17 August 2012

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

Re: DRECP Alternatives

To Whom It May Concern:

Please accept these comments regarding the Desert Renewable Energy Conservation Plan (DRECP), and the proposed establishment of development focus areas and conservation areas.

No Regrets

As the Renewable Energy Action Team (REAT) agencies adjust and select alternatives to be analyzed in an EIS, I urge them to maintain a cautious approach that avoids the loss of wildlife and habitat consistent with the policy of "no regrets" recommended by the Independent Science Advisors at the outset of the DRECP process. Proposed policies should be based on the overarching need to act as a good steward of our wildlands.

Industry representation at the DRECP has predominantly consisted of companies that have an inherent interest in unfettered access to public lands, and past precedent has shown that many of these companies have little regard for the natural and cultural resources they displace. This precedent requires enforceable policies that realign siting practice with land stewardship goals.

--Wind facilities in the western Mojave Desert are responsible for continued harassment and death to golden eagles, and likely pose a threat to the California condor. The wind energy industry's response to US Fish and Wildlife siting concerns has been lukewarm, at best.

--Proposed and permitted solar facilities throughout the DRECP region will burden groundwater resources, and have already had higher than anticipated impacts on plants and animals, including those listed as rare or endangered at the Federal and State level.

--The Genesis Solar power project has likely caused a distemper outbreak among desert kit foxes, and has intruded on Native American burial grounds.

--The Ivanpah Solar Electric Generating System is responsible for a higher than expected take of desert tortoises in the Ivanpah Valley, and

--First Solar intends to build two more solar facilities in the Ivanpah Valley despite the expected toll on desert tortoise habitat connectivity.

--Disturbed soils for utility-scale energy facilities under construction in the DRECP region (Desert Sunlight and Ocotillo Express Wind) have already resulted in wind-blown particulate matter that certainly constitutes a violation of air quality standards, and represents the industry lack of willingness or capability to comply with air quality standards.

Analysis of alternatives should take the industry's past and current failures into account, and ensure that proposed policies and rules provide adequate avenues to prevent further degradation of natural and cultural resources, and protect the health of our communities.

Prioritize Development on Already-Disturbed Lands

Continued analysis of California's renewable energy needs should consider scenarios of aggressive distributed generation deployment and energy efficiency improvements. The presentation on the DRECP alternatives at the July stakeholders meeting appropriately included distributed generation photovoltaic installations in a map that also showed existing and proposed utility-scale energy facilities, recognizing the full array of options available to increase clean energy generation. Continued analysis of California's renewable energy needs should consider scenarios of aggressive distributed generation deployment and energy efficiency improvements.

Utility-scale solar energy development should be concentrated on already-disturbed lands and minimize the need for new or upgraded transmission lines. Among the alternatives presented at the July 25-26 stakeholders meeting, I urge REAT agencies to consider Alternative 1 as the most consistent with DRECP objectives. Alternative 1 should be modified, however, to eliminate variance lands or consider development on these lands as a lower priority to development in the identified development focus areas (DFA). All DFAs in alternative 1 should still be closely analyzed for their biological value, including habitat connectivity in the western Mojave Desert.

Other alternatives presented at the stakeholders meeting contain DFAs on desert wildlands of special importance, including DFAs to the west of Amboy near the Pisgah Valley, lands in the Silurian Valley north of Baker, the vicinity of the Morongo Canyon near Pioneertown, and a DFA that greatly expands the "solar energy zone" to the north and west of Blythe. This is not a comprehensive list of inappropriate DFAs, but highlight areas to my knowledge where industrial-scale energy projects would greatly disturb natural and cultural resources.

Beyond the need to protect natural resources from destruction, containing DFAs on already-disturbed lands will help protect another important, yet difficult to quantify, resource that the desert provides to visitors and residents– large open landscapes with minimal industrial or commercial development. A University of Idaho survey of visitors to Joshua Tree National Park found that nearly 90% of visitors cited "views without development" as one of the top reasons they liked to visit the desert park. This is almost certainly true for visitors and residents of other parts of the desert, and underscores the importance of maintaining intact swaths of desert wildlands. This resource has only been given inadequate consideration under the guise of tourism/economic impacts and visual resources that often tends to disregard some of the most accessible swaths of intact desert, such as the stretch of desert along Interstate 10 now labeled as a "solar energy zone," or the wide open valley near Charleston View in Inyo County, and bordering Stump Springs in Nevada.

Durable Protection for Ecological Treasures

Probably the most important aspect of the DRECP will be the proposed conservation areas. **It is imperative that the DRECP include changes to the land use management plan that codify their protection and/or bar future industrial-scale wind and solar energy in order to provide durable protection for the ecosystems and wildlife within conservation areas.** Without such a policy tool, continued renewable energy applications and other disturbances of ecologically sensitive lands identified as conservation areas will

continue to threaten the recovery and survival of desert plants and animals, and greatly increase the friction between conservation goals and the myriad of other land uses currently managed in the DRECP area – including military training, OHV recreation, mining, urban sprawl, etc.

Thank you for your time and effort to manage another enormous demand on our desert wildlands.

Respectfully,
Shaun Gonzales