California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us

DOCKET
09-RENEW EO-1
DATE
RECD. SEP 10 2010

Re: Comments on the Independent Science Advisors Report, docket number 09-RENEW EO-01

Ladies and Gentlemen:

Please accept the following comments on the Independent Science Advisors Report, docket number 09-RENEW EO-01.

The Desert Renewable Energy Conservation Plan ("DRECP" or "the Plan") is an unprecedented effort. Habitat planning for tens of millions of acres in a few years time is a tall order. The REAT is to be commended for assembling some of the most respected desert biologists to advise the Plan re the principles that need to be followed to ensure a biologically defensible habitat plan. In sum, the *Draft Recommendations of Independent Science Advisors for The California Desert Renewable Energy Conservation Plan,* (hereinafter "the Recommendations") is an excellent set of guidelines and should be followed in its entirety. These comments will just touch on a few areas of interest.

Data Gaps - Baseline Mapping

First, the Recommendations call out the urgent need for adequate baseline mapping, calling it a "critical information gap" (p. 47). Although there have been sporadic federal, state and private mapping efforts in the California desert over the years, there has been no one consistent protocol for these efforts. Hence the Recommendations make it abundantly clear at 48 and elsewhere that, with few exceptions, existing maps (and the modeling built on them) are incomplete and inadequate for the DRECP to use for baseline information as to habitats, species, movement corridors, ecosystem processes, etc.

Comment/question: the Recommendations call out the need for improved mapping for the West Mojave and Owens Lake areas in particular. How much is this recommendation based on the threat of renewable development, and how much on inadequacy of mapping as compared to other areas? If the recommendation is based on development threat, then I would recommend the Advisors request and review full information on renewable energy applications for the entire desert. For

instance, although prior Los Angeles DWP management proposed Owens Lake for potential massive PV development to stabilize the dry lakebed, it is unclear whether new management is implementing the pilot project needed to determine suitability of PV for lakebed stabilization. On the other hand, eastern Riverside County has tens of thousands of acres of solar proposals, many of them likely to be permitted in the near term, plus abundant proposed and approved new transmission capacity to serve this development. Have threatened areas such as this been adequately mapped?

The question of funding has arisen in the Recommendations, as well as during Stakeholders meetings. To date, no estimate of funding to complete the recommended full vegetation mapping has been made public. However, good baseline maps are the basis for all decisions in the Plan, as well as future adaptive management. In fact, good baseline biological maps are the *sine qua non* of habitat planning. For comparison, the Western Riverside County HCP spent half a million dollars on veg maps for its plan, which only covers a small fraction of land of the DRECP. This begs the question: what level of funding is appropriate (and indeed obligated) to adequately map this, far larger and far more impactful effort? What level of funding is being allocated for environmental and other consultants? What is the most important expenditure? The issue of funding for baseline maps needs to be fully aired and re-visited.[1]

In sum, the Recommendations are unequivocal on the absolute need for a complete and integrated veg map at a level of detail necessary to determine the full range of habitats and species. Timely funding and implementation of this recommendation is essential to the integrity of the Plan.

Conservation/ Reserve Design Principles

The Recommendations repeatedly advise that the reserve design should accommodate not only today's species needs, but also likely future needs brought on by climate change: "Conservation designs based on a concept of ecological stasis, either with respect to species distributions or community associations, are therefore doomed to fail in the long term"(p. 39). Indeed, the heat and drought stressors existing today are likely to be greater tomorrow. Modeling, as accepted by peer review, will be helpful in

---

[1] The Recommendations do outline an interim mapping strategy, but with a very strong caveat: "However, it is important to recognize that such an interim, mid-scale map is a compromise and should not be considered a final product: We believe that a comprehensive, fine-scale, alliance-level vegetation map supported by rigorous field data collection over multiple years and a formal accuracy assessment per CDFG protocols, should be completed as soon as possible" p. 48.

determining future needs, but the Recommendation is: "Maintaining or improving landscape-level linkages that meet the niche requirements of all covered communities and species should be a key focus of DRECP. " (p. 40) The Recommendations are detailed in this regard, that landscape level linkages are critical to an adequate Plan.

Covered Species

The Recommendations presented a draft list of covered species for some species , with direction for assembling a complete list of covered plants, invertebrates, obtaining other expert input, etc. However, the boundaries of the DRECP are unclear, and may have changed since the draft Recommendations were formulated. If the DRECP boundaries are expanded in eastern San Diego County or elsewhere, the draft list should be revisited and expanded as appropriate.

Additionally, have the Advisors taken note of the number of new species/ narrow endemics being discovered in surveys for current projects, due both to the huge scale of development and the lack of prior surveys? What is the recommendation in this regard? This is a concern that does not appear to be covered by the proposed beg mapping.

Scope – Permit Duration for the DRECP

Again, the Recommendations are clear: the DRECP permit should not exceed a thirty year life. The reasoning behind this is sound, not only from a biological perspective as outlined in the Recommendations at 12, but also from a technological perspective. The covered actions identified today cannot reasonably predict technological changes in renewable energy, occurring at a geometric rate.

Additional Expert Input

Due to the unprecedented scope of the DRECP and the limited timeframe for their report, the Advisors recommend obtaining further independent scientific input for various aspects of the Plan. This is wise, and had already been the subject of discussion in earlier Stakeholder meetings, with concurrence by the Director. Other, well-respected habitat plans, such as the Coachella Valley MSHCP, have enlisted independent experts to ensure scientific validity of the plan and broad public buy in.

Conservation Principles – Precautionary Principle

One of the overarching principles enunciated in the Recommendations was to use a "No Regrets" approach. This is also known as the Precautionary Principle. In the

face of the unprecedented size of the Plan, the ambitious timeline to completion, and the gaps in information compounded by the uncertainties of future climate change – the Advisors recommend that the DRECP be developed/implemented incrementally within an adaptive management framework. In the meantime the unequivocal recommendation is to site renewable development on already disturbed soils.

The California desert is a big place. It took a long time for it to reach its current condition, and today's development cannot be remediated for centuries, if ever. As outlined at the last Stakeholder's meeting, the REAT is gathering information on existing disturbed areas; this should inform implementation of the Advisors' unequivocal recommendation in this regard.

Thank you for the opportunity to participate in this critical effort.

Very truly yours,

Joan Taylor

Joan Taylor
Stakeholder,
Friends of the Desert Mountains