California Energy Commission
DOCKETED
09-RENEW EO-1
TN # 75003
FEB 23 2015

22 January 2015

California Energy Commission
Dockets Office, MS-4□/ Docket No. 09-RENEW EO-01

Via Email only: docket@energy.ca.gov

Re: Draft DRECP document and related Environmental Impact Report/Statement

Dear Sir or Madam:
Thank you for the opportunity to comment on the DRECP EIS/EIR Draft. We are 20+ year residents of San Bernardino County's Morongo Basin in the Mojave high desert. Like others, we were drawn here by the magnificent scenery, intact ecosystem, healthy air, rural residential life-style, and peace & quiet.

It has been a steep challenge to absorb, understand and respond to the Plan. In retrospect our recognition of how utility scale renewable energy threatened this area's quality of life was a slow one. Very few of us realized until too recently the scope and real-life impacts posed by the various scenarios in the DRECP Draft. We have though worked to become educated and realize the importance to communicate to you our rejection of options presented in the DRECP Alternatives, as well as offer suggestions for improvement.

Our comments should not be seen as NIMBY. If we understood utility scale renewable energy development and associated transmission to urban areas were truly necessary for the desert to take this "hit" to reduce dependence on fossil fuels, carbon emissions, and gain energy independence, we would have a different position. The DRECP base-line assumptions underlying the Alternatives are flawed, limited, and not appropriate to achieve the State's energy needs.

Our rejection is also due the failure of the Plan goal to balance development of renewable energy projets with conservation of the fragile and still remarkably intact desert ecosystems. The Preferred Alternative favors out-date corporate and utility scale technologies to the detriment of the ecology and our local community. We endorse an alternative path to achieve the State's clean energy future, while preserving the fragile desert ecosystem.

Select comments for the DRECP Draft
Energy & Land calculations
The target for the amount of renewable energy to come from the DRECP region (20,000 MW) may be too high based on current population and energy need projections. Before proceeding with solutions, energy calculations must be recalibrated to reflect RE that has gone into the grid since the plan scenarios were initially drafted, as well as new technology efficiencies projected for the

near future. This will reduce assumptions based on the amount of desert land required should additional utility scale projects be required.

No Alternative with more development than the Preferred Alternative should even be considered.

Siting / DFA's

DRECP agencies and counties must refine DFAs and work with local communities to find low-conflict areas for development. Better communication and coordination needs to occur in order to avoid conflicts. We agree with the majority of residents in our community: no utility scale renewable development in the Morongo Basin or Homestead Valley. This position is based on our knowledge of the desert ecosystems - once scraped in preparation for a solar field, the desert's crust is forever and irreparably damaged. Plant life and the wildlife dependant cannot survive. Desert sands are released and go airborne with the winds and remain suspended on the atmosphere for periods of time. Human health impacts (Valley Fever, congestive heart failure, asthma) are consequences of affected areas. Air quality, visual degradation of view sheds, and now documented loss to residential property values have been documented in last few years around the solar installations that have been permitted. These sites become natural wastelands. We hear this from our neighbors in their testimony given to DRECP hearings, community meetings, in letters to the editor, on local talk radio, and when we meet casually. Utility scale RE is not compatible in rural residential areas. Particularly, in a region with the high conservation values ours has.

Development should be directed to previously disturbed degraded lands: agricultural brown fields, dumps, etc. The Preferred Alternative must reduce harm to critical desert habitat and cultural resources. Landscapes should also be kept intact for their value in keeping the high desert's economic driver, eco-tourism, alive.

The DRECP fails to incorporate the US-EPA's Re-Powering America's Lands program when siting renewable energy development.

The Range of Alternatives/CEESP

The current DRECP is limited by the singular focus on remote, large-scale power production in all alternatives considered. How can it be that no alternative accurately reflects existing California state energy policy requiring energy efficiency measures of all types, including rooftop solar (classified by the state as an energy efficiency measure). California CPUC holds that these efficiencies be fully implemented prior to developing large, remote power generation projects of any type.

California's utilities developed the California Energy Efficiency Strategic Plan (CEESP) cooperatively with the CPUC. California law establishes energy

efficiency as the highest priority resource in meeting California's energy needs. The CEESP presents a "single roadmap to achieve maximum energy savings across all major groups and sectors in California," by implementing rooftop solar, and bold appliance and building efficiency standards.

California utility procurement is currently incompatible with California Public Utilities Code Section 454.5(b)(9)(C), which requires that an electrical corporation "*shall first meet its unmet resource needs through all available energy efficiency and demand reduction resources that are cost effective, reliable, and feasible."* This incompatibility should be resolved in a DRECP that tracks the CEESP.

Governor Brown has mandated, through Executive Order B-18-12 (March 2012) implementation of the substantive elements of the CEESP for state buildings. The target of 50 percent of existing state buildings achieving Zero Net Energy (ZNE) by 2025 which accelerates the CEESP target for existing commercial buildings, 50 percent ZNE by 2030, by five years. This State government action shows with focus and rapid response there is the will and capability for achieving energy efficiencies that will reduce the load on the power grid. (These energy savings are hopefully considered in the megawatt and land-use projected in the DRECP for new energy utility development – if not they should be!) Examples of energy efficiencies at point-of-use in the built urban environment are evidence of viable alternatives to building remote and inefficient utility-scale facilities on pristine desert lands to service our urban environments. Further, this is as an exiting state-wide model in-use by CPUC and the utilities – we no not need to reinvent the wheel with DRECP!

A CEESP Alternative would also help the DRECP better meet the conservation objectives of the California Energy Commission, California Department of Fish and Wildlife, and California State Lands Commission which are: *"Reduce the biological and other environmental impacts of future utility-scale renewable energy developments in the Plan Area by designating appropriate areas for renewable energy development within the context of a landscape-scale conservation plan that are sufficient to accommodate the foreseeable demand for renewable energy in the DRECP through 2040. " and that*
"Provide for the long-term conservation and management of Covered Species within the Plan Area and preserve, restore, and enhance natural communities and ecosystems in which those species are found by focusing renewable energy development away from areas of greatest biological importance or sensitivity; coordinating and standardizing biological avoidance, minimization, mitigation, compensation, conservation, and management requirements for Covered Activities within the Plan Area; and taking other actions to meet conservation planning requirements in state and federal law. "

The failure to consider detailed analysis of viable, effective and less harmful alternatives in the draft DRECP appears to violate both NEPA and CEQA and

should be remedied by including the point-of-use energy efficiency and rooftop solar alternatives.

In Conclusion:
California's landmark greenhouse gas reduction legislation, AB32 is focused on the ultimate goal to remove carbon from electric generation. This must be the state's focus, not arbitrary classifications between solar panels that count toward meeting RPS mandates (large solar installations) and solar panels that do not (rooftop solar), and thereby sacrificing California's deserts based on this arbitrary distinction.

The better & common sense alternative for DRECP is the rapid implementation of the highest-priority state energy plan already adopted. The CPUC is driving energy policy in California, and the CEESP is current regulatory policy dating back to 2007. We urge you to use the California Energy Efficiency Strategic Plan (CEESP) as the foundation for guiding the DRECP.

If implemented quickly, the CEESP Alternative will greatly increase rooftop solar and energy savings, generating greenhouse gas reductions at the point-of-use.

Sincerely,
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