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February 7, 2018

Local Development Business Plan Team
East Bay Community Energy
1111 Broadway, 3rd Floor
Oakland, CA 94607

RE: Comments on East Bay Community Energy's Draft Analysis of Locational Benefit Factors Chapter of the Local Development Business Plan

Dear East Bay Community Energy's Local Development Business Plan Team:

On behalf of The Sierra Club, The Nature Conservancy, and Defenders of Wildlife, thank you for the opportunity to comment on the East Bay Community Energy (EBCE) Local Development Business Plan. We appreciate your leadership in proactively incorporating land use impacts in your Plan as part of the Analysis of Locational Benefit Factors chapter. Our organizations strongly support incorporating land use considerations into energy planning and procurement to protect the important lands and waters on which life depends and to reduce renewable energy project development risk. In this spirit, we offer our input and collaboration in finding the best data to support you in your goal of providing clean and green energy to your customers in Alameda County.

In addition to solar and wind resources, Alameda County hosts a wealth of conservation values. Its vast geography hosts a high concentration of threatened, endangered and sensitive species, rich habitats, wetlands, streams and creeks, baylands, farmland and rangeland. State, federal and non-governmental conservation organizations have invested millions of dollars in protecting and enhancing these important habitats, lands and waters and working lands. In particular, Eastern Alameda County developed the [East Alameda County Conservation Strategy](#) which assists agencies in understanding and integrating complex ecological data into the permitting process.

The Land Impact section on the Analysis of Locational Benefit Factors Chapter states that installing 10 MW of local PV on the built environment would avoid impacts to 75 acres of land. Taken cumulatively, this avoided conversion represents substantial conservation of open space. Natural and agricultural lands in open space provide myriad benefits to local communities such as the provisioning of clean water, flood risk reduction, protection from sea-level rise, recreation opportunities and climate change mitigation through carbon sequestration. As EBCE plans and procures clean and zero-carbon resources to serve its customers, we encourage consideration for natural and agricultural lands in your methods. Prioritizing

local resources (energy efficiency, energy storage, distributed generation) provides the benefit of avoided conversion, as demonstrated in the Land Impact section of the Analysis. Should EBCE plan to procure community-scale or utility-scale solar PV or wind, we encourage energy procurement decisions that avoid and minimize impacts to natural and agricultural lands.

The Nature Conservancy and partners¹ recently launched the [Bay Area Greenprint](#), a web-based tool that reveals the multiple benefits of natural and agricultural lands. This tool identifies, maps, and measures natural and agricultural resources and communicates their contribution to the local and regional community. The tool's reporting feature provides easily accessible and interpretable information that enables clear communication with stakeholders about tradeoffs in land use planning.

Users can quickly identify an area of interest by drawing it on a map, uploading a file or selecting a pre-loaded report (such as counties like Alameda County, cities or watersheds). The Bay Area Greenprint then issues an online report within seconds that can be downloaded as a pdf, an Excel spreadsheet or a shape file with the conservation values identified. Standardized reporting in the Bay Area Greenprint includes:

- Carbon storage for climate change mitigation
- Water yield
- Water quality
- Water hazard risk reduction
- Regional Trails and Outdoor recreation
- Food production
- Prioritized habitats
- Habitat connectivity
- Species and habitats that might require mitigation
- Climate change impacts and adaptation opportunities

It also includes general information on the area of interest, including adopted conservation policies, locations of Priority Conservation Areas and a list of potential development projects.

The goal of the Greenprint is to provide conservation information and analysis in an easy to use and interpretable manner, aggregating the wealth of conservation data in the Bay Area into one tool for users to incorporate conservation early into plans and projects. We developed the tool with our target audience in mind: infrastructure agencies (energy, transportation and water), land use planners, developers and conservation organizations. To that end, use of the Greenprint is free, the data and methods are transparent and accessible. We hope that use of the Greenprint will result in sustainable land use decisions that support conservation priorities and provide guidance to infrastructure agencies and developers that will reduce risk for their projects.

The [Bay Area Greenprint](#) is well-positioned to be a useful tool for EBCE. For example, EBCE could screen potential sites for solar development through the Greenprint to understand areas that are rich in other types of natural resources. This could alert EBCE and developers to potential risks and provide a more comprehensive assessment of the benefits to the community from avoided conversion². Using a

¹ American Farmland Trust, Bay Area Open Space Council, Greenbelt Alliance, and GreenInfo Network

² In addition to assessing the benefits of distributed generation from avoided conversion, the Greenprint could be used to support due diligence of particular projects. Considering project siting and permitting in due diligence is important because these criteria

standardized and accessible accounting of the benefits from natural and agricultural resources can build stronger support for EBCE's goals and recommendations.

Once again, thank you for the opportunity to comment. We support the inclusion of land use impacts as part of EBCE's Local Development Business Plan. We would be happy to meet with EBCE to explore the utility of the [Bay Area Greenprint](#) for assessing the benefits of avoided conversion and the other features that could support EBCE in future siting and planning of renewable energy resources.

Sincerely,



Erica Brand
California Energy Director
The Nature Conservancy
ebrand@tnc.org



Liz O'Donoghue
Infrastructure and Land Use Director
The Nature Conservancy
eodonoghue@tnc.org



Luis Amezcua
Sierra Club
lamezcua27@gmail.com



Kim Delfino
California Program Director
Defenders of Wildlife
kdelfino@defenders.org

cc. Community Advisory Committee (via Board Clerk Stephanie Cabrera)

improve the assessment of project and portfolio viability, as there is an important connection between siting decisions of a project developer and the ability to secure permits and complete a renewable energy generation project on-time and at stated capacity. "The IOUs have identified the permitting process for renewable generation as a barrier to meeting their RPS compliance requirements. Renewable developers, particularly those of wind and solar projects, face challenges related to farmland designation and Williamson Act contracts, tribal and cultural resources areas, and protected species. The uncertainty surrounding the availability and timely issuance of necessary permits creates downstream development risks for renewable project development including: scheduling challenges and corresponding problems with site control, financing, permitting, engineering, procurement and construction (EPC) contracts and supplier contracts." California Public Utilities Commission (2016) Biennial RPS Program Update, p. 23, available at http://www.cpuc.ca.gov/uploadedFiles/CPUC_Website/Content/Utilities_and_Industries/Energy/Reports_and_White_Papers/FINAL12302015Section913_6Report.pdf.