California Energy Commission
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Comments for California Energy Commission

RE: DRECP

First of all I would like to thank the drafters of the DRECP for their hard work and dedication to the planning process to date. Our desert communities are grateful to have a planning process that includes us and that will provide guidelines for the siting of industrial scale solar, wind and geothermal renewable energy projects on public and private lands in the California desert. We support the planning process and recognize the complexity of this undertaking.

In general I support the preferred plan, though without County buy-in, this plan will end up being mainly on public land. For this reason, it is vital that planners continue to work closely with counties. I am a Joshua Tree resident and most of the preferred plan's DFA's are outside of my immediate area but I have visited almost all of the areas included in the plan and am concerned that the plan protect the desert's unique places, archaeological sites, wildlife, natural resources, wildlife corridors and scenic vistas.

- The total plan acreage within all Development Focus Areas is far greater than the 276 square miles the plan notes as necessary. Given that the plan offers no analysis of the potential for distributed generation and with DRECP targets that play out over 25 years, there is very little reason to think that this amount of land is needed for potential development of industrial plants or that an industrial production 20,000 MW will be necessary, as changing technology and conservation measures are not factored in. If the plan rollout was tiered, with lowest conflict areas developed first, it might lead to far less land loss over the life of the plan.

- There should be a distributed generation (DG) alternative with greater focus on rooftop solar. This plan should include or stress the need for conservation and efficiency programs for home owners, businesses and communities.

- There has been no effort to measure effects outside the plan area. Considering that distribution will be necessary for most of the plan area, this is a major obstacle to assessing the overall environmental cost of the plan.

- The effects to water supplies, local aquifers and wetland features are one of the most significant risks this plan imposes. More guidelines and oversight should be applied to this resource, including procedures to limit water use and greater protection for wetland features. Climate change models for this region point to even less available water and regional aquifers are already taxed by climate change. Without adequate groundwater, whole natural communities might collapse.

- This plan has no clear means to assess environmental effects once plants are implemented besides the general statements about adaptive management by the BLM. To date, industrial solar plants have had greater detrimental effects on wildlife species than previously expected. Without adequate monitoring of wildlife and resources that continues for the life of the plants, not the plan, we have no real way to gauge the actual environmental cost of the plan. Also – adequate monitoring by the BLM on private or public lands will require more staff and expertise, which will require more funding.

- Funding for the plan seems to come only from DRECP implementation fees with no extra funding going to the BLM for LUPA areas or for the adaptive management and monitoring the plan alludes to. It looks as if this plan will raise the level of protection for some of the lands BLM manages. With existing budgets tight and greater management responsibilities on some lands, the BLM will need additional funding. The BLM is underfunded in the desert region already.

- There are additional places that would benefit from conservation in the preferred plan, including riparian areas, Silurian Valley, Soda Mountain, the Desert Tortoise Natural Area, Pisgah Valley, Orocopia Mountains and more. It is crucial that all of the unique and sensitive places that have been identified and submitted to planners be included as needing conservation in the Preferred Plan.

Thanks for your hard work and for soliciting comments from desert residents. Please continue to work closely with county leaders and all the people who will be affected by this plan.

Caroline Conway
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