



October 6, 2011

Mr. David Harlow
Desert Renewable Energy Conservation Plan
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Dear Mr. Harlow:

The state and federal agencies asked the solar industry to submit a plan for the development of solar energy in the Desert Renewable Energy Conservation Plan (DRECP) area. The Center for Energy Efficiency and Renewable Technologies (CEERT) and the Large Scale Solar Association (LSA) submitted a plan on September 3, 2011. At that time CEERT agreed to work to adjust the West Mojave proposal to reflect on the ground insolation analysis.

The primary mission of the DRECP is to streamline and expedite development of renewable energy projects while conserving endangered species and natural communities at the ecosystem scale. The purpose of the DRECP is to identify areas for renewable energy project development and areas for long term natural resource conservation. The Bureau of Land Management (BLM) is in the process of developing a Solar PEIS that will create zones in the desert for development that are to be given priority for renewable energy development. For the West Mohave, with the highest solar insolation in the United States, the DRECP is to determine the zone for development for BLM.

Within the 22 million acres of the DRECP region, we believe sufficient high quality solar resource areas can be identified to insure land is available for both future renewable energy facilities and protection of adequate habitat for endangered species. We urge the agencies to look at the best places to site renewable energy projects where the resource is strongest and most consistent, and thus supports both a smaller project footprint and lower-cost projects.

We believe the most desirable solar resource in the region is concentrated in the West Mohave highlands surrounding Edwards Air Force base. That region, nearest the large coastal power demand centers, presents the advantages of qualitatively higher insolation, good topography for collector arrays, and proximity to major existing high voltage transmission lines. We find the proposal presented by the agencies includes significant lands in the West Mojave but we are disappointed that the predominance of these lands is on private lands. There are significant challenges with development on heavily parcelized private lands.

Therefore CEERT asks that the three areas in the West Mojave identified in blue on the attached map be added to the study areas. CEERT will provide additional comments on the areas proposed for the plant as it moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'V. John White'.

V. John White
Executive Director, CEERT
Attachment: Map

Additional Solar Priority Zones

