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**TNC of California Comments - CEC IEPR Commissioner Workshop
on Land Use Screens**

Additional submitted attachment is included below.



October 14, 2022

Docket: 22-IEPR-02

Dear Vice Chair Gunda, Commissioner Vaccaro, and CEC Staff:

The Nature Conservancy (TNC) is a science-based organization working throughout the world and in California to achieve better climate outcomes, advance a clean energy future, protect communities against climate impacts, support thriving economies, and advance the conservation of critical lands, waters, and biodiversity. TNC actively supports California's efforts through SB100 to achieve 100% renewable and zero-carbon energy by 2045 and views spatial planning as critical to the success of achieving these goals while protecting communities and the natural environment on which all life depends. The challenges ahead to scale to the level of clean energy deployment necessary are significant; however, spatial planning serves as an important and powerful set of tools and approaches to guide achieving California's goals in ways that benefit, and avoid harm to, communities and habitat.

TNC would like to thank the Commissioners and Staff for their commitment to best practices in spatial planning and adoption of additional, valuable data as it becomes available, as demonstrated during the recent IEPR Commissioner Workshop on Land Use Screens and through the Land Use Screens for Electric System Planning Draft Staff Report. TNC would especially like to applaud the CEC's incorporation of important climate resilience data as forward-looking and crucial to future outcomes for communities, habitat, and species throughout the state. With this attention to land use screens, the agency is smartly preparing California energy planning processes for the complex challenges and careful decision-making required to reach the levels of industrial-scale clean energy and infrastructure needed to decarbonize California. Additionally, the CEC's emphasis on spatial planning as an opportunity to create flexibility and multiple pathways for clean energy development is a vision that TNC shares and strongly supports.

This September TNC released a new energy, economic, environmental, and geospatial report, [Power of Place West](#), that demonstrates how the eleven Western states, including California, can affordably and reliably achieve economy-wide net-zero greenhouse gas emissions by 2050 and protect the most sensitive natural and ocean areas. This study, that applies the peer-reviewed methodology leveraged in TNC's 2019 Power of Place California, demonstrates that while Western states have 20x the suitable land needed for solar, 13x the suitable area needed for offshore wind, and 3x the suitable land needed for onshore wind, the continuation of current energy development trends and practices could result in the loss of more than 10 million acres of important habitat. Thus, the report calls for tools, planning, and frameworks that bring

state and local governments and community groups together early on in planning processes and with a spatially explicit emphasis.

TNC commends the CEC on the approach, plans, and related data outlined in the Land Use Screens Staff Report. TNC would also like to echo the public comments during the recent workshop emphasizing support for the CEC's plans to incorporate social factors data to ensure "benefits and burdens" are shared and encouraging use of the full suite of available environmental justice data. An approach to gathering and applying this data that goes beyond geospatial observation, specifically to validate data and related conclusions with communities through best practices, such as translation services and offering a range of available and accessible materials, will be critical to successful use and accuracy of this data.

Additionally, TNC agrees with comments made on the significance of water data that can bolster public and interagency understanding of land most likely to transition from agricultural use to inform estimates of and planning relating to land that may be available for solar. Lastly, with consideration of out-of-state procurement and Power of Place West's demonstration of the cost savings (estimated at \$2 billion USD) and land and ocean use efficiency opportunities represented by sharing clean energy resources across the West, TNC supports the CEC exploring a tractable approach that considers nearby, out of state resources with greater fidelity.

TNC greatly appreciates and applauds the CEC's efforts to innovate and expand on the state's spatial planning capabilities and approach, and looks forward to participating in efforts to realize this full vision.

Sincerely,

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