System
<b>TN #:</b>	212833
<b>Document Title:</b>	Defenders of Wildlife Comments on Draft EPR Report
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Defenders of Wildlife/Kim Delfino
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/18/2016 12:39:58 PM
<b>Docketed Date:</b>	8/18/2016

*Comment Received From: Emily Leslie*

*Submitted On: 8/18/2016*

*Docket Number: 16-IEPR-03*

## **Comments of Defenders of Wildlife on Draft EPR Report**

*Additional submitted attachment is included below.*



To: California Energy Commission  
Dockets Office, MS-4  
Docket No. 16-IEPR-03  
1516 Ninth Street  
Sacramento, CA 95814-5512  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

From: Kim Delfino, Defenders of Wildlife

Date: August 18, 2016

Subject: Comments of Defenders of Wildlife on the *Draft 2016 Environmental Performance Report of California's Electrical Generation System*

Docket Number: 16-IEPR-03

Defenders of Wildlife respectfully submits these comments to the California Energy Commission (CEC) in regards to the *Draft 2016 Environmental Performance Report of California's Electrical Generation System* (EPR) prepared in support of the 2016 Integrated Energy Policy Report Proceeding.

Defenders of Wildlife works towards protection of ecosystems, landscapes and species while supporting the timely development of renewable energy resources in California. Achieving a low carbon energy future is critical for California – for our economy, our communities and the environment. Achieving this future—and *how* we achieve it—is critical for protecting California's internationally treasured landscapes, productive farmlands, and diverse habitats.

The Joint Conservation Parties strongly support reviewing the environmental performance of California's electrical generation system. In the 10 years since the last EPR California has experienced substantial deployment of renewable energy generation in the State's quest for a low carbon energy future. Understanding the environmental consequences of this development, both good and bad, is essential for building a better future. We appreciate the efforts of Commission staff to gather the information in the draft EPR and look forward to the future policies that will be guided by this report.

## Comments

### A. Chapter 4:

The sections in Chapter 4 on biological impacts and Chapter 6 on policy development and planning clearly speak to the impacts and future steps for renewable energy development. The opportunistic approach to renewable energy generation development in the past decade has clearly resulted in landscape level impacts to multiple habitats and suites of species. Projects sited in inappropriate places have had a staggering impact on habitats and species and the mitigation costs have been equally staggering. These impacts are avoidable. Unfortunately, a multitude of similarly poorly sited projects remain in the application pipeline.

Substantial impacts to environmental resources will continue to occur unless and until project siting practices incorporate smart from the start principles, to prevent and avoid development in high conflict areas.

The EPR summarizes the renewable energy development experience over the past 10 years and comments on a variety of biological mitigation approaches (e.g. compensatory mitigation, exclusionary fencing, operational modifications) that were used to enable development of renewable energy projects.

Because a substantial number of utility scale renewable projects have been developed and are now in operation, we now have a body of experience and lessons learned on success and effectiveness of the mitigation techniques used in the development of these projects. If the EPR report were to review and quantify the mitigation outcomes from specific examples from this experience, this would provide essential knowledge for evaluating and mitigating future projects as well as developing and updating best management practices.

Moving forward we will continue to advocate for low conflict, least regrets renewable energy generation and transmission siting and design. Such siting would actively avoid sensitive locations and destructive practices, and reduce the impacts to landscapes, habitats, and species. This in turn would dramatically reduce mitigation requirements and costs, and project development costs. We recommend establishment of policies that make impact avoidance the first priority in the mitigation hierarchy. Compensatory mitigation, while essential when an impact occurs, is a net loss proposition.

Attachment A provides more specific and direct comments in line with the text of Chapter 4.

B. Chapter 6:

The various planning efforts described in Chapter 6 are expected to be a valuable step in moving to low conflict, least regrets future renewable energy development. Attachment B contains specific comments to sections of Chapter 6.

**Conclusion**

Overall, we continue to encourage the development of policies that support the implementation of landscape-scale planning for renewables. The state agencies (e.g., CAISO, CEC and PUC) should develop policies and stakeholder processes that prioritize renewable energy generation in least-regret locations (e.g., zones). Providing transmission to least-regret zones identified by landscape-scale planning is critical for renewable energy development and facilitates the long term implementation of the findings from these planning efforts.

Our organization strongly believes in the importance of a California energy future that uses landscape-scale planning to *first* identify preferred areas of least-regret for generation development and then strategically plan transmission investments to these areas for timely development and delivery of renewable energy. In this paradigm, the evaluation of needed transmission would consider the buildout of consensus generation zones as the guide, prioritizing the need to protect and manage natural and working lands.

Defenders of Wildlife appreciates the opportunity to comment on the *Draft 2016 Environmental Performance Report of California's Electrical Generation System*. The report is a critical milestone marking the progress that has been made in recent years, and informing the path forward, providing lessons learned to guide the development of future policies. We look forward to continued participation in the proceeding.

Joint Conservation Parties – Comments on the *Draft 2016 Environmental Performance Report of California's Electrical Generation System*

August 18, 2016

Sincerely,

A handwritten signature in black ink, appearing to read "Kim Delfino", with a long horizontal flourish extending to the right.

Kim Delfino

California Program Director

Defenders of Wildlife

[kdelfino@defenders.org](mailto:kdelfino@defenders.org)