



*Via Email and USPS*

5/22/2012

California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
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Sacramento, CA 95814-5512  
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<b>DOCKET</b>	
<b>09-RENEW EO-1</b>	
DATE	MAY 22 2012
RECD.	MAY 22 2012

**Re: Comments on the April 25-25, 2012 DRECP Development Scenarios and the Methodology Memorandum Dated May 8, 2012.**

To whom it concerns:

On behalf of the Center for Biological Diversity (Center) and our over 350,000 members and supporters, we are writing to provide comments on the April 25-25, 2012 DRECP Development Scenarios and the Methodology Memorandum Dated May 8, 2012. As a stakeholder in the DRECP public process, the Center supports the general comments submitted by the other conservation stakeholders, however we have additional concerns with the methodology used and outcomes of the DFA scenarios. We submit the following comments and recommendations on the DFA scenarios and the methodology.

The methodology for identifying the DFAs fails to incorporate the recommendations of the Independent Science Advisors (ISA), who advised to use a “no regrets strategy” (ISA at iii) and the following Principles for siting and designing renewable energy developments (ISA at vi-vii):

- Maximize Use of Already Disturbed Lands
- Avoid Soil Disturbance
- Avoid Disrupting Geological Processes
- Maximize Energy Per Area
- Minimize Water Use

The ISA’s recommendations were meant to inform the ultimate DRECP HCP/NCCP product. The DFA scenarios appear to represent potential alternatives under the plan, yet none of the scenarios encompasses all of these principles. Even the most conservative DFA scenario

(Scenario 1) identifies areas with clear environmental conflicts. For example, our GIS based

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analysis on Scenario 1 indicates that this scenario still includes numerous areas with identified environmental conflicts including, but not limited to:

- Final critical habitat for the southwestern willow flycatcher along the Mojave River;
- Parts of numerous BLM designated Areas of Critical Environmental Concern (ACECs) including
  - Mojave Monkeyflower ACEC
  - East Mesa ACEC
  - Lake Cahuilla ACEC
  - West Mesa ACEC
  - Pisgah ACEC
- Part of State Parks Poppy Preserve
- Critical DT linkages as identified by US Fish and Wildlife Service
- BLM designated bighorn Wildlife Habitat Management Areas
- Designated Ocotillo Wells flat-tailed horned lizard Management Area
- BLM designated Mojave River fringe-toed lizard conservation area
- BLM designated Alkali mariposa Conservation area
- Department of Fish and Game identified connectivity areas in Antelope Valley
- Los Angeles County newly proposed and existing Significant Ecological Areas
- Part of the proposed Desert Trails National Monument
- Management Areas ID in 1980 CDCA plan around Ridgecrest
- Numerous Important Bird Areas as identified by Audubon
- Areas surrounding Owens Lake that provide critical migration stopover habitat for many migratory birds including listed and sensitive species
- Two BLM designated Unusual Plant Assemblages in several locations
- Known migratory corridor for avian species through the Rose Valle.

We contend that these areas and other areas like them are inappropriately included in the DFA scenarios and should be deleted from them, based on the ISA's recommendations.

Additionally, Scenario 1 at 1,074,460 acres identifies double to five times the amount of acreage that the CEC calculator recognizes (200,000-500,000 acres) to be needed out of the planning area over the next 40 years as identified in the Overview of Preliminary Plan-Wide Biological Reserve Design and Renewable Energy Development Scenarios presentation at the April 2012 stakeholder's meeting. Therefore, the presented range of scenarios also fails to include any scenarios that include the range of acres determined to be needed by the CEC. We request that DFA scenarios be developed that incorporate the ISA's recommendations and the CEC's acreage identification ranges.

We appreciate the opportunity to provide these comments on April 25-25, 2012 DRECP Development Scenarios and the Methodology Memorandum Dated May 8, 2012. Our goal is to assist the DRECP in developing the best possible conservation plan in a timely manner that provides effective, long-term protective policies for preserving our biological resources in the California deserts while streamlining the permitting process for renewable energy projects that

are proposed in environmentally suitable areas. If you have questions or concerns about our comments please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Ilene Anderson". The signature is written in a cursive style with a large, sweeping initial "I".

Ilene Anderson  
Biologist/Desert Program Director  
Center for Biological Diversity