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California Energy Commission

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09-RENEW EO-1

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To whom this may concern:

We are writing this letter of comments, concerns, and opposition to aspects of the draft DRECP Plan. Our priorities are to protect our way of life, to protect our land both privately owned and our federal lands those owned in common by the people, to protect our water, to protect the wildlife both abundant and those rare and threaten species, to protect our plants both abundant and those rare and threaten, to protect our ecosystem, our viewshed, and last but not least, our investment in our home/our nest egg.

- We both attended numerous DRECP meetings and find a common thread. The presenters were there only to present, they were not interested in the public's opinions, even though the DRECP has the potential to negatively impact these property owners.
- Designated Focus Areas (DFA) were established without any input from the residents, business owners, community groups. *It appears as if agencies, big business, politicians, and special interests colluded for their own agendas and at what would be a cost to US taxpayers, San Bernardino County residents, and the species that inhabit these undisturbed areas of land. We support San Bernardino County's recommendation that the DRECP eliminate DFA designations in Apple Valley, unincorporated Apple Valley, Phelan (south of SR 18 between US 395 and the Los Angeles county line), Stoddard Valley, Helendale, Lucerne Valley, Johnson Valley, Newberry Springs and along historically sensitive sections of California Highway 66. We also support the County's recommendation that the DRECP consider additional DFA designations along the "395 Corridor", and SR 58.*

- Repeated questions regarding Mega Watt (MW) estimates were not addressed, nor has any attention been given to point-of-use Distributed Generation (POU-DG). *There is no mention of how much power is for local consumption versus out-of-area consumption. This is an important consideration for residents of San Bernardino County and especially significant to high desert residents who are being told to live with your decisions.*
- No answers were or have been provided regarding how much power will be utilized locally versus out-of-area. *POU-DG could provide a better model for generating power where the power is needed thereby reducing the need for inefficient, dangerous, and insightful transmission lines and substations. The behavior by presenters whenever POU-DG is brought up by concerned communities and citizens is one of disgust and dismissal. One can only assume based on this behavior that if there is no benefit to big business (SCE, LADWP, PG&E, etc.) the DRECP will not address it in positive terms.*
- The sheer quantities of land the DRECP wishes to “take” in San Bernardino County of Federal, State, County, Private land is far greater in amount and percentage than any other county within the State. *This seems to suggest that San Bernardino County is viewed in less valuable terms than any other area within California. We would suggest just the opposite. Our undisturbed lands with their fragile ecosystems are more valuable and far rarer than other counties parking lots, shopping centers, and clutter.*
- Large utility scale projects. The DRECP focuses on large scale projects at the expense of higher efficient POU-DG systems that provide power where the power is consumed. Large scale projects seem questionable at best. *Example of large scale solar: Ivanpah built with generation and natural gas consumption estimates that have yet to materialize, generating approximately 40% below what was estimated and using 4 times the amount of natural gas to run as estimated. Built with government backed loans, now asking for federal grant dollars to pay-off government backed loans? Avian deaths are another significant issue with estimates of “Streamers” (a nickname for birds igniting in the thermal field and bursting into streams while crashing to earth dead), at tens of thousands a year.*

Yet this project was approved by the same stakeholders who are participating in the development of the; DRECP, CEC, BLM, DOE, CPUC, FERC.

- Developing renewable without need. Many have raised questions about the electrical demand estimates that have been used in the preparation of the DRECP. Many have provided facts, documents, and studies that draw these estimates into question. Many presumptions are being viewed as unreliable e.g. electric car charging demands, the failure to include POU-DG into calculations, the failure to include slower growth models due to a continuing recession, etc. while the DRECP is being drawn to take vast quantities of undisturbed land. *When did it become "Green" to destroy undisturbed land? When did it become environmentally sane to destroy fragile ecosystems? When did it become okay to destroy all that is beautiful and untouched for a concrete-manmade world?*
- Economics: We agree with the County of San Bernardino's comments regarding the lack of economic value to the County. *The DRECP has failed to demonstrate long-term economic activity. These renewable generating plants employ few if any on-site personnel, provide little in tax revenues while utilizing available land that can be used for industry, recreation, environmental sustainability, etc. The current DRECP does not meet our or our County's best interests.*
- Streamlining the permitting process: One goal of the DRECP is to streamline the permitting process. The question becomes, why is it so onerous in the first place? *The answer is that over time, more and more requirements have been put in place after lessons learned. It is unrealistic to believe or trust that business will do what's best for the environment, for communities, for residents or even their country. Laws, reviews, studies, processes are put in place for compliance and even then it doesn't always work. Every night, we can tune into the news and find illegal actions by companies that "neither plead or admit guilt" but pay huge fines to sweep unethical, illegal and immoral acts under the carpet of justice. Corporations only have one legal reason to exist; to make profit, they do not have morals, ethics, a conscious, or acquire diseases from the destruction they create. They cannot be trusted and those who do, are receiving something in return for their betrayal.*

- Viewshed: One truly beautiful aspect of San Bernardino County and its high desert is viewsheds. Movies are filmed here to take advantage of unobstructed views, vistas, landscapes which provides an economic boast for this County. Visitors come here for our beautiful sunrises, sunsets. The DRECP plan in its current form will negatively impact our County's filming draw, recreational activities, quality of life, migratory routes, rare and threatened species.
- Multi-used lands: Birds use these lands for their migratory routes. Land based animals use undisturbed lands as natural pathways to and from scarce water sources. Naturalists use these lands for study; Native Americans use these lands in many ways including religious ceremonies. We use these lands for horseback riding, sightseeing, camping, etc. *These activities and many more uses will all be negatively impacted by the DRECP in its current form.*
- Biological take permitting: *What a politically correct wording for allowing the killing of rare and threaten species for a price in the name of big business profits. The US once prided itself on conservation, now big business is chipping away at every pristine area left. Oil companies have polluted the Gulf of Mexico to such a degree that it will never return in our lives, our children's lives, or our children's-children's lives. Natural gas companies are destroying our underground aquifers via fracking for "Green" energy. What do we do when there is no clean water? Thermal solar kills tens of thousands of birds every year, in the name of "Green" and profit. When does it stop?*
- Unethical and illegal behaviors: It is common knowledge that inappropriate relationships and conflicts of interest have occurred repeatedly by members of CPUC e.g. former president Peevey and Carol Brown and PG&E, SCE, SDG&E, to name a few. The thousands of emails, the conspiring to rate fix, the lavish gifts (hundreds of thousands of dollars), the sweet rate bailouts, etc. How can any of our representatives be trusted? You can't! The stench reaches each and every one of you! As a result of these revelations and the skew of your initial draft DRECP plan, you are not believable. You must return to the drawing board and:

- Develop new realistic estimates of future power needs

- Recognize and acknowledge rooftop solar/DG for its real contribution to our future

- Identify how each can address its own future electrical needs locally

- Put the environment above profit for big business

- Protect rural communities and their chosen ways of life

- Include communities, ratepayers into the planning. Not big business! Not big payoffs! Not business as usual!

Signed,

George Stone



Gail Stone

