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

I write this letter in full support of the Basin and Range Watch letter dated January 30, 2015 and to officially request that a new alternative be added to the Desert Renewable Energy Conservation Plan (DRECP).

The current DRECP includes no alternative that accurately reflects existing California state energy priorities that require energy efficiency measures of all types, including rooftop solar (classified by the state as an energy efficiency measure), be fully implemented prior to developing large, remote power generation projects of any type, nor one that incorporates the US-EPA's Re-Powering America's Lands program when siting the latter.

The DRECP draft EIR/EIS states: "Multiple commenters noted that distributed generation, energy efficiency, and the siting of renewable energy on brownfield sites should be considered as components of a single alternative rather than as independent alternatives..." (Section II.8-3). This failure to consider detailed analysis of viable, cost-effective and less harmful alternatives to those listed in the existing draft DRECP appears to violate both NEPA and CEQA and should be remedied by including a point-of-use, energy efficiency and solar alternative.

Further, I support the position letter submitted by the County of San Bernardino. We have significant concerns with respect to the Designated Focus area in the Lucerne Valley and Apple Valley areas. This area is comprised of avian corridors for golden eagles, bats, butterflies, etc., as well as wildlife habitat for burrowing owl, desert tortoise, kit fox, and big horn sheep. And last but not least this DFA includes areas that *should be* a critical concern for its impacts on *humans* and our ability to preserve our rural way of life, sustain healthy productive rural communities, and preserve one of the most-significantly impacted, under-represented endangered species: "The Rural Living Community".

Sincerely,

Lyndie Arnaldo