

Memorandum

To: David Harlow, Director, Desert Renewable Energy Conservation Plan

From: Laura Crane, The Nature Conservancy

Date: July 20, 2012

Subject: Comments to the CEC Workshop – Energy and Infrastructure Implications of the DRECP
Docket No. 09-RENEW EO-01

On behalf of The Nature Conservancy, we are writing to provide comments to the California Energy Commission (CEC) Workshop, “Energy Infrastructure Implications of the DRECP,” held Friday July 13, 2012. We appreciate that the CEC convened this workshop to gather information and perspectives regarding how the DRECP can be most effective as a long-term energy infrastructure plan.

As a stakeholder in the Desert Renewable Energy Conservation Plan (DRECP) process, our organization fully supports this critical plan and we thank you for the opportunity to submit the following recommendations.

The DRECP has the potential to provide effective, long-term protective policies for conserving biological resources in the California deserts while streamlining the permitting process for appropriately sited renewable energy projects. In addition to facilitating permitting, the DRECP can and should be used by utilities and other entities to inform their procurement strategies and to plan for right-sized, rational transmission to meet renewable portfolio standard and other renewable energy goals.

1. Renewable Energy and Transmission Planning Processes

The CEC, California Public Utilities Commission (CPUC) and California Independent System Operator (CAISO) should use the DRECP in their forecasting, renewable energy and transmission planning processes. Transmission planning efforts should focus on prioritizing development of right-sized transmission lines to appropriate development focus areas within the DRECP. The CEC and CPUC should look to the DRECP area to deliver appropriately sited renewable energy projects, to meet demand, renewable energy and natural resource conservation goals. Lastly, the DRECP provides a wealth of valuable conservation data that can be used by these entities in their planning, and project permitting, processes. However, in light of the fact that load forecasts, renewable energy goals, and available biological resource information will evolve over time, the DRECP needs to incorporate a

robust adaptive management program to ensure that plan goals are achieved throughout the entire life of the plan.

2. Information Available Outside of DRECP Boundary

During the workshop, Commissioner Florio (CPUC) noted that it would help his agency to have ecoregional information outside of the DRECP boundaries. To all three entities, CEC, CPUC and CAISO, we would like to offer the analyses and mapping contained within The Nature Conservancy's ecoregional assessments for California. The Nature Conservancy's Ecoregional Assessments identify ecologically core areas (also referred to as "portfolio sites") that should be avoided when identifying and prioritizing geographic areas in California for the development of renewable energy.

The Nature Conservancy and partner agencies and organizations have created Ecoregional Assessments and Plans for eleven of California's twelve ecoregions; only the South Coast Ecoregion is not covered. These documents and their accompanying maps provide spatially explicit information about areas of high ecological and conservation value based on the distribution of species, communities and vital ecological processes they depend upon as well as the presence of large unfragmented blocks of land as well as corridors between these blocks and other protected areas. Ecoregional Plans can supplement but in no way replace endangered species recovery plans or other protected area systems, and they do not provide clear maps of where development should occur. They can, however, be used to inform efforts to identify and prioritize geographic areas in California for the development of utility-scale renewable energy generating facilities by directing attention away from areas where development is likely to have significant harmful effects on broad measures of biological diversity.

- Ecoregional Plans for seven of the eleven completed ecoregional plans are easily available on the Conservation Gateway <http://www.conservationgateway.org/content/ecoregional-reports>. (California North Coast; Columbia Plateau; East Cascades – Modoc Plateau & West Cascades; Great Basin; Klamath Mountains; Sierra Nevada).
- The Mojave Desert Ecoregional Assessment is available on ConserveOnline: <http://conserveonline.org/workspaces/cbdgateway/search?site=ConserveOnline&q=Mojave+Ecoregional+assessment&image.x=0&image.y=0>
- The Colorado Desert Assessment (Framework for Effective Conservation Management of the Sonoran Desert in California) is available on the CBI website: <http://consbio.org/products/reports/a-framework-for-effectiveconservation-management-of-the-sonoran-desert-in-california>.
- We encourage you to contact our South Coast and Deserts science lead, John Randall jrandall@tnc.org, if you would like copies of Ecoregional Plans for the Central Coast and the Central Valley.

Thank you for your consideration of our comments. We look forward to continuing to work collaboratively on the Desert Renewable Energy Conservation Plan.

Sincerely,

A handwritten signature in cursive script that reads "Laura Crane". The signature is written in a dark ink and is positioned below the word "Sincerely,".

Laura Crane
The Nature Conservancy