



**DOCKET**

**09-RENEW EO-1**

DATE SEP 14 2011

RECD. SEP 30 2011

September 14, 2011

California Energy Commission  
Dockets Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512  
RE: Docket No. 09-Renew EO-0 1

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Scoping Comments on the Notice of Intent for the  
Desert Renewable Energy Conservation Plan, Habitat Conservation Plan and Possible Land Use  
Plan Amendment Environmental Impact Statement

The Center for Energy Efficiency and Renewable Technologies would like to thank the California Energy Commission (CEC) and the Renewable Energy Action Team (REAT) for the opportunity to comment on the Notice of Preparation (NOP) for the Desert Renewable Energy Conservation Plan (DRECP) Environmental Impact Statement and Environmental Impact Report (EIS/EIR) and possible amendment to the California Desert Conservation Area (CDCA).

California's current Renewable Portfolio Standard (RPS) goal of generating 33% of electrical energy from renewable sources by 2020, as legislated by SB2x, as well as California's trajectory to reduce carbon emissions by 80% by the year 2050 creates a necessary reliance on the renewable energy resources found in California's desert. The DRECP covers one of the most critical hotspots of renewable energy potential in the entire United States. This is due not only to the vast resource potential and proximity to large metropolitan load centers, but the variety of renewable resources and the large market in California for these resources. The DRECP needs to be robust and flexible enough to not only meet the 2020 goals, but comprehensive enough to allow California to stay on the path to the 2050 climate goals. This plan needs to also address the increasing reliance on energy that is intermittent by nature and

requires a different set of transmission grid characteristics than that of the traditional energy generation. Although we do not know what combination of technology and transmission solutions will be employed in realizing California's goals, the process must address a variety of feasible outcomes.

This problem is only made more complex by the vast amount of ecological resources that also exist in the desert. The DRECP will act as a Natural Communities Conservation Plan (NCCP) and a Habitat Conservation Plan (HCP) and necessarily seek to protect and conserve threatened and endangered species and habitats that exist in the desert. While these two goals must both be realized, seeking to protect the species should not unnecessarily hinder or complicate the siting of renewable energy projects.

Traditionally NCCPs and HCPs have been driven by developers that know where they want to develop. The DRECP however is driven by state and federal agencies that want to streamline permitting and promote responsible renewable energy development. CEERT asks that the DRECP accomplish its goals by clearly defining the mitigation costs but ultimately allowing the industry the freedom to choose sites that are best suited to development. CEERT echoes the concern that if large areas are placed into "go" or "no-go" hard lined zones, this will restrict flexibility, and these areas may prove to be either undevelopable or ecologically unimportant with further site specific review.

Despite this lack of data CEERT recognizes the need for Development Zones; Development Zones are needed for transmission and resource planning. It is therefore incumbent for REAT to develop the best possible zones where the best possible information is available, where the most regulatory certainty exists, where the optimum renewable resources are available, and where development is worth the environmental controversy that accompanies any development area. Beyond these well informed hard line zones, we need to maximize flexibility to allow data, as it is gathered, to inform developers and environmentalist where is best and where is not best to develop.

Therefore it is CEERT's recommendation that the EIS and EIR of the DRECP should address the following:

**Flexibility** - During the life of this plan the solar industry will develop to a mature sector and over the next 20-30 years the needs of the solar community will change. California will rely on this industry and other renewable energy industries to replace large amounts of fossil fuel driven energy sources, and the industries will rely on this plan to determine where to develop.

In the EIS and EIR alternatives larger amounts of renewable energy should be considered as the conservative case to insure the needed flexibility.

**Transmission and system needs integrated into plan** – Transmission and system needs (such as RA and Flexible Capacity) integration into planning should be a project objective. A comprehensive and flexible plan is needed to ensure that the proper transmission solutions and all system needs can be addressed in this plan.

**Preserve the best land available for solar** - CEERT and LSA (Large Solar Association) identified 2 million acres of land as priority land for solar development. This represents only 9% of the total area. As for the

remaining public lands, most, which has not already been identified by BLM's existing PEIS, is in the West Mojave due to high radiation and transmission access. However, the reason no zone has been identified in this region is due to the failure of the state and federal agencies to consider the value of the solar resource potential during the development of the West Mohave Plan and their hesitation to allocate the 1% of development allowed under that plan. CEERT has played an integral part in securing funding for further study to allow a more informed decision. A decision must be made to overcome this failure and facilitate development in the most optimum solar radiation area in the United States. The land with the highest solar resources should be made available to develop to the maximum extent possible; this will maximize the efficiency (Mw/hours) of solar development. CEERT is committed to further study to reduce the number of high insolation acres to be added to a zone in the West Mohave.

**DRECP process** -The NOI should outline stakeholder involvement. Currently there is no systematic way in which information is shared with stakeholders, whom often receive the information at the same time as the general public. The whole process will benefit from a more thorough engagement of the stakeholders and outlining the process more fully in the scoping document will set the ground work for better participation going forward.

**Local Government** - Local governments have not signed the DRECP planning agreement. If the local governments do not sign or participate more fully in these plans the DRECP will not adequately integrate local plans for renewable energy development. If this does not happen consideration should be given to limiting the DRECP to federal lands.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "V. John White". The signature is stylized and cursive.

V. John White.

Executive Director