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Comments on the Desert Renewable Conservation Plan

Submitted by:

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I appreciate the opportunity to comment on the Desert Renewable Energy Conservation Plan. I am a California native, I grew up in the community of Joshua Tree, and returned to the desert after college. I currently manage the Whitewater Preserve for the Wildlands Conservancy near Palm Springs, California.

1. I would like to voice my support for the recommendations of the DRECP Independent Science Advisors (ISA) panel. I appreciate that we are building a process with the DRECP that is focused on the conservation of our natural resources.

a. What we have in the California Desert is irreplaceable. While I believe the Plan represents the best hope to date to balance renewable energy development with conservation across the California Desert, I am worried it will do little until it is finished to guide the current projects, which could be several more years. I encourage the permitting agencies to follow the suggestion of the ISA and adopt a "No Regrets" policy for current and new projects until the plan is finished. This policy should respect the intent of the DRECP to conserve our desert resources on a landscape level until the Plan can be implemented.

b. As for timelines with regard to Permit Term, calculation of acreages needed for the RPS, and other long range planning schedules, I think the plan should cover terms of not more than thirty years at a time. Because of the pace of changing technology in the renewable energy field, the ongoing effects of climate change on species distribution, and other unforeseeable factors, planning for more than a thirty year period will introduce too much future uncertainty and undermine the importance of reassessing ground conditions. Please follow the ISA panel recommendation that any permit issued have a duration of not more than thirty years, and that on the ground conditions, species distributions, and other pertinent conditions are re-assessed every ten years.

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2. I would also like to suggest that the panel find ways to incentivize the counties in the planning area to sign on to the permit. I believe incorporating county support is the single best way to maximize the participation of private lands throughout the planning area. Small and mid-scale projects placed on disturbed lands near load centers and existing transmission lines create less environmental impact, speeding up the permitting process, and directly benefiting the local communities in the area. The planning process for public lands incentivizes large scale projects, which are harder to fit on disturbed land near load centers.

Incentivizing

county participation in the DRECP will help create opportunities for these small to mid scale projects.

For those of us who live in the desert, the big, empty, pristine spaces of the California desert are some of the most important places on earth. I love my lifestyle and my community. Advancing solar development without damage to these amazing landscapes is of tremendous importance to me.

3. I would also like to suggest that the state create a clearing house, or nexus, for *all *ongoing renewable energy projects, be it power plants, transmission lines for carrying the power, or other new infrastructure necessary for renewable energy projects. A single master list would allow more transparency for the public to better understand the big picture of renewable energy development across the state. I was able to find a clear list created by the Solar Energy Industries Association of all projects, but would like to see the agencies handle this.