



California Energy Commission  
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RE: Comments on Desert Renewable Energy Conservation Plan (DRECP) Alternatives Presented at the July 25-26, 2012 Stakeholder Committee Meeting

To Whom It May Concern:

While we feel that the Desert Renewable Energy Conservation Plan represents the best way forward for balancing renewable energy development and land conservation, none of the current alternatives presented in the July Stakeholder meeting do enough to conserve lands or protect local communities in the desert. As the process moves ahead, we would like to see continued opportunity for the local communities to give input to the alternatives in a way that could “mix – and – match” elements of the alternatives together to help build towards consensus. Specifically, the “variance” process as named in the BLM’s Solar PEIS needs to be removed from the DRECP’s efforts altogether.

We believe that the very idea of variance lands run directly counter to the planning efforts underway in both the DRECP and the PEIS. Both land-use plans seek to strategically place renewable energy resources in the most appropriate places in the desert given a great deal of other land uses by following a zoning or area approach. A variance process is the antithesis to this type of approach. While lands included in the Solar Energy Zones were vetted by a broad group of stakeholders, variance lands did not undergo this same process, and therefore present many of the same problems that the plans are being designed to guard against. Variance lands have not been analyzed as a whole for their conservation values, and given the dispersed and geographically diverse nature of these lands, it is certain that any development will have effects on the broader surrounding landscape. This is particularly obvious in DRECP alternative one, the “Low Resource Conflict Alternative,” whereby the inclusion of variance lands obviously undermines the very basis for the alternative. We feel that no variance lands should be included in the “Low Resource Conflict Alternative”, or any alternative of the DRECP. We believe in a zone or focus area only approach.

An example of how variance could result in poorly planned development is in the Morongo Basin, where variance lands are scattered across most every community in the area in very small parcels. The potential for a sprawling development across rural communities like this is not only unmitigatable, but unacceptable. The Morongo Basin communities have already spoken when it comes to this type of development when they recently defeated the Green Path North transmission line. To now propose development of the same kind on a larger scale goes against the obvious wish of the community. It is for this same reason that we request the Development Focus Area lands shown in the Morongo Basin be removed from any future alternatives.

While the DRECP seeks to represent the amount of Distributed Generation in the built environment and do some basic accounting of it for planning purposes, the Plan should create a Distributed Generation Alternative. It is understandable that this Alternative would use little desert land, and therefore be dependent on land use generally outside of the planning area. But since the Plan is accounting for generation and transport outside of the DRECP in the creation of its alternatives, and is being written chiefly by the California Energy Commission, we believe the plan should include a Distributed Generation Alternative for analysis and public comment.

Given the unsure nature of future development needs and the precious nature of our desert landscapes, we believe the “No Regrets” policy as per the Independent Science Advisory Panel should be followed. Huge amounts of land should not be opened up immediately for a rush of development from speculators, as has been the case in past renewable energy development on desert lands. We encourage the process to move ahead from here without focusing on “fast-tracking” projects, but instead with an emphasis on identifying lands that are appropriate for development.

Several stakeholder groups such as the EPA, Center for Biodiversity, and the Wildlands Conservancy, have identified hundreds of thousands of acres of previously disturbed lands in California that are more appropriate for utility scale development, yet there has been little movement or further analysis of these lands by agencies and developers. For the sake of small communities and the desert’s biodiversity, please present and analysis of these lands for public comment as part of the DRECP.

There has been a tremendous investment, both privately and publicly, in conservation across the desert communities throughout the plan area. Siting projects in remote desert wild lands runs directly counter to this conservation investment, which represents the will of thousands of citizens across the planning area. It is extremely important that any development occur away from these lands. This will minimize direct disturbance to the landscape, and limit new transmission. Also, since the DRECP is being created as an HCP/NCCP, we believe that biological goals and objectives need to be named as soon as possible for the plan to be successful.

Finally, CalWEA and CEERT have both published maps showing the areas that are high priority for their future development, which have been presented with some weight as planning tools. Both entities have seemed to forget that this land has a long history of multiple use, and is the backdrop for many local communities of people who have worked hard for a lifestyle unique to the desert. It is with great presumption that these industries look to carve up what simply is not theirs for the taking. Furthermore, these maps include hundreds of thousands of acres of land purchased and donated for conservation.

These maps should be dropped from any further consideration, and planning for the HCP/NCCP should take place by putting the horse back before the cart and using the presence of resources as the first best guide to planning development.

We believe we do not need to destroy our desert wild lands and local communities to achieve our renewable energy goals.

Signed,

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