



California Energy Commission

**DOCKETED**

**09-RENEW EO-1**

TN # 74585

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February 19, 2015

California Energy Commission  
Dockets Office MS-4  
Dockets No. 09-Renew Eo-1  
1516 Ninth Street  
Sacramento, California 95814

**RE: 395 Corridor Special Analysis Area in the Draft DRECP**

The Desert Renewable Energy Conservation Plan area includes some of the richest and most valuable renewable energy land in North America. Unlike many parts of the US and the world, these vast, high quality renewable resources are in close proximity to millions of utility customers in urban load centers. They are extraordinary economic and environmental assets that are the envy of the world. In light of Governor Brown's new clean energy and climate targets, it is imperative that the DRECP be robust and flexible enough to achieve California's near and long term needs for renewable energy, and lay the foundation for the long-term planning that will put California on the path to achieving California's 2050 climate goals.

The Center for Energy Efficiency and Renewable Technologies and the Large Scale Solar Association have previously identified priority, high value land for solar development. Key to those was the BLM land along the 395 corridor, north of Kramer Junction in the West Mojave. A map associated with this area is attached. This land has the highest solar insolation in the United States and is among the best in the world. It also has direct access to transmission, which runs along the West side of 395. We are pleased that the Plan identified a portion of that land as a Special Analysis Area. The area identified in some of the plan alternatives is sufficient for several projects to be developed.

We strongly urge you to include the area you have proposed as a Special Analysis Area along US Route 395 as a Development Focus Area in the next iteration of the Plan. It is essential that this area be evaluated and kept available for high value solar development. Previous land use and species plans did not consider the value of and need for solar development in this area, and we understand this area is not high value Mohave Ground Squirrel habitat, but included within the protected area for connectivity. There needs to be a balance in the protection of the Mohave Ground Squirrel and high value solar development, and we believe the identification of this area as a Special Analysis Area is a recognition of this need.

It is imperative that the DRECP provide greater clarity and certainty for future development in this area in order to send a clear signal to the California Independent System Operator and the Public Utilities Commission about the strategic value and need for the Coolwater/Lugo transmission line. Approval of the transmission line has been delayed in part due to the uncertainty surrounding the area's development potential.

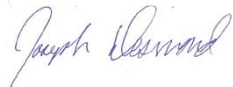
We understand that this might require a substitution for land of similar or better species conservation land, or the creation of corridors across the project site for species to move between core areas. We urge you to consider either of these or other mitigation measures in order to allow for the designation of the 395 corridor as a Development Focus Area.

Thank you for your consideration.

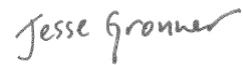
Sincerely,



V. John White  
Center for Energy Efficiency and Renewable Technologies



Joseph Desmond  
BrightSource Energy



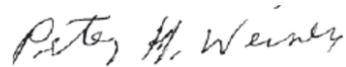
Jesse Gronner  
Iberdrola Renewables



Frederick Redell  
Abengoa Solar, LLC



Rick Miller  
EDF Renewable Energy



Peter Weiner  
Paul Hastings

Attachments: *View from US Route 395, looking west :: January 2014*  
*Map of Special Analysis Area along US Route 395*

CC: Chris Beale  
Karen Douglas  
Kevin Hunting  
Jim Kenna  
Terry Watt



*View from US Route 395, looking west :: January 2014*

# Special Analysis Area Along US Route 395

