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09-RENEW EO-1

DATE Sept 12 2011

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Mr. Jim Bartel
Field Supervisor
Carlsbad Fish and Wildlife
6010 Hidden Valley Rd., Suite 101
Carlsbad, CA 92011

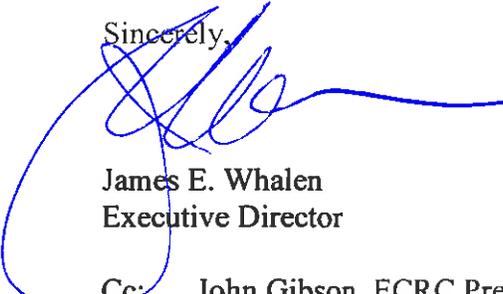
California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
Scoping Comments
1516 Ninth St.
Sacramento, CA 95814-5512

Dear Mr. Bartel and Commission:

We appreciate the opportunity to comment on the Desert Renewable Energy Conservation Plan (DRECP), and support this effort to streamline the environmental permitting process for renewable energy projects here in California. We recommend that the DRECP boundaries be expanded to cover a greater portion of San Diego County, specifically desert and high desert areas east of the Cleveland National Forest boundaries, to the Riverside & Imperial County lines and to the Mexican border. We believe that these areas represent some of the best opportunities in the Southwest for solar projects in particular, as outlined by the California Energy Commission's report on California solar resources and participation in the DRECP could address both direct and indirect cumulative impacts. We also urge the Service and California Department of Fish and Game to develop an interim take process for certain listed species similar to that utilized under Section 4-D for the California gnatcatcher while NCCP plans were under development for urbanized San Diego County.

We look forward to continuing to engage with the resource agencies as this important process moves forward. Please do not hesitate to call if you have any questions.

Sincerely,



James E. Whalen
Executive Director

Cc: John Gibson, ECRC President
Devon Muto, County of San Diego