

**Audubon California • BrightSource Energy, Inc. • Center for Biological Diversity
Center for Energy Efficiency and Renewable Technologies • Defenders of Wildlife
enXco – an EDF Energies Nouvelles Company • First Solar, Inc.
Large-scale Solar Association • Natural Resources Defense Council • NRG Solar LLC
Pacific Gas and Electric Company • Sierra Club • Southern California Edison
SunPower Corporation, Systems • The Nature Conservancy • The Wilderness Society**

August 13, 2012

SENT VIA ELECTRONIC TRANSMISSION

David Harlow
California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512



Re: Desert Renewable Energy Conservation Plan

Dear Mr. Harlow:

We greatly appreciate the attention that has been given to the concerns recently raised about the DRECP process and we remain committed to ensuring the process results in a comprehensive and well-supported plan for renewable energy development and conservation in California. It has come to our attention that there may be questions about our collective support of this effort. Therefore, we want to take this opportunity to reiterate our strong joint interest in the development of a comprehensive plan that meets the goals of conservation and renewable energy development.

In order for this process to produce a supportable plan that can reasonably be expected to achieve its intended goals, we offer the following recommendations for improving and continuing stakeholder involvement over the next few critical months. We view this involvement as essential to achieving the DRECP's objectives. We look forward to an opportunity to continue to discuss these recommendations with you and others.

- 1) Provide stakeholders with a clear and commonly understood DRECP timeline and process chart.
 - a) Update the timeline and process chart to communicate how and when the outstanding DRECP issues will be addressed and where stakeholder input will be provided for in the timeline and process.
- 2) Provide stakeholders with communication forums that will continue opportunities to provide input and receive feedback as the DRECP is drafted.
 - a) The recent successful CEC Energy Infrastructure Workshop is a good example of such a forum. Similar workshops or forums for outstanding issues critical to formulation of the DRECP direction should be offered. At a minimum they should be held for:
 - i. Durability of Mitigation.
 - ii. Biological Goals and Objectives and the reserve design conservation strategy.
 - iii. Mitigation and Monitoring.
 - iv. Governance, Finance, and the anticipated Plan Amendment Process.

- b) Develop written materials, such as Question and Answer sheets, to fully communicate how other outstanding issues will be handled in the development of the DRECP. At a minimum, written materials should be provided to:
 - i. Identify how the agencies will respond to and incorporate in the Plan new data and upcoming scientific recommendations from the Independent Science Advisory Panel, as well as the issues addressed by the energy panel convened by the California Energy Commission.
 - ii. Identify how stakeholders can provide input regarding the identification of appropriate boundaries and possible uses of lands identified in the DRECP.
- 3) Provide stakeholders with an improved understanding of the status of local governments' involvement and critical role in the development of the DRECP.
 - a) Provide a description of the actions underway and the progress being made in obtaining commitments from Counties for participation in the DRECP.
 - b) Identify what assistance stakeholders can provide in encouraging County participation in the DRECP.
 - c) Identify consequences of County non-participation in the DRECP.
- 4) Provide stakeholders with a clear explanation that articulates the relationship between the DRECP and the soon to be completed Record of Decision for the DOI Solar Programmatic Environmental Impact Statement.
 - a) Develop written materials, such as Question and Answer pages, to fully communicate and provide improved understanding of the relationship between the two documents. At a minimum the written communication materials should be developed to address:
 - i. The relationship between the SPEIS decisions on lands made potentially available for utility-scale solar development and the alternatives being considered in the DRECP, including "variance lands" in the SPEIS.
 - ii. The relationship between the mitigation and monitoring identified in the SPEIS and that which will be developed in the DRECP.
 - iii. Which document policies and procedures will be applied when and how to the pending applications for utility scale solar renewable energy projects as those applications continue to be processed.

We jointly believe these recommendations for improved stakeholder involvement in the DRECP process can and will provide added value to the difficult work that is underway to draft the plan. We look forward to working closely with you in the remaining months of the year to help ensure the ultimate success of the DRECP.

Sincerely,



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Center for Biological Diversity



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The Nature Conservancy



Shannon Eddy
Large-scale Solar Association



Sarah Friedman
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Garry George
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Arthur Haubenstock
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Tim Hemig
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The Wilderness Society



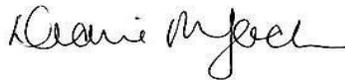
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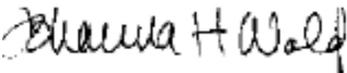
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cc: Deputy Secretary David Hayes, U.S. Department of the Interior
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Jim Kenna, California State Director, Bureau of Land Management, U.S. Department of the Interior
Michael Picker, Senior Advisor to the Governor for Renewable Energy
Karen Douglas, Commissioner, California Energy Commission