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**Defenders of Wildlife Comments on SB 100 Resource Mapping  
Workshop**

*Additional submitted attachment is included below.*



## California Program Office

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California Energy Commission  
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1516 Ninth Street  
Sacramento, CA 95814-5512

Submitted via electronic comment system

RE: Docket 21-SIT-01 - Comments on August 12, 2021 Joint Agency Workshop on Senate Bill 100 Resource Mapping

### Introduction

On behalf of Defenders of Wildlife (Defenders), we respectfully submit these comments in response to the August 12, 2021 Joint Agency Workshop on Next Steps to Plan for Senate Bill 100: Resource Mapping (Workshop). Defenders is committed to achieving a low carbon energy future that centers on the health of California communities, our economy, and the environment. We are excited to see the geospatial analysis and resource mapping come to life and appreciate the thoughtful and hard work of Commissioner Douglas and the Energy and Infrastructure Policy team.

As we have noted in previous comments, energy planning is land use planning. Consideration of land use and environmental opportunity and constraints is foundational to enable effective energy planning that reduces risks of unintended impact, conflict, and disputes and ensures timely build-out. The resource mapping methodology shown in the Workshop provides the connection between SB 100, the Integrated Resources Plan, and transmission planning that will enable a timely build of generation and transmission. The California Energy Commission, California Public Utilities Commission, and the California Independent System Operator have an opportunity to plan for and coordinate this effort and it must happen now. Accordingly, we offer the following observations and recommendations:

### Recommendations

#### **I. Collaborative geospatial analysis for generation and transmission planning to accelerate permitting timelines and lower overall project costs.**

Project failure is a significant concern in meeting SB 100 goals, and one only needs to look at projects that have failed due to siting conflicts with natural resources or litigation, or both. Siting a generation or transmission project that conflicts with high-value natural resources such as

endangered species and their habitats will likely result in increased permitting uncertainty, increased mitigation costs, project development delays, litigation, and/or project failure. Avoiding and minimizing conflicts with high-value natural, agricultural, and cultural resources is the simplest and most cost-effective way to reduce project failure.

The “Starting Point” Resource Map can identify how land use impacts vary across scenarios and assess the relative environmental impacts in different areas. This mapping can be used to identify areas of high generation potential and low environmental conflict and then enable CAISO to identify where future investments should be directed. This level of analysis and planning is foundational to identifying strategies to avoid, minimize or mitigate environmental impacts and maximize environmental co-benefits. California cannot balance clean electric grid infrastructure needs with efforts to restore, conserve, and strengthen natural and working lands unless transmission is planned to support and prioritize energy development in locations that avoid or minimize impacts to natural and working lands. Increased attention and agency coordination is urgently needed during the next nine years to ensure that California’s pursuit of its clean energy goals does not undermine its natural resource and climate goals. This includes implementation of Executive Order N-82-20, which sets a state goal to conserve 30 percent of the state’s lands and waters by 2030 and to identify and implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities.

## **II. Mapping Must Include Key Resources**

The geospatial mapping and analysis effort must continue to include key resources. One commenter suggested wind be excluded from analysis and mapping. Onshore wind energy is projected to require over 200,000 acres of development by 2045.<sup>1</sup> Excluding 25% of the projected acres of development from the very planning recommended by the SB 100 Joint Agency Report undermines informed planning for transmission.<sup>2</sup>

Additionally, future rounds of mapping and analysis should be expanded to include state waters to identify suitable areas for offshore wind and ensure that the necessary long lead time development of transmission and other support infrastructure is identified and planned to both maximize project viability and protect high-value natural resources of offshore wind projects in state and federal waters.

## **III. Establish a Stakeholder Technical Workgroup**

The development of geospatial mapping and analysis is highly iterative and at key points needs fresh eyes on the process and products. Stakeholder technical workgroups have benefited from the

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<sup>1</sup> <https://efiling.energy.ca.gov/getdocument.aspx?tn=239298> per Slide 18

<sup>2</sup> <https://efiling.energy.ca.gov/EFiling/GetFile.aspx?tn=237167&DocumentContentId=70349> at pg. 134

underlying planning activities<sup>3</sup> for this mapping effort. The establishment of a stakeholder technical workgroup for this effort would leverage outside knowledge and provide a level of ground-truthing that would similarly benefit this effort.

## Conclusion

Thank you for the opportunity to provide comments on the Workshop and the next steps to plan for the generation and transmission needed in order to meet the SB 100 resource build. We look forward to actively participating in the continued development of the resource mapping and implementation of SB 100. Please contact Kate Kelly at [kate@kgconsulting.net](mailto:kate@kgconsulting.net) with any questions.

Sincerely,



Pamela Flick  
California Program Director

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<sup>3</sup> <https://efiling.energy.ca.gov/getdocument.aspx?tn=239298> per Slides 9 and 10