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January 23, 2013

Mr. David Harlow, Director
Desert Renewable Energy Conservation Plan (DRECP)
California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

Sent via email to docket@energy.ca.gov

California Energy Commission

DOCKETED

09-RENEW EO-1

TN # 69263

JAN 23 2013

RE: *Description and Comparative Evaluation of Draft DRECP Alternatives*

Dear Mr. Harlow:

We appreciate this opportunity to comment as stakeholders in the desert renewable energy conservation planning process. The Imperial Irrigation District (IID) has regularly provided oral input at DRECP meetings, but would like to take this opportunity to specifically comment on the *Description and Comparative Evaluation of Draft DRECP Alternatives* document in order to receive consideration in the determination of the final range of alternatives and the selection of the preferred alternative. We understand that we will also have the opportunity to present additional comment during the upcoming formal 90-day review period for public review of the Draft DRECP and EIS/EIR.

The IID supports the development of renewable energy and, due the fact that the majority of the DRECP's Imperial development focus area is within IID's service area and to a large extent involves or affects our infrastructure, we are hopeful that this process moves forward and all can benefit from the streamlined permitting the DRECP will facilitate. We look to the DRECP to assist the state of California and potentially the IID in meeting the 33 percent renewable energy portfolio standard by 2020.

Currently there is no discussion in the document, *Description and Comparative Evaluation of Draft DRECP Alternatives*, about the availability of water for the development of renewable energy. IID can only supply water to projects located inside its water service area on lands that are eligible to receive water via the IID's Interim Water Supply Policy, that adhere to all appropriate best management practices as per industry standards and, to the extent these new projects are temporary in nature and have lower water demands, participate in IID's Temporary Land Use Conversion Following Program.

Understanding that the document contains a preliminary description of the affected and existing environmental conditions in the DRECP planning area, we would like to suggest that the REAT Agencies consider the covered species and habitat communities assessed in the *IID Water Conservation and Transfer Project existing permits and in the revised Draft Habitat Conservation Plan/Natural Communities Conservation Plan* being prepared as part of IID's State Water Board petition to assist with

development of the preliminary species and natural communities coverage lists the document contains as a conservation planning process yet to be established.

We would also like the Draft DRECP and EIS/EIR to consider the individual and cumulative impacts from the conversion of private land currently in agriculture production to renewable generation and the associated reduction of agricultural drain inflows to the IID drains and the eventual impacts of such reduction to the Salton Sea. We would also suggest that the Draft DRECP and EIS/EIR also consider exposed Salton Sea playa areas for development of alternative energy facilities. We look forward to reviewing the conservation and minimization measures proposed for the Imperial development focus area, including analyses regarding IID's water conveyance facilities, the New and Alamo Rivers, the Salton Sea, and the broader agricultural foraging habitats affected by proposed green energy development in this focus area.

Furthermore, the document does not address the proposed implementation of the DRECP. What is the proposed funding mechanism and who will administer the HCP/NCCP once developed? IID is a permittee in many multi-jurisdictional HCP/NCCPs and the governance and funding of this proposed HCP/NCCP is of special interest. IID is a publically owned utility in a rural community. Realizing that the integration of the proposed renewable energy from the suggested alternatives for the Imperial development focus area would require major infrastructure upgrades for the export and wheeling of energy to customers outside of the IID service area, the IID is interested in reviewing the implementation plan to ensure that the DRECP funding challenges do not directly or indirectly burden the IID rate payer.

We appreciate the development of the document prior to release of the Draft DRECP and EIS/EIR and also appreciate the opportunity to provide these comments. We recommend that our comments be incorporated and sufficiently analyzed in the Draft DRECP and EIS/EIR.

Respectfully submitted,

Vikki Dee Bradshaw

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