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**Defenders of Wildlife Comments - Funding to Advance
Environmental Sustainability of Clean Energy Transition Workshop
23-ERDD-1**

Additional submitted attachment is included below.



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California Energy Commission
Docket Unit, MS-4
Docket No. 23-ERDD-01
715 P Street
Sacramento, California 95814-5512

Delivered via email to: docket@energy.ca.gov

RE: Funding to Advance the Environmental Sustainability of the Clean Energy Transition (Enviro-SET)

Defenders of Wildlife (Defenders) respectfully submits these comments on the December 13, 2023 Workshop on funding to advance the environmental sustainability of the clean energy transition. Defenders is dedicated to protecting all wild animals and plants in their natural communities and has 2.1 million members and supporters in the United States, 316,000 of whom reside in California. We employ science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions to prevent the extinction of species, associated loss of biological diversity and habitat alteration and destruction.

We strongly support the development of renewable energy production. A low-carbon energy future is critical for California's economy, communities, and environment. Achieving this future—and *how* we achieve it—is critical for protecting California's internationally treasured wildlife, landscapes and diverse habitats. We believe transitioning to a renewable energy future need not exacerbate the ongoing extinction crisis by thoughtfully planning projects while protecting habitat critical to species.

Comments

Over the past decade, the accelerated development of renewable energy generation projects has permanently converted thousands of acres of natural lands and destroyed habitat for numerous special status species. Meeting California's clean energy goals will require as much as a million more acres of development. We can and must be better at protecting our natural lands and the wildlife that depends on them while meeting our clean energy goals. Consideration and protection of natural resources must be inherent in the transition to clean energy. The proposed funding program could provide much-

needed insights into both the effects of the past decade of renewable energy development and pathways to a more environmentally sustainable future. We offer the following comments and recommendations:

Research Background Group 1: Automated mapping of solar energy development footprints and modeling land suitability for dual-use purposes

Utility scale renewable energy development has resulted in one of the largest conversions of natural and grazing lands to an industrial use in our lifetime. SB 100 planning needs accurate, up-to-date maps of **both** solar and wind energy project footprints to allow for a clear understanding of how much land has been and is being developed, where the development is occurring, and the environmental and non-energy benefit implications of this development. This information is needed to inform energy and transmission planning and is fundamental to landscape conservation planning, such as 30x30 (Senate Bill 337; Executive Order N-82-20). The information is also needed for cumulative impact analysis under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). CEQA and NEPA documents consistently fail to adequately consider the cumulative impacts of utility scale solar and wind projects in the California desert and San Joaquin Valley. Up-to-date solar and wind project footprint mapping will simplify the preparation and review of cumulative impact analysis.

We welcome the exploration of dual use strategies to optimize suitable lands such as the built environment (e.g., warehouses, highways, aqueducts, and brownfields) and to explore colocation on highly modified farmlands such as irrigated row crops, rice fields, and vineyards. However, agrivoltaics must not include utility scale solar development of undeveloped grazing lands. Grazing lands provide valuable carbon sink benefits and should not be considered for development.¹ Some utility scale solar projects proposed on intact grazing lands are greenwashing as agrivoltaics by including nominal livestock grazing.² This research program should not support this conversion of intact lands to an industrial use.

Finally, any mapping program must be fully funded to support ongoing updates, or the information will become rapidly outdated. We look forward to hearing more about the implementation and funding of this initiative.

Research Background Group 2: Assessing and minimizing environmental and biological resource impacts of clean energy deployments

Independent Science

Renewable energy project developers have been generating a substantial amount of biological data as part of their advocacy and compliance with environmental regulations. While this data is interesting,

¹ [Hidden In Plain Sight: California's Native Habitats Are Valuable Carbon Sinks](#). Yap, T., Prabhala, A., Anderson, I. Center for Biological Diversity. July 2023.

² See the proposed [Coyote Creek Agrivoltaic Ranch](#) project located on oak woodlands and grasslands in Sacramento County.

there is a growing need for independent science to evaluate the impacts and benefits of renewable energy development on species and their habitats including impartial analysis of if and how species utilize lands developed with utility scale solar and wind projects. Independent research would be particularly valuable for two key species – San Joaquin kit fox and Swainson's hawks – to learn more about how they are impacted or benefited by solar projects.

Analysis of renewable energy development and species connectivity

Over the past decade, renewable energy projects have been developed on swaths of California's desert and San Joaquin Valley. Future utility scale renewable energy development is anticipated to require up to an additional million acres in California. The intensive nature of solar projects and their accompanying security fencing can fragment the landscape and impede connectivity for wildlife. The renewable energy footprint mapping should be overlain with the California Department of Fish and Wildlife's ACE Terrestrial Connectivity data³ to evaluate what connectivity has been lost and what remains to support conservation planning, the implementation of 30x30, and Goal B of the California Climate Adaptation Strategy.⁴

Cumulative Impact Analysis

The desert and the San Joaquin Valley regions have seen substantial renewable energy, housing, and light industrial development in the past decade. The cumulative impact analyses in CEQA and NEPA documents for these projects has been underwhelming at best and has myopically focused on immediate locales and a limited range of projects. Regional cumulative impact analysis of renewable energy development combined with other large scale project development such as housing and distribution/warehousing centers in the desert and San Joaquin Valley regions would provide a much needed baseline to inform how to sustainably plan for the future of these regions.

Up-to-date and ongoing tracking of compensatory mitigation resulting from renewable energy development

Renewable energy development has converted thousands of acres of natural lands. This development has required untold thousands of acres of compensatory mitigation. While the protected lands database⁵ can tell us where conservation easements and conservation lands are located, we are unaware of a centralized database of what, where, and how compensatory mitigation for renewable energy projects has occurred. This information is needed to understand the conservation implications of renewable energy development and will benefit the implementation of 30x30 and Goal B of the California Climate Adaptation Strategy.

³ <https://wildlife.ca.gov/Data/Analysis>

⁴ <https://www.climate-resilience.ca.gov/priorities/natural-systems/establish-refugia.html>

⁵ <https://www.calands.org/>

Conclusion

Studies have shown we can meet our clean energy goals while meeting natural resource protection goals and that this approach increases project viability while being cost effective.⁶ The envisioned research funding will further California's ability to do both. We thank the Workshop presenters for the informative discussion.

We look forward to the upcoming grant funding and hope to see it benefit the protection of natural resources while California makes its clean energy transition. Please contact Pamela Flick at (916) 442-5746 or pflick@defenders.org or Kate Kelly at (530) 902-1615 or kate@kgconsulting.net with any questions.

Sincerely,



Pamela Flick
California Program Director



Kate Kelly
Consultant

⁶ Wu, G. C., Jones, R. M., Leslie, E., Williams, J. H., Pascale, A., Brand, E., Parker, S. S., Cohen, B. S., Fargione, J., Souder, J., Batres, M., Gleason, M., Schindel, M., & Stanley, C. K. (2023). Minimizing habitat conflicts in meeting net-zero energy targets in the western United States. *Proceedings of the National Academy of Sciences of the United States of America*, 120(4). <https://doi.org/10.1073/pnas.2204098120>