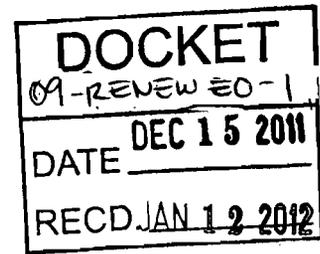


December 15, 2011

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



Ellen Schafhauser, Independent Biologist:
Comments on the Preliminary Conservation Strategy

As a biologist who is at present monitoring biological resources effected by construction and installation of wind and solar projects already in progress in the Mojave Desert, I am thankful for the collaborative work that has already been done by the DRECP Stakeholders to implement on future renewable resource projects.

I have attended the the November and December, 2011 DRECP meetings so as to educated myself and be able to contribute to the decision making that will forever change the American Deserts. In the relatively short time that wind and solar projects and their associated transmission lines have been in construction I have witnessed major destruction and fragmentation of Joshua tree woodland habitat.

I understand that The PSC map is at present not set in stone, I know from experience in some of the designated blue, "Low biological value" designated areas that a qualified biologist has not evaluated some of these areas for possible high-quality habitat.

Two specific habitats that I have personally witnessed major fragmentation due to wind turbine and transmission line construction are in the Mojave/Tehachapi area in Kern County. There are mature Joshua tree woodlands with trees that were, (well over 5000 Joshua trees were destroyed and removed due to the TRTP wind energy project) some estimated to be 400-500 years old, and in a density rarely seen in much of the Mojave. Also in this area north of the LA aqueduct and the southern slope foothills of the Tehachapi there are ancient Creosote Bush forests (12'-15' height bushes) that could very well have not been surveyed for creosote rings, (the oldest living thing on earth). I wish to submit that although Joshua trees are not considered on the endangered species list nor are mature Creosote Bush habitat, these are habitats that seriously need to be on the table as high-quality habitat for numerous species.

A concern that needs to be noted is that these two specific habitats are similar to the old growth forest of the Northwest. I submit that the flora and fauna that are associated with such old growth be considered as high-quality habitat.

I agree with the Center For Biological Diversity, in the Comments on the DRECP Preliminary Conservation Strategy Report.

"Table 2.1-1 (and FIGURE 2-1 DRECP Preliminary Conservation Strategy Map) refer to areas as "low biological value" when in fact these areas appear to include two types of lands: 1) areas where there is little/no data on the biological resources (at pg. 2-2) - likely private lands that have not had bio surveys done on them or results of surveys not available and 2) areas that have been type-converted to other uses and may indeed have low biological values. Parsing out these 2 very different types of area would be useful. If they continue to be lumped together, then the name should reflect low/unknown biological value."

Thank you for your time in considering my comments.

Submitted by: Ellen Schafhauser, Independent Biologist, PO Box 438, Weldon California, 93283