

American Wind Energy Association ~ Audubon California ~ California Native Plant Society ~ California Wind Energy Association ~ Center for Biological Diversity ~ Defenders of Wildlife ~ Natural Resources Defense Council ~ The Nature Conservancy ~ Sierra Club

January 22, 2013

Via Electronic Mail (with hardcopy to follow)
Docket No. 09-RENEW EO-01



Karen Douglas
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Charlton H. Bonham
Director
California Department of Fish & Wildlife
1416 Ninth Street
Sacramento, CA 95814

James G. Kenna
State Director, California State Office
Bureau of Land Management
2800 Cottage Way
Sacramento, CA 95825

Ren Lohofener
Regional Director, Region 8
U.S. Fish and Wildlife Service
2800 Cottage Way
Sacramento, CA 95825

Re: Wind Energy Development in the Desert Renewable Energy Conservation Plan Area

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

The undersigned wind industry representatives and environmental groups are writing to follow up on our earlier comments¹ regarding how wind energy development is proposed to be incorporated into the DRECP and particularly in the treatment of wind energy in the recent draft alternatives provided for stakeholder and public review ("December Draft"). We are concerned that issues raised in our earlier comments were not adequately addressed in the December Draft. As an indication of this we note the alternatives as presently set forth still appear to focus primarily on avoiding terrestrial impacts. Analysis has not been completed to identify suitable areas specifically for wind energy technology, considering the unique impacts and requirements of commercially viable wind development. In addition, the December Draft lacks the information and scientific basis needed to delineate or restrict areas based on avian concerns. Moreover, there

¹ "Proposed DRECP Scenario for Wind Energy Resources". California Wind Energy Association. April 17, 2012; "Comments on the DRECP July 2012 Stakeholder Meeting and Materials". California Wind Energy Association. August 16, 2012; "RE: Environmental NGO DRECP Wind Energy Recommendations". California Wind Energy Association. November 9, 2012; "DRECP Wind Energy Recommendations." Defenders of Wildlife, et al. August 24, 2012.

is little concrete information or clarity on take permitting and conservation measures. Appendix K provides some framework for addressing eagle conservation and permitting but contains so many placeholders for information to be filled in at a later date that it is impossible to evaluate the proposal or gauge the impact on wind development potential.

As explained in comments from both the wind industry and conservation groups, we believe that the DRECP as a *renewable energy conservation plan*, must adequately address wind energy development because wind energy projects contribute to the nation's and state's renewable energy goals and policy and assist in transitioning away from the fossil fuel generation and the related greenhouse gas emissions that are contributing to climate change. In addition, the conservation goals of the plan cannot be met if impacts from an entire industry are inadequately understood and planned for. Our earlier comments provided many suggestions for paths to better integrate wind energy into the DRECP, and individually, we continue to work to refine those ideas and intend to submit additional comments on the December Draft. Additionally, we are working together to formulate policy guidance for the meaningful inclusion of wind in the DRECP and hope to provide some joint recommendations in the coming months.

As we are not able to provide joint recommendations in time for the January comment deadline, as part of our effort to satisfactorily incorporate wind into the DRECP, we suggest that the agencies work with us to schedule a wind workshop in the near future to provide a forum for agency representatives and other interested parties to engage in a meaningful discussion of these issues.

We look forward to continuing to work with you on developing a DRECP that achieves conservation goals while allowing for development of a meaningful amount of wind energy and other renewable resources in our California deserts.

Sincerely,

John M. Anderson
Director of Siting Policy
American Wind Energy Association

Garry George
Renewable Energy Project Director
Audubon California

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