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Additional submitted attachment is included below.



California Program Office

P.O. Box 401, Folsom, California 95763 | 916-313-5800

www.defenders.org

February 6, 2024

California Energy Commission

Docket Unit - MS-4

715 P Street

Sacramento, California 95814

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

RE: Proposed 2023 Integrated Energy Policy Report (Docket Number 23-IEPR-01)

Dear Commissioners:

This comment letter is submitted by Defenders of Wildlife (Defenders) on behalf of its 2.1 million members in the U.S., including over 316,000 in California. Defenders has a long history of advocating for generating and transmitting electricity from renewable energy sources with the least environmental impact. Achieving 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, productive farmlands, and diverse habitats.

We appreciate the Commission and staff's work in this Integrated Energy Policy Report (IEPR) proceeding and attention to comments received on the draft IEPR Report. We offer the following comments on ***Problem 5: Permitting is Slow and the Scale of Deployment Will Need Public Engagement Outside of Formal Permitting Processes.***

1) Coordination with Tribal Governments (Recommendation #2)

The "Perspective of California Native American tribes" panel during the February 1, 2024 Senate Bill 100 (SB 100) Report Land Use Workshop made it abundantly clear that coordination and consultation with California Native American tribes is not occurring early enough and consistently enough in not

just energy siting but importantly in clean energy policy making and planning. Tribal coordination and consultation must be incorporated into policy and planning proceedings such as IEPR, SB 100, the California Public Utility Commission's Integrated Resources Planning, and the California Independent System Operator's Transmission Planning Process to provide a path for a truly just clean energy transition that protects natural and cultural resources. We request the Joint Agencies work with the tribal community to develop and implement an avenue for such coordination and consultation.

2) Geospatial Mapping Tools (Recommendation #5)

We appreciate and strongly support the continued improvement and development of web-based geospatial mapping tools being made a standalone recommendation. The importance of these tools cannot be overemphasized when planning for an equitable clean energy future that balances generation, transmission, and the protection of natural and cultural resources.

Finally, we appreciate and strongly agree with the discussion on page 57 of the proposed IEPR Report on the importance of environmental analysis and permitting processes. The very basis of the California Environmental Quality Act was and is to enable informed decision-making. The proposed IEPR Report correctly notes that public engagement "... can result in helpful project requirements and may lead to increased community buy-in" and "... a lack of engagement may increase opposition and delay progress on clean resource and infrastructure deployment."

Thank you for the opportunity to comment on the draft 2023 IEPR. 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.

Respectfully,



Pamela Flick
California Program Director



Kate Kelly
Consultant