

August 8, 2012

California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
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SUBJECT: DRECP Alternative Scenarios and Transmission Assumptions of July 25, 2012

Thank you for the opportunity to comment on the July 25, 2012, renewable energy development alternatives and transmission assumptions of the Desert Renewable Energy Conservation Plan (DRECP). The California Desert Coalition (CDC) is a nonpartisan, issue advocacy group organized as a committee of The SummerTree Institute, a 501(c)(3) nonprofit corporation.

CDC supports renewable energy production and utilization in California as long as it protects unique and sensitive resources, in particular the California Desert Conservation Area (CDCA), and respects the rights of citizens who live in this conservation area.

CDC focuses on renewable energy issues affecting the Morongo Basin and its surrounding communities. CDC successfully opposed the ill-sited Green Path North transmission line, along with designation of a new utility corridor, proposed by LADWP to be built in undeveloped backcountry and along the viewshed of these high-desert communities. That inappropriate project was strongly opposed by local citizens, whose united voice and committed effort resulted in LADWP withdrawing its Green Path North Project application.

We note that there is no designated utility corridor in the Morongo Basin area, and as mentioned above, the area's citizens are strongly opposed to any future designation of a utility corridor in this area. Therefore, we point out the incorrect assumption regarding transmission portrayed on the maps on pages 8 and 9 of the "Overview of DRECP Alternatives Briefing Materials, DRECP Stakeholders Committee Meeting July 25, 2012." These energy assumption maps show a  $\geq 250$  kV transmission line running approximately from the Desert Hot Springs area to the Hesperia area. There is currently no 250 kV line running continuously on this path and for most of this path, which covers pristine public lands, there is no transmission line of any voltage. Also, there is no designated utility corridor along this path, and to build a 250 kV transmission line would require an amendment to the California Desert Conservation Area Plan in order to designate a utility corridor, something public opposition has already demonstrated in the case of the proposed Green Path North Project it would not allow to happen.

The Morongo Basin and its surrounding communities have a long heritage of commitment and action to protect desert lands. This area is a unique collection of high-desert small towns and communities nestled amongst conserved lands: Joshua Tree National Park, Big Morongo Canyon Preserve, Pioneertown Mountains Preserve, and Bighorn Mountain Wilderness. In addition, these communities have pitched in their own money to acquire lands identified for protection, purchasing private lands and gifting them to Joshua Tree National Park.

Threats to undo this conservation are a serious concern for CDC, because this geography is a foundational element of the area's quality of life and economic base. The area's economy is significantly based on tourists who come to see the desert AS IT IS NOW. In recent years, the spotlight has been shone on the high desert as a place for development of

renewable energy projects. The siting of such development in locations like the Morongo Basin and its surrounding area would be disastrous to the local lifestyle and to the tourism-based economy. Also, such siting is not wise or necessary given the abundance of already disturbed land for siting large-scale renewable energy projects and the potential for distributed generation, placing solar panels on the rooftops of homes and public and commercial structures. The use of disturbed land and distributed generation of this type should be the focus in meeting California's renewable energy goals.

Regarding the use of disturbed lands, several nonprofits have mapped hundreds of thousands of acres of private land in Southern and Central California that have willing sellers and which is available for solar development. The EPA also mapped "brown fields" throughout the U.S. and there are no known projects being proposed in California on these appropriate sites.

Another aspect of conservation efforts in the Morongo Basin are the important wildlife linkage designs developed by SC Wildlands in the South Coast Missing Linkages Design, The San Bernardino Mountains-Little San Bernardino Mountains Linkage Design, The Joshua Tree-29 Palms Linkage Design and the Desert Connectivity Network reports. Areas within these wildlife linkage designs must be excluded from renewable energy development in order to maintain the integrity of a viable desert ecosystem. We also support excluding priority conservation lands identified by the Morongo Basin Open Space Group's Conservation Priority Setting process.

The July 25 published scenarios of the DRECP, which rather late in the process even depart from DRECP's previous scenarios, were surprising and disturbing. CDC opposes the scenarios siting solar and wind development in the Morongo Basin on BLM lands next to Joshua Tree National Park and in undeveloped backcountry surrounding Big Morongo Canyon Preserve, Pioneertown Mountains Preserve, and Bighorn Mountain Wilderness. This siting and the addition of variance lands for more development is just inappropriate and inconsistent with the area's quality of life, its citizens' values, the tourism-based economy, and the San Bernardino County Master Plan.

The DRECP process should involve some outreach to affected communities. There were no workshops or meetings held in the Morongo Basin area, and its citizens received no correspondence or communication of any kind. The alternative maps have changed with little or no explanation, and the iterations of these alternatives have not allowed ample time for thoughtful comment. Considering the long-term effect of the plan, the comment period should be extended beyond the August 8 deadline.

The California Desert Coalition urges you to drop the non-existent and untenable  $\geq 250$  kV transmission line discussed above from your energy assumptions and to consider a scenario that does not develop utility-scale renewable energy in the high-desert, tourism-based communities. CDC encourages adoption of Alternative 1 after first deleting the variance lands or adoption of Alternative 2.

Thank you for considering our comments.

Respectfully,

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