



<b>DOCKET</b>
<b>09-RENEW EO-1</b>
DATE _____
RECD. <u>MAR 30 2009</u>

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 09-Renew EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

BY EMAIL TO: [docket@energy.state.ca.us](mailto:docket@energy.state.ca.us) - ORIGINAL BY MAIL

Re: Docket No. 09-Renew EO-01 "Renewable Energy Executive Order"

Ladies and Gentlemen:

These are follow-up comments on the Renewable Energy Executive Order on behalf of the California/Nevada Desert Energy Committee of the Sierra Club.

We would like to thank the California Energy Commission for the opportunity to provide input to the California Desert Renewable Energy Conservation Plan (CDRECP) process. We do want to reiterate our concern about the proposal to expedite the permitting process for renewable energy projects in advance of completing the Governor's proposed Natural Communities Conservation Plan (NCCP).

As we understand it, the purpose of the NCCP is to identify, assess and protect the natural communities at risk from large-scale deployment of renewable energy projects across the California desert. To expedite permitting on natural lands in the interim would be to undermine the NCCP before it is started. As stated at the hearing, we believe these two actions are mutually exclusive.

However, we do strongly recommend that it would be appropriate to give preferential treatment (such as expediting permitting), for those projects whose proponents have had the foresight to site their projects on disturbed lands. By disturbed lands, we mean lands that have been graded, mined or farmed (not merely grazed).

It is important to emphasize that when we speak of disturbed lands we do **not** mean lands that have been merely grazed. Vast stretches of the California desert have been grazed at one time or another in the past. Livestock grazing's impacts to wildlife are surely significant, but the land can recover from grazing over time. For example, park quality land such as Joshua Tree National Park or Mojave National Preserve was grazed in the past. The impacts of grazing livestock on the land simply do not rise to the level of obliterating the land's



natural, biological, scenic or cultural values as do the impacts of consumptive uses such as farming, mining and the like.

We also asserted at the hearing, and hereby reiterate, that the California Department of Conservation's mapping of farmland is not current, and should not be the measure of prime farmland until it is updated. Many formerly farmed areas, both within and outside of the desert, have been dewatered or otherwise polluted or depleted, but this fact is not reflected on the Department's maps. We strongly recommend marginal and abandoned ag lands as appropriate sites in the state for locating renewable energy projects, especially solar projects.

Unfortunately the Renewable Energy Transmission Initiative (RETI) failed to identify the full complement of available disturbed lands. This was because all farmlands, even abandoned or marginal farm lands, were excluded from consideration as "disturbed lands." Therefore, RETI only identified a tiny fraction of disturbed lands, and failed to consider abandoned and marginal ag land, which is the most abundant class of lands that are environmentally suitable for renewable energy siting.

Thank you again for the opportunity to comment on the Governor's Executive Order and CDRECP.

Very truly yours,

A handwritten signature in black ink that reads "Joan Taylor". The signature is written in a cursive, flowing style.

Joan Taylor, Chair  
CNRCC Desert Energy Committee, Sierra Club  
1850 Smoke Tree Lane  
Palm Springs, CA 92264