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ADP's Comment re 8/2/17 Lead Commissioner Workshop on Environmental Information for Energy Planning

Additional submitted attachment is included below.



August 16, 2017

Chairman Robert B. Weisenmiller,
IEPR Lead Commissioner
Commissioner Karen Douglas,
Siting Lead Commissioner
California Energy Commission
1516 Ninth St.
Sacramento, Calif. 95814

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**Re: Docket Number: 17-IEPR-13
Proceeding: August 2, 2017 Lead Commissioner Workshop on
Environmental Information for Energy Planning**

Dear Chairman Weisenmiller and Commissioner Douglas:

We are writing to you on behalf of the Alliance for Desert Preservation (“ADP”), which is a nonprofit mutual-benefit corporation formed to protect the environmental and economic well-being of the High Mojave Desert, and to support a sustainable future.

We have participated in the following IEPR workshops: (1) a May 24, 2017 workshop which, according to the published notice from the California Energy Commission (the “Commission”), was to promote the “variety of landscape-scale planning approaches” of the DRECP, RETI 2.0 and the San Joaquin Valley “best fit/least conflict” solar initiative in order to “identify suitable areas for [utility-scale] renewable energy development” and new transmission; and (2) an August 2, 2017 workshop which, according to the published notice, was to “present an update on science-based environmental information assembly, online tool development, and [a] case study approach to support future renewable energy and transmission planning.”

We previously submitted a letter, dated June 7, 2017, which explained why the IEPR's reliance on landscape-level planning is misplaced. In this letter, we will expand upon some of the points made in our previous letter, and in our oral public comments at the August 2, 2017 workshop.

According to the Commission, the central issue in this State – in terms of formulating long-term renewable energy policy – is determining where and in what quantities new utility-scale renewable energy and transmission projects should be sited; how to do this while preserving this State's natural habitats and human communities is treated as a subsidiary question. So long as utility-scale projects are viewed as the only viable means of achieving RPS and GHG-reduction goals, any emphasis placed on fostering new generation projects inevitably works against environmental preservation, and vice versa. We believe -- along with many other well-informed parties (including the EPA, as will be discussed below) -- that renewable energy *and* conservation can be simultaneously advanced by encouraging a mixture of point-of-use renewable energy technologies focused on the built environment (such as rooftop/parking lot solar). Landscape-level planning need no longer be used to rush as many utility-scale MWs as possible onto non-urban lands.

Landscape-level planning, as called for by the DRECP¹, would pay lip-service to a “conservation framework” of sorts, but this turns out to be nothing more than a map stitched together from geospatial data layers representing the prevalence of certain plant and animal species. No mapping exercise could possibly, let alone perpetually, preserve California's diverse and dynamic ecosystems and micro-environments in the face of mounting habitat losses to utility-scale renewable energy and transmission development, among other things. This unimaginably complex web of natural habitats simply cannot be managed using drop-down tabs appended to geospatial “intactness” and “conservation values” maps. Maintaining species resiliency for the entire State would require far more than a map or two. It would require top-to-bottom biological management employing a deity-level of knowledge and applied wisdom: no matter how many geospatial layers are loaded onto a collaborative central platform – no matter how many well-intentioned cooks stir the proverbial data broth – there would be no way to predict with the necessary precision the complex, cumulative and scaffolding environmental effects that would result from relegating hundreds of thousands more acres to utility-scale and related transmission development, other than to note with certainty that widespread habitat loss would be inevitable, that the desert's ability to sequester carbon would be progressively and permanently destroyed² and that the collapse of eons-old ecosystems would be a grim and distinct possibility.

¹ The critique in this letter of the DRECP also applies to RETI 2.0, which seeks to build on the DRECP. But, for purposes of brevity, this letter will refer only to the DRECP.

