DOCKETED	
Docket Number:	19-SB-100
Project Title:	SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future
TN #:	234732
Document Title:	Defenders of Wildlife Comments on Sept 2 2020 SB 100 Draft Results Workshop
Description:	N/A
Filer:	System
Organization:	Defenders of Wildlife
Submitter Role:	Public
Submission Date:	9/15/2020 2:10:48 PM
Docketed Date:	9/15/2020

Comment Received From: Defenders of Wildlife
Submitted On: 9/15/2020
Docket Number: 19-SB-100

Defenders of Wildlife Comments on Sept 2 2020 SB 100 Draft Results Workshop

Additional submitted attachment is included below.

California Program Office
980 Ninth Street, Suite 1730 | Sacramento, California 95814 | tel 916.313.5800
www.defenders.org

September 15, 2020

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Electronically filed to the Docket

RE: Docket No. 19-SB-100
Comments on September 2, 2020, SB-100 Draft Results Workshop

Defenders of Wildlife (Defenders) respectfully submits these comments on September 2, 2020, SB-100 Draft Results Workshop (Workshop). Defenders, on behalf of our 279,000 members and supporters in California, works towards the protection of wildlife, ecosystems, and landscapes while supporting the timely development of renewable energy resources in California. Achieving a low carbon energy future is essential for California – for our health, our communities, our economy, and the environment. Achieving this future—and *how* we achieve it—is crucial for protecting California's internationally treasured wildlife, landscapes, productive farmlands, and diverse habitats.

Comments

We appreciate the Joint Agencies team's efforts in developing the SB 100 Joint Agency Report (SB 100 Report) and holding the Workshop. Modeling and analyzing necessary energy and transmission resources needs is foundational for meeting SB100 goals. However, achieving SB 100 goals is not just a matter of identifying how much and what kind of generation must be developed and procured. The achievement of the goals set forth under SB 100 will result in significant land conversion and development in California and the West. During the staff presentation on September 2, Ms. Gill discussed the resource build rates and estimated that the in-state build for all resources would require between 367,000 and 612,000 acres of land to meet SB 100 goals. When you consider that California's entire development footprint (not including agriculture) is estimated at five million acres, an additional buildout to meet energy needs alone of up to 600,000 acres by 2045 is a substantial and rapid addition to California's development footprint. Such a large and rapid conversion of land could proceed in an orderly manner or could result in significant land use disputes. How such a conversion unfolds will depend on how the state chooses to plan for and coordinate this effort.

Planning for Energy and Land Use

Achieving the energy and transmission builds projected by the SB 100 Joint Agency team and those in the California Public Utility Commission's Integrated Resource Planning proceeding will require a consistent and substantive amount of renewable energy development that will transform hundreds of square miles of land into industrialized land use. Unless thoughtfully planned and coordinated, such a transformation can be expected to be fraught with controversy, potential harmful impacts to natural resources and communities, and in some cases, litigation, all of which will result in delay, expense, and uncertainty that California cannot afford. Meeting SB 100 is as much about acres of land development as it is about megawatts of generation and transmission. As we learned from past renewable energy development efforts in the desert and Central Valley, energy planning is land use planning.

The Modeling Framework and Scenarios Overview (Overview) indicated that non-energy benefits (NEBs) such as land use, public health, air quality, water resources, economics, and resiliency could not be fully integrated into this round of modeling.[1] The Overview indicated that the SB 100 Report will include a "state-level discussion on topics including affordability, public health, reliability, land use, and workforce development."[2] We are concerned that a "state-level discussion" will not adequately address the full breadth of land use/environmental planning and community outreach that will be required to achieve the level of land development that will be required to meet SB 100. Land use/environmental planning and community outreach must be fully addressed and cannot wait another four years until the next SB 100 Report.

