



October 24, 2012

California Energy Commission
Dockets Office, MS-4
Re: Docket # 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

Submitted via email to: docket@energy.ca.gov
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RE: Support letter for the Environmental Protection Agency's California Mapping Tool for Developing Renewable Energy Resources

Dear Commissioners:

Defenders of Wildlife ("Defenders"), the Sierra Club and The Wildlands Conservancy ("TWC") are writing to express our strong support for the newly released *Mapping Tool for Siting Renewable Energy Resources on Contaminated Lands* that has been developed by the Environmental Protection Agency (EPA) in partnership with the National Renewable Energy Laboratory (NREL).

Defenders is a national nonprofit organization with over 1 million members that 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.

The Sierra Club is a national nonprofit organization of approximately 1.3 million members and supporters (about 250,000 of whom live in California) dedicated to exploring, enjoying and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth's ecosystems and resources; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. The Sierra Club's concerns encompass protecting our public lands, wildlife, air and water while at the same time rapidly increasing our use of renewable energy to reduce global warming.

The Wildlands Conservancy (TWC) is a California non-profit public benefit corporation with the dual mission to preserve the beauty and biodiversity of the earth and to fund outdoor education

programs for the youth. TWC has preserved more land in California with private funds than any other conservation organization and owns the largest nonprofit preserve system in CA. TWC strongly supports renewable energy production and utilization in California while protecting its unique and sensitive resources including, in particular, the California Desert Conservation Area (CDCA). TWC raised \$45 million in private funds to put towards the purchase and donation (Catellus) of approximately 630,000 acres of checker-boarded land in the CA deserts, rich in cultural and natural resource values. TWC has a vested interest in renewable energy development being proposed on federal lands within the California desert region.

Our organizations strongly support 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, 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 and wildlife in the rush to meet our renewable energy goals.

The EPA, with its RE-Powering America's Lands Initiative¹, is working to assist in the siting of solar, wind, geothermal and biomass facilities on landfills, hazardous waste sites, abandoned mine fields, and other disturbed and degraded lands that may have low value as wildlife habitat. The program has inventoried and mapped² thousands of potentially contaminated land and mine sites across the country and estimated their renewable energy potential; has produced best practice reports and handbooks³ on siting renewable energy projects on these types of lands; has published solar and wind decision trees⁴ to help planning organizations determine the best potential locations for renewable energy on degraded lands in their communities; and has helped property owners and communities understand liability concerns and redevelopment options for these sites. They have analyzed both the technical potential for renewable energy development and the more realistic potential for development in states that have Renewable Portfolio Standards to drive demand, such as California. The initiative has looked across many types of renewable energy: both utility- and community-scale wind, off-grid wind and solar, concentrating and PV solar, biopower, various geothermal technologies, and landfill gas.

Building upon the national effort, the Pacific Southwest Region of the EPA (Region 9) has included additional sites in California and has used a screening tool that filters and selects prime sites for utility-scale renewable energy development⁵. The program has developed priority lists and maps of the top 75 of over 11,000 tracked sites in the state, providing a road map to the best places for producing wildlife-friendly renewable energy. Within the Desert Renewable Energy Conservation Plan (DRECP) area, EPA identified 17 priority sites with acreage greater than 500 acres with a total combined acreage of 54,000 acres of abandoned mine sites, Federal Superfund sites, landfills and

¹ EPA's REpowering America's Lands Program website: <http://www.epa.gov/oswercpa/>

² Data and maps can be found at <http://www.epa.gov/oswercpa/data.htm> and <http://www.epa.gov/oswercpa/maps.htm>, respectively.

³ For Best Practices and Handbook on Siting Renewable Energy, see: http://www.epa.gov/oswercpa/develop_potential_fs.htm

⁴ Solar and Wind decision trees can be found at: http://www.epa.gov/oswercpa/docs/solar_decision_tree.pdf and http://www.epa.gov/oswercpa/docs/wind_decision_tree.pdf, respectively.

⁵ EPA's California renewable energy siting tool website: <http://www.epa.gov/region9/climatechange/renewcontlands/index.html>

RCRA sites. All sites are accompanied by detailed information including their acreage, suitability for various renewable technologies and estimated power output.

In sum, the EPA has produced a tremendous resource to help site renewable energy on disturbed and degraded lands, and we are eager to see it be put to use in California. We strongly encourage the CEC to incorporate the excellent information the EPA has gathered and organized into policies and programs that promote efficient deployment of sustainable renewable energy that results in the least impact on our state's species, habitats and ecosystems. In particular, we would like to discuss how the EPA-identified sites in the California deserts can be incorporated into the Development Focus Areas (DFAs) for the DRECP, as siting in these locations greatly reduces impacts to covered species, natural communities and ecological processes, thus furthering the planning goals of the DRECP.

We invite further conversation with the DRECP and more broadly with the CEC on how to effectively use the information that the EPA has generated in support of renewable energy siting on already disturbed or degraded lands. To that end, we suggest that the CEC host a short public workshop in November in which the EPA can share information, data and resources with the CEC commissioners and staff, renewable energy industry leaders and utilities. We look forward to working with the CEC to implement this workshop.

Thank you for your continued dedication to issues surrounding the development and deployment of renewable energy resources in California. To discuss and coordinate a public workshop on the EPA's siting tool for renewable energy on contaminated lands in California, please contact Stephanie Dashiell at (760) 366-3481 or email sdashiell@defenders.org.

Sincerely,



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Defenders of Wildlife



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April Sall
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