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Date: 5-19-13

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

RE: **Description and Comparative Evaluation of Draft DRECP Alternatives of 12/17/12**

LUCERNE VALLEY AND APPLE VALLEY ARE INCLUDED WITHIN AND SURROUNDED BY DEVELOPMENT FOCUS AREAS (DFAs) IN **ALL** ALTERNATIVES.

DRECP representatives have neither consulted with us nor have held any local/regional meetings.

Said DFAs trump and violate our community plans and the San Bernardino County General Plan, constituting a significant adverse impact on our communities' current and future land uses–potentially eliminating real economic progress. Utility-scale renewables are so heavily subsidized that many cannot economically operate on their own yet will displace other land uses that can. The acreage requirement per solar/wind MW is a poor tradeoff of desert resources within the total mix of energy options.

BLM and State energy planning (without local involvement) is unraveling a multitude of conservation efforts that citizens and BLM have spent decades implementing. We're dismantling the integrity of the California Desert and its communities, losing the whole of it by giving away its parts.

We need to adopt a policy to fill up rooftops and parking lots with photovoltaic (PV) solar where necessary transmission and infrastructure exists (which alone would substantially meet renewable goals) **before** considering any use of the DRECP's proposed DFAs. PV-covered parking lots in Palm Springs and Las Vegas alone could generate MWs better and cheaper than in our communities, closer to the areas of demand and with existing infrastructure.

The costs and impacts of transmission lines and substations to accommodate even a portion of build-out within the DFAs would be significantly disruptive. DFAs should be designated by the county and communities–not by the state or federal government–with appropriate planning to reflect a community's existing land uses, objectives, and constraints, e.g., limited water supplies for solar thermal and even for construction of PV plants, specifying low profile panels, buffering from residential uses, absolutely no utility-scale wind turbines–factoring in transmission potential and access to SCE substations that can accommodate the power. This should be a LOCAL zoning effort–not usurped by state dictates.

Respectfully,

Lorane R. Abercrombie
(signature)