SB 100 specifically requires consideration of environmental costs and environmental protection. The bill directed the Joint Agencies and all other state agencies to take "…into full consideration the economic and environmental costs and benefits of renewable energy and zero-carbon resources."[3] The legislation further directed the Joint Agencies to consult with all California balancing authorities to produce a joint report to the Legislature that includes a review of the 100% renewables and zero carbon by 2045 policy "…focused on technologies, forecasts, then-existing transmission, and maintaining safety, environmental and public safety protection, affordability, and system and local reliability."[4]

We reiterate our previous comments – consideration of land use implications in the development of lands for renewable energy generation and transmission is state policy and required by CA Public Resources Code (CA PRC) 9001, which states "[i]t is the policy of the state that the protection and management of natural and working lands is an important strategy in meeting the state's greenhouse gas emissions reduction goals." (emphasis added)

[1] https://efiling.energy.ca.gov/getdocument.aspx?tn=234542 pg. 9
[2] Ibid
[3] CA Public Utility Code Section 454.53(b)(2)
[4] CA Public Utility Code Section 454.53(d)(2)(A)

Consideration of natural resources and land use as a component of environmental costs and benefits will yield outcomes that identify least-cost/best-fit solutions to siting generation and transmission, provide pathways to benefit disadvantaged communities, and facilitate compliance with the requirements of SB 100 and CA PRC 9001 et seq.

SGMA Lands

With the implementation of the Sustainable Groundwater Management Act (SGMA), it is expected that between 535,000 and 780,000 acres of farmland may be retired to address our state's severe groundwater overdraft problems.[5] (Public Policy Institute of California, "Water and the Future of the San Joaquin Valley" (2019)). These lands may prove to be ideal locations for renewable energy projects to meet SB 100 goals and could provide a new revenue source for landowners who are facing land retirement. We strongly recommend that the SB 100 Joint Agencies consider these lands for renewable energy development, which will provide much needed economic benefit to the affected regions.

Environmental Screens

We applaud the inclusion of environmental and land use screens in the modeling and analysis of resource potential and renewable transmission zones for the SB 100 Report. Environmental screens front-loaded into the modeling and analysis provide the foundation for energy planning that identifies appropriate least conflict locations for development as a fundamental output rather than an after-thought. Identification and direction of generation and transmission development to least-conflict lands will shorten development timelines, benefit communities, and reduce ratepayer costs associated with inappropriately sited projects. The selection of Desert Renewable Energy Conservation Plan/San Joaquin Valley, which includes Renewable Energy Transmission Initiative 2.0 Categories 1 and 2, provides a foundation to model generation and transmission based on legally permissible development on lands identified as "least-conflict" via transparent stakeholder-driven processes. Moving forward, the SB 100 team should work with the Governor's Office of Planning and Research (OPR), the California Natural Resources Agency (CNRA), and the joint CPUC and CEC busbar modeling efforts to advance the use of environmental screens.

Expand Joint Agency Team

A comprehensive approach is fundamental to meeting California's energy goals. Moving forward, we request that the SB 100 Joint Agencies team include representatives from OPR, CNRA, California Department of Fish and Wildlife (CDFW), Department of Conservation's Division of Land Resource Protection (DLRP), and Department of Water Resources (DWR) in SB 100 planning. OPR, CNRA, CDFW, DLRP, and DWR will bring the natural resource information and land use planning input and expertise required to achieve SB 100 goals in a timely, sustainable, and environmentally responsible manner. We also recommend consideration of the establishment of an energy super agency comprised of the CEC, CPUC, California Air Resources Board, OPR, CNRA,

[5] Public Policy Institute of California, "Water and the Future of the San Joaquin Valley" (2019) https://www.ppic.org/wp-content/uploads/water-and-the-future-of-the-san-joaquin-valley-overview.pdf

CDFW, and California balancing authorities to facilitate coordinated, nimble, and comprehensive energy and transmission planning.

Conclusion

Thank you for the opportunity to provide initial comments on the September 2, 2020, SB-100 Draft Results Workshop. We look forward to actively participating in the development of the SB 100 Report. Please contact Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,

Pamela Flick
California Program Director

Kate Kelly
Consultant