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California Energy Commission
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1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

09-RENEW EO-1

TN 74907

FEB 20 2015

**Re: Draft Desert Renewable Energy Conservation Plan (DRECP) and
Draft Environmental Impact Statement / Environmental Impact
Report**

To Whom It May Concern:

The California Wireless Association (Calwa) has recently learned of the above-named proceeding and of the potential negative impacts of the California Energy Commission's ("Commission") findings in the draft EIR/EIS in the Desert Renewable Energy Conservation Plan ("DRECP") on the deployment of wireless communication sites.

The California Wireless Association (Calwa) is a professional trade association that brings a unified voice to the wireless industry as we find ourselves facing the uniquely challenging marketing, operational and regulatory terrain of our state. In addition to providing general awareness of the wireless industry, educating consumers and public officials about the wireless industry and the critical role it plays in California. Calwa cultivates and fosters relationships among the members of the wireless industry and local jurisdictions and conducts fundraising for several charitable organizations. Visit our web site at www.calwa.org.

Although Calwa has not had time to digest the entire proceeding, we are concerned that the Commission is not adequately considering the work that has already gone into environmental review of these communication sites and the public demand for wireless communications infrastructure in these areas.

Based on a quick review of the DRECP web site, the Commission appears to be concerned about ensuring that nonrenewable energy projects continue to be developed but that such projects take into account the possibility of impacts to desert ecosystems and that some effort be made to minimize those impacts through appropriate planning. According to that site: "The Desert Renewable Energy Conservation Plan (DRECP), a major component of California's renewable energy planning efforts, will help provide effective protection and conservation of desert ecosystems while allowing for the appropriate development of renewable energy projects."

Similar consideration for deployment of wireless infrastructure likewise would seem appropriate. In fact, the federal government has labeled this infrastructure critical infrastructure and has acknowledged the important role that federal lands play in those infrastructure deployment efforts. In June 2012, the Obama Administration published an executive order, “Accelerating Broadband Infrastructure Deployment.”¹ The order established a Broadband Deployment on Federal Property Working Group: “...to ensure a coordinated and consistent approach in implementing agency procedures, requirements, and policies related to access to Federal lands, buildings, and rights of way, federally assisted highways, and tribal lands to advance broadband deployment.”²

Our Association respectfully requests additional time to review the proceedings and ensure that the Commission is properly considering the importance of deploying and maintaining wireless communications infrastructure in all areas of the State. For further information, please feel free to contact me at rjystad@channellawgroup.com or (310) 871-8189.

Respectfully Submitted,

/s/ Robert Jystad

Robert Jystad, Esq.
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¹ Accelerating Broadband Infrastructure Deployment, Exec. Order No. 13616, 77 Fed. Reg. 36903 (Jun. 14, 2012).

² *Id.*