² Destroying this valuable and irreplaceable carbon sink through industrialization would work directly against the purposes underlying this State's RPS goals and GHG-reduction

In reality, the landscape-level planning approach, as advocated by the DRECP, completely shirks any responsibility for preserving intact habitats; its declared purpose and need is to quickly site enormous amounts of industrial-scale projects. It makes no pretense of taking on management of, or of even monitoring, ongoing environmental health or losses, nor does it even call for steps aimed at minimizing them (other than, perhaps, to ask developers to undertake “band-aid” mitigation measures); all it calls for is greenlighting utility-scale development in some geographic areas while precluding it in others, with the affected eco-regions left to either sink or swim. And inevitably they will sink.³

Landscape-level planning does not even do a very good job of picking optimal locations for utility-scale development and conservation. By relying on “zoomed-out,” pixel-driven mosaics, the landscape-level approach completely ignores the environmental damage caused by specific large-scale renewable energy projects, i.e., actual conditions on the ground at and around proposed project sites. This remote, detached perspective lends itself to rationalizing away all the ecological and social damage that utility-scale projects would inflict, individually and cumulatively, as well as inconvenient environmental science about what is happening, for instance, to groundwater sub-basins and wildlife connectivity corridors and habitats.⁴ The IEPR must not adopt the ethos underlying landscape-level planning under the DRECP, which is: no matter what damage utility-scale and transmission projects will inflict on local populations and habitats, let’s not dwell on it too much because geographical winners and losers will have to be declared anyway if we’re to meet various statewide goals and mandates.

objectives, and undercut the justification proffered for ramping up the development of utility-scale renewables.

³ The 2016 Integrated Energy Policy Report Update (the “Update”), at p. 51 et seq., unflinchingly catalogs the alarming degree to which renewable energy development has degraded California lands, especially those found in the California desert. The Update indirectly acknowledges that such degradation is inevitable in the face of such development by positing (at p. 55) that landscape-scale planning, like the DRECP, “*attempts to address this concern* by identifying the most appropriate areas for large-scale renewable energy development within the desert landscape by designing a conservation framework to foster and maintain species resiliency across desert ecosystems, with explicit consideration of the impacts of climate change.” (Emphasis added.) As indicated in the Update, the DRECP’s “conservation framework” is nothing more than geospatial mapping that clearly is not up to the task.

⁴ Scott Flint stated, at the August 2, 2017 workshop, that landscape-level planning is not intended to supplant site-specific detail, but the whole purpose of landscape-level planning is to pre-anoint certain regions for streamlined utility-scale and transmission applications. That is the basic premise of the DRECP.

Among the biggest of those losers would be the non-urban populace that is being asked to pay the ultimate price for new utility-scale and transmission development. Nevertheless, they have not been brought into any landscape-level planning process. The DRECP has not been transparent and collaborative, other than for large interest groups bent on propagating large-scale projects. There is no reason to believe that the process would be any more transparent or collaborative under the IEPR.

Just as importantly, consigning the entire State to a landscape-level planning process would subject it to a perilous experiment on a vast and unprecedented scale. The premise that landscape-level planning would work on that scale – that tens of thousands of MWs of new utility-scale and transmission projects will not destroy the intactness of our natural habitats -- is unproven theory, one that has never been field-tested anywhere in this State,⁵ even as it is clear that the massive development being proposed will inevitably unravel natural systems.

Missing from the discussion, at either workshop, has been any exploration of the fundamental issues noted above, let alone the question of whether we even need a lot of new renewable energy and transmission projects. Well-informed commentators have pointedly suggested that we do not.

1. The EPA recommended, in its February 23, 2015 letter, that the REAT agencies (the sponsors of the DRECP) re-evaluate “the amount of renewable energy that may need to be produced in the Plan Area,” i.e., discard the DRECP’s single-minded focus on fostering utility-scale renewable energy projects because they are fast being rendered obsolete by technological and market developments. In that regard, the EPA stated: “. . . significant market and policy developments affecting the renewable energy industry – such as the sharp decline in the cost of rooftop solar-powered electricity and rapid deployment of energy storage – warrant a re-evaluation of the renewable energy planning effort conducted for the Plan Area [for the DRECP] by the California Energy Commission in July 2012. These developments have the potential to drastically increase the amount of distributed forms of renewable energy (including rooftop solar) produced in the state, which could reduce the need for utility-scale solar projects to be developed in the Plan Area;”

⁵ One or more speakers at the May 24, 2017 workshop posited that landscape-level planning worked well in the San Joaquin Valley. But, unlike California’s deserts, the San Joaquin Valley has a super-abundance of unmistakably ruined, parched, salt-contaminated former agricultural land that can no longer be put to any productive commercial use and that can no longer host viable natural communities. Thus, it was relatively easy to arrive at a consensus there as to where utility-scale solar projects should go, and such siting did not substantially disturb interspersed human and natural communities, or aesthetically-pleasing natural landscapes, as would be the case in our deserts.

