

## DOCKETED

<b>Docket Number:</b>	17-IEPR-13
<b>Project Title:</b>	Strategic Transmission Investment Plan
<b>TN #:</b>	218904
<b>Document Title:</b>	Defenders of Wildlife Comments on the CEC's May 24, 2017 Integrated Energy Policy Report Strategic Investment Plan
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Defenders of Wildlife
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	6/15/2017 4:40:31 PM
<b>Docketed Date:</b>	6/15/2017

*Comment Received From: Emily Leslie*

*Submitted On: 6/15/2017*

*Docket Number: 17-IEPR-13*

**Defenders Comments on the California Energy Commission's May 24, 2017  
Integrated Energy Policy Report Strategic Investment Plan and Landscape Planning  
Workshop**

See attached document.

*Additional submitted attachment is included below.*



June 14, 2017

To: California Energy Commission  
Dockets Office, MS-4  
Docket No. 17-IEPR-13  
1516 Ninth St  
Sacramento, CA 95814  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

From: Kim Delfino, Defenders of Wildlife

Subject: Comments on the California Energy Commission's May 24, 2017 Integrated Energy Policy Report Strategic Investment Plan and Landscape Planning Workshop (Docket Number: 17-IEPR-13)

Defenders of Wildlife (Defenders) respectfully submits the following comments on the California Energy Commission (Commission)-sponsored Integrated Energy Policy Report (IEPR) Strategic Investment Plan and Landscape Planning Workshop on May 24, 2017.

Defenders, on behalf of our 140,000 members and supporters in California, works towards protection of wildlife, ecosystems, and landscapes 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 wildlife, landscapes, productive farmlands, and diverse habitats.

We strongly support leveraging analytical tools for landscape scale analysis, and facilitating government efforts for renewable energy planning. Defenders appreciates that the Commission has put so much effort into developing tools to this end. We offer the following additional comments on the May 24 workshop.

The attendance and variety of parties represented at this workshop was truly impressive. We noted several key points raised by each of the speakers in the morning panel, "Policy Perspectives on Using Interactive Data Platforms to Support Collaborative Planning." In the following sections, we will highlight and elaborate on key points that were raised by each of the speakers in the morning panels.

We greatly appreciated the discussion offered by Mr. Kevin Hunting, of the California Department of Fish and Wildlife. Defenders agrees that facility siting is critical. Better geospatial data quality is essential, at higher resolution, in order to support siting of energy infrastructure facilities. We note

that increasing the resolution of the data on these platforms tends to be a costly endeavor and that funding may need to be authorized to support continued work in this area.

The presentation by Ms. Lorelei Oviatt of Kern County demonstrated leading-edge ideas, including using online environmental data for permitting, rebalancing land use for groundwater optimization and protection, and using electronic maintenance application fees paid by applicants to fund platform development. We support the development of these ideas and would like to see the Commission support opportunities for other jurisdictions to benefit from these lessons learned. This shared pioneering experience could benefit many local governments.

The discussion by Mr. Kevin Richardson of Southern California Edison (SCE), was also very informative. It was valuable to hear that Data Basin has been found so useful to SCE relative to siting transmission lines. We agree with Kevin that better infrastructure siting leads to higher chances of overall project success. Interactive online platforms such as Data Basin can help define general study areas and greatly facilitate the licensing process. We note this also parallels Defenders' "Smart from the Start" siting recommendations and we support the suggestion that further transmission line routing development under FERC 1000, prior to bid solicitations, would be beneficial. We are particularly interested in the stakeholder involvement capabilities that the Data Basin platform provides.

Environmental non-governmental organizations (NGOs) have invested heavily in these interactive online platforms for environmental data sharing, with countless hours of labor and stakeholder input. Their use underscores Defenders' "Smart from the Start" siting recommendations, and facilitates stakeholder collaboration. We caution, however, that action and permitting agencies should not rely solely on interactive online data; with site-specific ground survey data still a critical part of the process.

