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California Energy Commission  
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Charlton H. Bonham  
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James G. Kenna  
State Director, California State Office  
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Ren Lohofener  
Regional Director, Region 8  
U.S. Fish and Wildlife Service  
2800 Cottage Way  
Sacramento, CA 05825

January 21, 2013

Dear Commissioner Douglas, Director Bonham, Director Kenna and Director Lohofener,

Kerncrest Audubon Society submits the following comments to the Description and Comparative Evaluation of Draft DRECP Alternatives Docket Number 09-RENEW EO-01 updated December 17, 2012.

We are a chapter of the National Audubon Society and an incorporated non-profit organization representing approximately 165 members in the Indian Wells and Kern River Valleys, Kern County, California. We submit these comments in part to provide some information specific to the northern portion of the West Mojave that might not otherwise be considered.

We believe an overlay on the entire process should be an investigation of the availability of a sustainable water supply for any facility requiring water for construction or operation. No land use plan for the desert can be realistic without such an analysis.

On all maps, a proposed development focus area is shown along highway 395 in the Rose Valley. While this area is possibly suitable for wind or solar power generation, it is likely that the Bureau of Land Management is proposing geothermal energy development here. It should be noted that geothermal power generation in addition to that already in operation is impossible unless dry cooling methods are required. Water pumping for current power production is already exceeding what the aquifer can provide without drawdown to an important riparian area. Refer to information available from the Inyo County Water Department regarding 2009 Conditional Use Permit S2007-03/Coso.

In Alternative 3:

A large triangular area in the Indian Wells Valley is designated as a development focus area. Note that the Indian Wells Valley is currently in water overdraft and does not have adequate water resources for even the dust control needed for the construction of a large industrial facility.

The southern area of the valley has been determined to be prime habitat for the endangered desert tortoise and the Mohave Ground Squirrel (MGS). In addition, the area all along highway 395 is considered an important route for MGS population connectivity.

We note that most of the land proposed as DFA in the Indian Wells Valley is in private ownership. We agree that these areas, assuming proper environmental review and the use of non-water-consuming technology, may be appropriate for small-to-medium scale development.

The map is inaccurate and extremely difficult to decipher. The Tehachapi Mountains are shown as crossing highway 14, which they do not. It is therefore difficult to locate the existing Desert Tortoise Natural Area, but it appears that a proposed DFA overlaps or comes perilously close to this area. It should not.

We can see no logical reason for wanting to concentrate alternative energy development in the Western Mojave, other than to keep it close to the urban customers in Southern California. If that is the case, it makes most sense to concentrate it further south and west, along existing transmission lines, and near already-developed areas of housing for industry employees.

#### In Alternatives 3, 4, and 5:

There is a proposed development focus area showing in the southern Searles Valley. This area is extremely remote from any area of power consumption, and construction of solar generation in the vicinity would conflict with an area of high scenic value, and of economic importance to the region in that many movies and commercials are filmed there.

In addition, there is **no water** in the area. The aquifer there feeds the brine mining operation at Searles Lake, and any attempt to divert ground water for development in the basin would likely meet intense opposition from the mining company, whose closure would be an economic hardship. Domestic water for Trona is currently imported from the Indian Wells Valley, which, as stated above, is already in overdraft.

Alternative 5 appears designed to provide maximum flexibility to the energy industry. We feel this is a bad idea because it makes little change from the status quo, in which alternative energy-producing corporations from far away, sometimes even foreign companies, with no knowledge of the local terrain or biota and no concept of the difficulties involved, simply look at a map and study some numbers generated long ago on insolation, wind velocities, etc., and decide it is a good place to apply for a permit. What ensue are law suits from environmental organizations, a waste of everyone's time and unnecessary expense to the public. Maximum flexibility does no one a favor.

We support Alternative 1 as the most restrictive in allocating the public's land to private energy-production use, and as the most protective of the environment. It appears to provide adequate acreage for energy production for the foreseeable future. If it proves inadequate, future revision may add to the land available. In restricting expedited permitting to limited areas, maximum protection from objection and legal action is secured for project applicants.

We would also support Alternative 2 if proposed as the preferred alternative.

If the public and the environmental community do not support this plan and agree (or at least indicate an intent) to withhold objection to permit applications for areas designated for development focus, nothing will have been accomplished.

Thank you for this opportunity to comment.



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