County of San Diego

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California Energy Commission
DOCKETED
09-RENEW EO-1
TN 75196
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California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

Via email at: docket@energy.ca.gov

COMMENTS ON THE DRAFT DESERT RENEWABLE ENERGY CONSERVATION PLAN AND ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT; DRECP NEPA/CEQA

Dear Mr. Chris Beale,

The County of San Diego (County) has received and reviewed the Draft Desert Renewable Energy Conservation Plan (DRECP) and Environmental Impact Statement/ Environmental Impact Report (EIS/EIR) for the California Energy Commission, dated September 23, 2014. County Planning & Development Services (PDS), Department of Public Works (DPW) and Department of Parks and Recreation staff have reviewed the draft plan and participated in public outreach meetings.

The County supports the portions of the plan that will streamline the development review process for utility-scale renewable energy projects, conserve resources, and allow the applicable local, State or Federal agencies to retain control over the approval process. However, the County has two concerns; 1) the additional transmission infrastructure that will be needed to deliver renewable energy outside the plan area; and 2) the potential for impacts to the stressed groundwater basin of Ocotillo-Clark Valley and Borrego Valley which is shared between Imperial County and the County from projects that are estimated to have high water use.

While the County is preempted from regulating electric power line projects, distribution lines, substations, or electric facilities constructed by investor-owned or municipal utilities because transmission planning is separately planned through the California Independent System Operator Corporation (CAISO) transmission planning process along with the Federal Energy Regulatory Commission, it will continue to review and provide comments on impacts to the

County's jurisdiction. During the time that the draft DRECP moves through the public comment and hearing process, the County will continue to monitor and comment on plan changes and the CAISO transmission planning process.

We request projects that are planning to utilize groundwater as a water supply from the Ocotillo-Clark Valley Basin or Borrego Valley Basin be required to provide notification to the County as part of the project approval process.

The County appreciates the opportunity to comment on the environmental review process. The County will continue to review future environmental documents related to this or other energy projects and provide comments. We have also included as an attachments, comments received from the Campo Lake Morena Community Planning Group and Borrego Springs Community Sponsor Group for your consideration. If you have any questions regarding these comments, please contact Eric Lardy, Planning Manager at (858) 694-3052 or email eric.lardy@sdcounty.ca.gov.

Sincerely,

ANDREW SPURGIN, Chief
Advance Planning
Planning & Development Services

Attachments: Comment letter from the Campo Lake Morena Community Planning Group, December 15, 2014.

Comment letter from the Borrego Springs Community Sponsor Group, December 12, 2014.

e-mail cc:

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