



October 29, 2013

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 13-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED
13-IEP-1A

TN 72278

OCT. 28 2013

Delivered via email to: docket@energy.ca.gov and
Stephanie.Bailey@energy.ca.gov

RE: Docket No. 13-IEP-1A
Draft 2013 Integrated Energy Policy Report

Dear Commissioners:

Thank you for the opportunity to comment on the Draft 2013 Integrated Energy Policy Report (Draft 2013 IPER). These comments are submitted on behalf of Defenders of Wildlife (Defenders) and our more than one million members and supporters in the United States, 200,000 of which reside in California.

Defenders is dedicated to protecting all wild animals and plants in their natural communities. To that end, Defenders employs science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions in order to prevent the extinction of species, associated loss of biological diversity, and habitat alteration and destruction.

Defenders strongly supports the emission reduction goals found in the Global Warming Solutions Act of 2006 (AB 32), including the development of renewable energy in California. However, we urge that in seeking to meet our renewable energy portfolio standard in California, that renewable energy projects be designed, sited and permitted in a manner which results in the most sustainable, low impact outcomes possible. This is essential to ensure that project approval moves forward expeditiously and in a manner that does not sacrifice our fragile landscapes, prime agricultural lands and wildlife in the rush to meet our renewable energy goals.

As we transition toward a clean energy future, it is imperative for our future and the future of our wild places and wildlife that we strike a balance between addressing the near term impact of industrial-scale solar development with the long-term impacts of climate change on our biological diversity, fish and wildlife habitat, natural landscapes, and productive prime agricultural lands. To ensure that the proper balance is achieved, we need smart planning for renewable power that avoids and

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minimizes adverse impacts on wildlife and lands with known high-resource values.

Defenders has been actively working on renewable energy and transmission policy and siting issues in both throughout California. Our 2012 *Smart from the Start: Responsible Renewable Energy Development in the Southern San Joaquin Valley* report (referenced on page 53 on the 2012 IPER Update) focused on incentivizing the siting of renewable energy projects in low-conflict areas and on impaired agricultural lands with low habitat value as an important strategy for accelerating renewable energy development and protecting vital natural resources. Although the Report is focused on the southern San Joaquin Valley, the observations and recommendations can be broadly applied to renewable energy development throughout California. There is an urgent need for comprehensive land use and environmental planning for renewable energy development. Identifying preferred geographic areas for renewable development and establishing renewable energy combining zoning districts supported with programmatic CEQA documents would profoundly facilitate Smart from the Start, strategic renewable energy and transmission development.

Defenders strongly supports the Commission's recommendations for coordinating land use and transmission planning efforts (pp. 111 – 116 of the Draft 2013 IPER). These actions would facilitate smart, strategic renewable energy and transmission development. It is essential that preferred development areas for renewable energy development be identified and then transmission be planned to serve those areas. The current model of developing renewable energy based upon where transmission is available results in unsynchronized development that unnecessarily impacts our high value environmental resources.

Defenders recommends the following:

- Implement comprehensive regional planning and mapping to identify the locations and siting criteria that are most appropriate for renewable-energy development based on energy resources, biological resources, agricultural lands, cultural resources and land uses.
- Identify “energysheds”—areas at a regional or county level that have renewable-energy resources and the appropriate land, environmental characteristics and other resources with the highest potential for effective smart-from-the-start renewable-energy development.
- Adopt energy elements in local jurisdictions’ general plans that are based on the regional planning and identification of energysheds.
- Establish renewable energy combining or overlay zoning districts or siting criteria to incentivize smart-from-the-start renewable-energy development.
- Plan future transmission lines and systems to serve identified energysheds, incentivizing and facilitating smart-from-the-start renewable-energy siting.
- Establish regional coordination among transmission authorities to avoid duplicative infrastructure.

Priority for siting future renewable energy facilities must be based upon comprehensive, sustainable land use and environmental planning principals and not just the expediency of siting near existing or planned transmission. Future transmission must be planned to serve those areas which provide Smart from the Start siting for renewable energy development.

The ongoing effort to create the Desert Renewable Energy Conservation Plan (DRECP) is a good example of an effort to integrate transmission planning, renewable energy development focus areas, and natural resource conservation. While Defenders' highlights the DRECP as a possible good example of how to integrate these three goals/outcomes, we are not proposing that the transmission planning rise to the level of a state Natural Community Conservation Plan. However, the effort to create the DRECP has provided some good lessons that the CEC should consider:

1. It is essential to have comprehensive, uniform data about biological resources and land uses/designations.
2. The counties and other land use planning entities need to be included early into the process.
3. A strong conservation strategy for biological resources will increase the likelihood that areas identified for transmission and development will have less conflict associated with them.

Finally, OPR is the State's comprehensive planning agency. The land use and environmental planning components of the IEPR must be closely coordinated with OPR and OPR should take the lead role whenever possible.

Thank you once again for the opportunity to provide comments on the Draft 2013 IEPR Update program and for considering our comments. If you have any questions, please contact me at (916) 313-5800 x109 or via email at kdelfino@defenders.org.

Respectfully submitted,



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California Program Director