As above, we echo the comments offered by Mr. Steve Cheung from the Department of Defense (DOD) that Data Basin has been instrumental in awareness, education, collaboration, and long-term sustained collaboration over the years. Defenders was pleased to hear Mr. Cheung's comment that the platform has helped reduce conflict for early DOD consultations, which apparently occur at a frequency of about once per week.

There were several important questions posed by Mr. Ken Alex upon the conclusion of the workshop, highlighting the critical next steps in the development of the platform.

- How to ensure quality control and durability?
  - We have found stakeholder involvement, for example contributions from the biological resource experts from environmental NGOs, to be very valuable in supporting quality control

- However, there are limits to the level of involvement that NGOs can be expected to provide on a volunteer basis
- There are multiple types of quality assurance needed:
  - Quality assurance is needed to ensure that the best scientifically available environmental data is used. Environmental NGOs have played an important role in this type of QA thus far.
  - Quality assurance is also needed to ensure that the platform functionality works as expected, and that the design of the platform is using the best available methods. This role may best be played by a third party technical consultant with custom skills and experience in software QA.
  - Quality assurance is also needed to ensure that various types of landscape planning products developed using this platform adhere to a set of standards. These standards have not yet been defined to our knowledge, aside from the RCIS Program Guidelines<sup>1</sup> available online at the California Department of Fish and Wildlife website.
- Where should the platform be housed, long term?
  - We note that Mr. Zach Townsend commented verbally in the workshop, that California Government Operations Department could be a good place for it, but that there are jurisdictional questions
  - Defenders recommends that a review of potential agencies should be conducted; it would be beneficial to identify the most competent, stable, content- and policy-neutral agency to house these platforms long-term
  - It may also be beneficial to consult with Commission departments overseeing energy efficiency proceedings, since they may offer valuable lessons learned from many years of maintaining large online data sharing platforms (see for example the CPUC DEER database<sup>2</sup>)
- Can stakeholders provide analysis of quantifiable economic benefit, to justify budget requests?
  - It is Defenders' opinion that Data Basin provides immeasurable utility and cost savings to local jurisdictions. A full economic analysis is beyond the scope of our participation in this proceeding, but this may be a study worth performing in future work.
  - The user base includes everything from individual citizens to highest levels of state and federal government.

---

<sup>1</sup> <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=141619&inline>

<sup>2</sup> <http://deeresources.com/>

We were also impressed with the numerous project examples presented in the Workshop's Second Morning Panel (Project Examples - Using Interactive Data Platforms to Support Collaborative Planning), including use in the following planning documents/analyses:

- California Desert Biological Conservation Framework Draft Report
- DRECP Site Assessment Tool
  - We recommend a private land data layer addition
- Audubon Important Bird Areas
- Kern County Natural Community Conservation Plan (online) for San Joaquin Valley
  - Ms. Oviatt mentioned that the Accela land management software generates site plan data and pulls information from Data Basin, and tracks project compliance with conditions of approval and mitigation requirements
  - Online resources could similarly help support the California Environmental Quality Act process; especially post-construction monitoring
- Antelope Valley Regional Conservation Investment Strategy
- American Farmland Trust - Exploring the Land & Water Resources Intersection in California's San Joaquin Valley
  - Identified locations of high land value, low water stress (this represents most valuable farmland); then identified subset of these areas, subject to high development risk, target for conservation

These examples show a variety of innovative ways in which Data Basin is currently being used. We anticipate that there are many additional venues where this platform can be used, yet to be explored, which can prove beneficial to action agencies, permitting agencies and stakeholders alike.

In conclusion, Defenders appreciates the opportunity to comment on the May 24, 2017 Workshop. We recommend that the Commission move forward with continued development of the Data Basin platform; in particular focusing on quality, durability, continuity, and interagency collaboration.

Sincerely,



Kim Delfino  
California Program Director  
Defenders of Wildlife  
[kdelfino@defenders.org](mailto:kdelfino@defenders.org)