

# Comments of enXco, First Solar, Solar Millennium, and the Center for Energy Efficiency and Renewable Technologies (CEERT) to the Independent Science Advisors

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<b>DOCKET</b>	
<b>09-RENEW EO-1</b>	
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California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: Docket No. RENEW EO-01  
The DRECP's Independent Science Process

Dear Dr. Spencer,

Thank you for your work as the Chair of the Science Panel for the Desert Renewable Energy Conservation Plan (DRECP). The DRECP process will establish a plan for protection of fragile biological resources and sustainable development of renewable energy resources. A robust plan will require decisions grounded in scientific information. The collective experience of the panel will be an invaluable resource as the ultimate value of the plan will be determined by the quality of the science that is used in its development.

We recognize the importance of the specific NCCP requirements to establish a process for the inclusion of independent scientific information to assist the plan participants. In developing sound conservation strategies, adaptive management strategies, design principles, as well as identifying data and data gaps, we would respectfully make the following recommendations:

- In developing design principles integrate the resource needs of project development and grid reliability with the biological resources of the desert. These resources include:
  - Solar, wind, and geothermal resource quality (using the most up to date data possible)
  - Distance to existing infrastructure (roads, transmission, population centers)
  - Maximum 5% slope (solar)
  - Water availability (solar and geothermal)
  - Transmission constraints

The panel should seek solutions that balance of efficient renewables development with conservation of sensitive biological resources. NREL has developed a web resource that displays an assortment of development constraints, which we think would be a useful to achieve this goal,

[http://mercator.nrel.gov/prospector\\_beta/](http://mercator.nrel.gov/prospector_beta/).

- Incorporate flexibility into reserve design principles, so that new data will continue to improve both the protection of species as well as improve utilization of the renewable resource.
  - One example of a flexible design would be to create alternative reserves and development zones configurations, each of which would protect species and habitat.
  - Having alternative scenarios would also allow for a latter, therefore a more informed decision, on the best development and best conservation design.
- While the science panel should not recommend in favor or against specific development, we urge the panel to incorporate principles that would:
  - Allow projects enough space to avoid environmentally sensitive land as well as provide sufficient buffers between projects.
  - Acknowledge the benefits of co-locating multiple plants and projects. The environmental benefits of concentrating development in one area are numerous, including minimizing the need for new transmission lines, roads and substations.
- Since neither species nor renewable resources follow private, public, or management boundaries, we would urge that the science panel's design principles should be based on the best available scientific data at the time of the decision.
- Develop criteria to evaluate effectiveness of possible mitigation strategies (acquisition, monitoring, and/ or management) for species and habitat. Because threats to species are diverse and the types of mitigation strategies are numerous, the panel should consider which mitigation strategies are most effective for each species and habitat, so that mitigation is fully utilized and flexible.
- When evaluating data and identifying data gaps, the panel should suggest ways to fill data gaps and discuss their implications on management strategies. Predictable management strategies and expectations will limit uncertainty in the development process.
- Recommend ways to iteratively and smoothly integrate new data into siting and management processes. There is a clear need to incorporate new data as it becomes available.

Thank you in advance for your consideration.

Sincerely,

V. John White  
 Executive Director  
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 Technologies

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