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California Energy Commission
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Re: DRECP Draft Comments

Dear Chris Beale, DRECP Acting Executive Director,
and James Ramos, San Bernardino County Supervisor:

I am writing to express some of my concerns regarding the DRECP - the Desert Renewable Energy Conservation Plan.

I have a master's degree in plant biology, and did my thesis research on natural communities in the southern Sierra Nevada and how they will be impacted by climate change. I recently moved to the village of Joshua Tree just last summer, drawn here in large part by the natural beauty of the region. Though I am new here, I will be staying for a while, and am already deeply involved in the wonderful communities of the Morongo Basin.

I am gravely concerned about an excess of very large-scale energy development in wildly inappropriate areas. It is a tragedy to see large swaths of pristine desert bulldozed and destroyed in the name of energy development. A far more sensible alternative exists: FOCUS FIRST ON ROOFTOP SOLAR and other small-scale projects on already-disturbed lands.

The current draft DRECP is deeply flawed in that it has too small a goal for distributed power generation: just 2,800MW out of a 20,000 MW total are targeted to go onto rooftops, parking lots, and other disturbed sites. This proportion should

be much larger! I believe a minimum of 50% — and preferably more like 75-80% — of renewable power should be generated on-site at or very near the place where the power will be used. I therefore call for a revised draft DRECP that focuses more on providing incentives for decentralized, small-scale solar and wind development.

This shift in focus fits in with the California Energy Efficiency Strategic Plan (CEESP), which calls for rooftop power generation first. Energy efficiency measures (including rooftop solar) should be fully implemented before developing utility-scale power plants of any type on public lands. The CEESP has been in existence since 2007, and the DRECP should comply with CEESP goals.

This shift in emphasis is also ecologically sound. As a plant biologist by training, I see tremendous conservation value in our beautiful and intact desert landscapes. Preserving undisturbed areas should be our highest planning priority. Especially in this time of rapidly-unfolding climate change impacts, it is crucial that we protect as much intact habitat as we possibly can. We need to keep undisturbed corridors to allow the movement of desert wildlife and, to the extent possible, desert plants into new areas as parts of their current range become uninhabitable in a warming world.

This brings me to another particular issue that I have with the draft DRECP: there are many areas that are currently undesignated that should be accorded with durable, long-lasting conservation status. Please refer to the attached list ("Places that require conservation in the Preferred Alternative of the DRECP") of critical areas that

should be excluded in perpetuity from development.

I am very pleased to see that the current draft DRECP does include a number of wilderness and conservation areas that are completely off-limits. I would, however, like to see this expanded significantly and released in a new, revised draft.

In sum: large-scale power production, "renewable" or not, is inherently destructive to our already-stressed desert landscapes. The DRECP has great potential as a landscape-scale planning tool, but in its current form, its flaws are unacceptable. A new draft should be issued that emphasizes

(a) small-scale, localized renewable power production (eg, rooftop solar), and

(b) more pristine desert lands exempted from development, instead preserved and protected for the future.

Thank you for your consideration.

Sincerely,

Catherine M. Bell

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Attachment 2. Places that require conservation in the Preferred Alternative of the DRECP

Active sand dunes
Avawatz Mountains (including "Bowling Alley")
Big Maria Mountains and surrounding flats
Bristol Lake (excluding mineral leasing and salt mining areas)
Cadiz Valley/Iron Mountains
Chuckwalla Bench
Coso Range area (including Olancha Dunes - not including OHV area)
Danby Lake
Desert Tortoise Natural Area (ACEC)
Eagle Mountain
Existing critical habitat
Joshua tree woodland habitat
Lower Centennial Flat
Lucerne Valley wildlife linkages
Malpais Mesa (including northwestern Talc City Hills, Santa Rosa flat & Conglomerate Mesa)
Microphyll woodlands
Morongo Basin wildlife linkages
Mule Mountains
Orocopia Mountains area
Palen Lake
Pinto Mountains area
Pisgah Valley (ACEC)
Red Mountain
Riparian areas
Riverside Mountains area
Rodman Mountains area (lands abutting existing Wilderness)
Rose Valley/McCloud Flat (area in DFA)
Sacramento Mountains
Silurian Valley (including BLM Special Analysis Area and additional acreage)
Slate Range
Soda Mountains – south slope
Sperry Hills/Kingston Range
Tehachapi Mountains and Southern Sierras – areas of conservation interest
Valley Mountain
Vidal
Wildlife Linkages
Whipple Mountains area