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California Energy Commission  
Dockets Office  
1516 Ninth Street  
Sacramento, Ca 95814-5512



## DRECP Comments

To Whom I May Concern:

As a long time desert resident and lover of our California deserts, I find that I must comment on the proposed Draft Renewable Energy Conservation Plan. While Alternative 1 is preferable to the other alternatives, as it reduces some of the unnecessary development and protects some of the most valuable lands, I find that it has many problems and needs many changes and updates.

I urge a new alternative which better addresses distributed generation putting solar on roof tops of large buildings, homes, parking lots, and includes conservation, energy efficiency and use of brown fields. This is critical as there was no detailed and up-to-date analysis in the use of distributed generation in the presented alternatives, which favored large scale industrial energy projects in large tracks of our sensitive desert. This type of alternative would also decrease the need for more transmission corridors across the desert and through neighborhoods.

A new alternative should focus on the point-of-use solar alternative, developed by the California Public Utilities Commission and investor-owned utilities and is know as the California Energy Efficiency Strategic Plan (CEESP). This regulatory policy should be implemented to increase the renewable energy at point-of-use and reduce need for large scale projects in our deserts which destroys fragile desert ecosystems, requires transmission corridors, which loose lots of energy along the way.

There are many issues with the current DRECP that need to be updated, such as the energy calculator, which uses assumptions which are dated and inaccurate. There is need for new assumptions on actual need for these desert energy projects, rather than continuing the rush to site large, damaging projects across the desert. Almost 50% of renewable goals are set to be achieved with measures already in place. Approximately half of the project applications have been built or approved, with several large projects opening recently, such as Ivanpah and Desert Sunlight. With these projects and other projects, rooftop energy production, conservation, efficiency and new technology the need for industrial-scale projects across the desert will be greatly reduced or not needed at all. New technology is continuing at fast rate. The rush to build in the sensitive desert needs to be stopped until such time as an actual, well studied need is found necessary.

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Other issues not adequately addressed in the DRECP are soils, water and air quality. These large scale projects destroy large areas of desert cryptobiotic soil crusts that are a thriving carbon-sequestering ecosystem. Once these soils are destroyed in renewable energy project construction the soils are freed to blow all over the desert and this dust creates bad air quality which is a health issue to humans, wildlife and plant life. Since we are in a severe drought, water, which is always an issue in the desert, is an even greater issue as these projects use large amounts of water both in construction phase, and daily operation. Generally they are using much more water than was in their plan. This is water is in very short supply and crucial to a healthy desert ecosystem.

The National Landscape Conservation System includes many of the beautiful landscapes of the desert which are crucial for protecting the beautiful views and habitats, however, the protection seems to be vague. What kind of permanent protection is there for these lands? These spectacular areas need permanent designation and the ACEC's within these landscapes must retained within the NLCS as they were designated for a specific resource protection. Juniper Flats, which is a linkage between the San Bernardino and the Ord and Rodman Mountains, Granite Mountains and the Fry Mountains should be included in the National Landscape Conservation System. Besides being a beautiful transition area it is important for wildlife (including the Golden Eagle), plant life, connectivity and scenic values. As it is near the large populated area of Victor Valley it does need protection of its beauty, natural resources and cultural resources while providing a view from the valley, keeping sprawl at bay and providing amazing outdoor recreation opportunities for the public.

Designate undesignated lands in the plan. There are over a million acres that are left ambiguous. Some of these lands are Cadiz to Sheephole Valley, Eagle Mountain , Lucerne Valley, Morongo Valley, Mojave River, south side of Soda Mountains, and Panamint Valley. These are important for wildlife connectivity and thus their ability to survive and adapt to changing climate.

Some other sensitive areas in need of conservation protection are very special areas within this planning area. Silurian Valley should be protected as it provides a beautiful gateway valley between the Mojave National Preserve and Death Valley National Park and it has bighorn sheep connectivity, bats, golden eagles, foxes and lovely vistas with surrounding mountains and even a view of snow topped Mt. Charleston. The Soda Mountains must also be protected from proposed solar development not only for its beautiful landscape values, but for its proximity to the Mojave National Park, which is opposed to this development. The Soda Mountains are crucial habitat and connectivity for the bighorn sheep survival according to noted wildlife biologists John Wehausen, Ph.D and Clinton Epps, Ph.D. This area also borders the Soda Mountain Wilderness. This is one of the most beautiful stretches of the I-15 crossing the Mojave Desert with wonderful

vistas looking into the Mojave Preserve. Eagle Mountain is also very in need of protection due to being adjacent to Joshua Tree National Park. This landscape is critical for desert tortoise connectivity, bighorn sheep and nesting Golden Eagle.

Large scale renewable should only be put in communities that want them and not in or around communities that do not want them. Many people have moved to the desert for the beauty and rural lifestyle. They do not want their environment cluttered by transmission corridors, power sub-stations and industrial energy projects.

These lands in our beautiful deserts are like no other on earth with much to still be discovered. The unique wildlife, plant life, vistas and landscapes must be preserved, not only for our benefit, but the future generations. What message can be leave to future generations to explain why there is no beautiful desert ecosystem left. Visitors come from around the world to visit our deserts and more local people recreate there, exploring, camping, hiking, touring, taking photos and studying flora, fauna, geology, the night skies, painting, writing and just seeking solitude and renewal. These spectacular public lands must be preserved for the public. We must consider utilizing alternative energy generation methods before covering our fragile desert with utility-scale energy projects. We must implement the most innovative and efficient technology and responsible conservation.

Sincerely,

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