2. According to a June 22, 2017 *Los Angeles Times* article, curtailments of solar and wind production for the first quarter of 2017 were more than double the same period last year, and existing power plants run, on average, at slightly less than one-third of capacity and are being retired early;
3. The Office of Ratepayer Advocates noted -- in their comments in PUC proceeding 15-02-020 -- that the IOUs are on track to meet their RPS requirements and will not have a procurement need until 2023; and
4. According to a July 19, 2017 article in the *San Diego Union Tribune*, 27.9% of this State's power already comes from renewable energy sources, which is a 3.4% increase from 2016, and a three-fold increase from ten years ago. Solar energy has increased 31.5% from 2015.

The statistics cited in that article reflect only renewable energy output from utility-scale generators of 1 MW or greater, and do not include all of the power generated by the explosive growth in rooftop/parking lot solar. This means that renewable energy's share of statewide output is far greater than 27.9%. Is there any doubt that, in much less than the thirteen years that will transpire between now and 2030, this State will easily surpass the 50% goal? Why, then, are federal and state agencies continuing to so strongly apply the accelerator when it comes to pushing for more utility-scale renewable energy projects?

Undaunted by any of the evident flaws in the landscape-level planning approach, and by its overweening reliance on utility-scale generation, speakers at both the May 24 and August 2 workshops extolled the DRECP and RETI 2.0 as role models for a statewide landscape-level planning approach. But adopting a DRECP-style approach would not yield positive planning outcomes for the reasons stated above; and the DRECP is itself flawed and unworkable. These flaws are discussed in detail in our June 7, 2016 letter, and include:

1. The DRECP geospatial data planning approach is not by any means the product of the best science available;
2. The creation and interpretation of the DRECP datasets was the product of a highly subjective process bent on fostering utility-scale renewable energy projects in the California desert;
3. Utility-scale renewable energy projects are fast being rendered obsolete by technological and market developments; and
4. The DRECP approach would produce poor planning decisions by disenfranchising local residents and governments that would be most affected by particular projects.

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For these reasons, among others, the DRECP has been highly controversial since its inception, with many well-informed communities, individuals and local governments (including San Bernardino County) firmly opposing it. In fact, they have submitted scores of letters into the record that point out the DRECP's many shortcomings. The DRECP's only non-governmental defenders have been big developers and utilities that would profit from its implementation. Why take their side against the greater welfare of California's citizens and natural habitats?

We urge that the IEPR abandon its uncritical embrace of landscape-level planning (and utility-scale solar renewable energy) as its primary energy planning tools, and that a fresh look be taken at whether the State really needs another influx of new utility-scale and transmission projects to reach its renewable energy goals. And we urge that the Commissioners remedy the flaws we have referenced in the landscape-level approach, rather than endeavor to build on and thereby magnify them. Such a remedy would begin with calling for true site-specific environmental analyses for each project, where geospatial mapping would be the jumping off point for a thorough analysis, not the end point it is under the DRECP. Further, the unexamined assumption – that the price we have to pay to meet our energy goals is pervasive habitat destruction caused by utility-scale renewable energy – must be entirely discarded.

In sum, while the REAT agencies believed themselves bound by their legal mandate to skew the DRECP process toward siting and fast-tracking immense amounts of utility-scale projects, the Commission is under no such compunction. Hence it need not fall in line with, and emulate, the flawed analytical processes embodied in the DRECP.

We look forward to participating in this process, and thank you for considering the points made in this letter.

Very truly yours,

Alliance for Desert Preservation



Richard Ravana, President