

February 22, 2015

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California Energy Commission  
Sacramento, California



Dear CEC,

I support the idea of planning that protects desert landscapes and ecological values as well as promotes a transition to renewable energy development. To this end, I request that the authors revisit the DRECP to increase its protections for ecological communities and their members and the scenic, cultural, and historic values of the human communities in the plan area.

I ask that the Natural Community Conservation Planning Act be reexamined, and that the DRECP conform to the Act.

The DRECP lacks specific, measurable conservation targets for plant covered species and rare vegetation alliances in the Plan area, making conservation of such unlikely. Such targets should be added. I would also like to see the DRECP amended to preserve connectivity for wildlife such as desert bighorn sheep and Mojave ground squirrel.

Many of the development focus areas are inappropriate. In Inyo County, these include Lower Centennial Flat, Panamint Valley, and the Amargosa region. Inyo County, through a local process, has considered and rejected these areas as energy development focus areas.

In the same process, Inyo County has affirmed support for capping transmission through the Owens Valley at the currently existing capacity of 250 megawatts. Please add this 250 megawatt cap on transmission through the Owens Valley to the DRECP. Additionally, I support expanding the proposed conservation planning area to encompass the entirety of the Owens Valley. The only place energy development should occur in the Owens Valley is on already degraded lands that do not affect scenic values. Additionally, I support including Owens Valley BLM lands in protected status for scenic, cultural and wildlife values, excepting only lands where modifications are needed to protect the Manzanar National Historic Site from flooding.

In order to better protect wildlife, please allow only PV technology for solar development under DRECP. Finally, I have a hard time supporting 20,000 megawatts of energy development in desert settings when other less environmentally destructive alternatives, such as rooftop, road surfaces, and point-of-use

energy development remain unexploited. I understand that this is a problem greater than the DRECP, but it is impossible to discuss one without the other.

Thank you for considering my comments.

Regards,

Kristen Luetkemeier