

August 19, 2014

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

RE: Comments to the Lead Commissioner Workshop on Integrating Environmental Information in Renewable Energy Planning Processes (08-05-14)
Docket Number 14-IEP-1C

Dear California Energy Commissioners,

In response to the California Energy Commission's Lead Commissioner Workshop on Integrating Environmental Information in Renewable Energy Planning Processes (August 5, 2014), Defenders of Wildlife is submitting recommendations regarding the integration and utilization of environmental information in land-use planning processes for renewable energy. These recommendations are based on presentations and information resulting from a symposium on Landscape-scale Planning for Renewable Energy and Conservation that was organized by Defenders for the North America Congress for Conservation Biology held in July 2014. This letter is in addition to the joint letter sent today in collaboration with The Nature Conservancy, Natural Resources Defense Council, and Sierra Club.

**Introduction**

Defenders of Wildlife would like to thank you for the opportunity to provide input to the workshop and the 2014 Integrated Energy and Policy Report ("IEPR"). 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 species extinction, biodiversity loss, and habitat alteration & destruction.

Defenders strongly supports the development of renewable energy in California. Integrating environmental information into renewable energy planning is essential to ensure that development of renewable energy moves forward expeditiously and in a manner that does not sacrifice our fragile landscapes and wildlife in the rush to meet our renewable energy goals.

We support the CEC, California Public Utilities Commission (CPUC) and California Independent System Operator (CAISO) incorporating environmental information into their decision-making processes. We also support making project and transmission decisions based upon environmental information and consistent with planning efforts such as the Desert Renewable Energy Conservation Plan (DRECP).

Landscape-scale renewable energy planning is one step in determining appropriate areas for renewable energy development within California. This approach was recommended in the 2012 IEPR (p. 53). Here we offer specific recommendations regarding the integration of scientific information into landscape-scale renewable energy planning. Our comments focus on the following principles:

- Importance of scale
- Use best available & most relevant data
- Transparent data access and use
- Transparent decision making throughout the planning process
- Adaptive management framework
- Local agency input & control

**Principles for Landscape-scale Planning for Renewable Energy**

***Importance of Scale***

Scale matters when undertaking landscape-scale analyses of any nature. Specifically, regions that are relevant and appropriate for renewable energy planning should be determined by a multitude of factors such as: solar insolation, solar potential, land uses, social and cultural values, climatic zones, biological resources, ecological boundaries, and administrative boundaries. Having each of these factors included and considered will yield regions for analyses that are at the appropriate and relevant scale for development, conservation, and other existing uses of the landscape.

***Best Available & Most Relevant Data***

The inclusion of environmental information and spatially explicit data that has been verified, ground-truthed, and maintained for decades is preferred for renewable energy planning. Planning processes with clearly and explicitly stated goals and objectives will be able to determine which data is most relevant. High quality data is unlikely to be available for all portions of the state. For each region that will be analyzed, the data that is used in the analysis should be recent, peer reviewed, and shown to be accurate at the site scale.

***Transparent Data Access and Use***

To ensure that all vested stakeholders in a region have access to data that will be used in regional analyses, state agencies should use an open source program for representing and storing data. For example, DataBasin, developed and maintained by the Conservation Biology Institute, has been instrumental in creating data transparency for the DRECP. It provides a cyberspace where individuals can work together to use data for decision making, analysis and collaboration. Increased transparency in the renewable energy planning process allows stakeholders to more fully understand how environmental information is being used to make land use and energy-related decisions.

***Transparent Decision-Making throughout the Planning Process***

Planning processes that will have a large impact on the landscape, wildlife, and humans such as renewable energy planning should be transparent in all regards to convey trust to stakeholders within a region. Using DataBasin is one way to ensure that all stakeholders have access to data and information, but it is also necessary to provide opportunities for public comment and engagement with the agency process. Actively seeking stakeholder engagement will create ownership of the planning process by all stakeholders, and remove some of the distrust that can result from large-scale planning processes.

***Adaptive Management Framework***

Providing mechanisms that allow for adaptive management are essential to large planning processes, especially with the impacts from utility-scale renewable energy development, many of which are not fully understood. Adaptive management needs to be well-designed and guided by clear goals and objectives related to the environmental information for a region. The framework that will guide adaptive management should again be transparent, involve a multitude of stakeholders, and be based upon the best available science and data.

***Local Agency Input***

At the August 5 workshop, the CEC heard from several local counties that are conducting planning processes for renewable energy development within their jurisdiction. As was clearly stated by all counties, planning also must occur at the local scale. Local agencies have knowledge that can't always be translated into data layers, but is valuable input to the planning process. Providing mechanisms for local agencies to have input in the larger planning processes will create more local buy-in for planning processes, more local ownership of the issue, and ultimately stronger, more effective plans.

**Conclusion**

For California to responsibly meet its greenhouse gas (GHG) emission targets and continue to decarbonize the energy sector without unnecessarily sacrificing its remaining pristine lands and valuable habitat for plants and animals, it is essential that environmental information be integrated into renewable energy planning in an effective manner. Taking into consideration and utilizing the above principles will assist the CEC in designing landscape-scale plans that effectively integrate environmental information and result in an approach to renewable energy planning that will avoid adverse impacts to wildlife, landscapes, and humans.

Defenders strongly supports efforts to include environmental information into renewable energy planning, such as the DRECP and encourages the CEC to approach all renewable energy planning with environmental information integrated into its planning efforts. Thank you again for the opportunity to provide public comment. We look forward to continuing work with you as California pushes forward towards meeting aggressive and critical GHG reductions.

Respectfully Submitted,

Stephanie Dashiell
California Representative
Defenders of Wildlife