

Energy - Docket Optical System

From: Dinah Shumway <terramins@gmail.com>
Sent: Sunday, February 22, 2015 11:42 AM
To: Energy - Docket Optical System
Subject: DRECP Comment: Alternatives rejected (Part II.8)

TN # 75291

FEB 23 2015

Rejected Alternative: Energy generation on Industrial and residential rooftops, as well as in industrial disturbed Private lands.

The DRECP alternatives do not consider the impact of rooftop, industrial site, and other local solar generation which has the incredible advantages of zero loss from transmission, negates the need for additional transmission corridors, eliminates the need for any taking of Public lands for utility scale generation. Moreover rooftop and industrial site generation on already developed lands drastically reduces the need for large quantities of water that is required in desert utility scale renewable sites for dust control (e.g. at the solar One Chuckwalla site: 1.6 AF of water PER DAY for dust control- that is about 3 X what a normal desert family uses in a YEAR!).

The 20,000 MW target for renewable generation has already been met in some local areas via conservation, rooftop generation and conventional installation on disturbed lands. Comments from lead agency (e.g. Kern County) and professionals (e.g. Mr.. Paul Douglas) indicate that the 20,000 MW target has been met in some areas, and further, that the 20,000 target does not consider the successful conservation efforts that have been undertaken by the California taxpayers who are essentially underwriting (along with the citizens of the US) the subsidies for these renewable operators on public lands.

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TN # 75289

FEB 23 2015

From: Dinah Shumway <terramins@gmail.com>
Sent: Sunday, February 22, 2015 11:36 AM
To: Energy - Docket Optical System
Subject: DRECP Comment: Comment: Inadequacy of the The California Public Utilities Commission Renewable Portfolio Standard (RPS)

Testimony at a September Desert Advisory Meeting from a knowledgeable citizen highlighted the opinion by many knowledgeable renewable professionals that the Renewable Portfolio Standard is out of date. Paul Douglas, the originator of the RPS commented in August 2014 that the RPS Calculator, which was adapted in 2009, fails to address the reality of energy generation in this decade. The Desert Advisory Commission's Subgroup on the DRECP, in concentrating on examining the purpose and need of the DRECP mandates, found that the data used for the RPS is out of date, and further that the 33% goal for renewable energy generation in CA has been met.

Comments from lead agency (e.g. Kern County) and professionals (e.g. Mr. Paul Douglas) indicate that the 20,000 MW target has been met in some areas, and further, that the 20,000 MW target does not consider the successful conservation efforts that have been undertaken by the California taxpayers who are essentially underwriting (along with the citizens of the US) the subsidies for these renewable operators on public lands.

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From: Dinah Shumway <terramins@gmail.com>
Sent: Sunday, February 22, 2015 11:38 AM
To: Energy - Docket Optical System
Subject: DRECP Comment: Mining Claims and ACEC's

TN # 75290

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⤴ Under FLMPA how will the implementation of the DRECP affect existing mining claimants' rights?

The designated areas will close those areas to mineral entry. It is critical to our society that mineral studies be continuously conducted in the light of evolving scientific knowledge and understanding of past environments, evolving tectonic events and the continuing evolution of technology and its need for mineral, some rare, resources. I am not confident that sufficient scientific studies have been conducted that will support the exclusion of mineral entry on the total of those lands.

The imposition of ACEC's over areas in which existing mining claims seems to be in conflict with the mining claimants' rights to explore for minerals on public lands. It seems illogical that any studies conducted to support the establishment of an ACEC could possibly be thorough enough to establish sufficient data that would legitimately underlie criteria to establish **150 new ACEC's**. Each ACEC is assumed to be unique, or why would such a designation be proposed?

⤴ What would be time line to conduct such studies which would support ACECs ? Where would public comment on the designation of the new ACEC's would be allowed. Here in the DRECP process? Ninety days is nowhere near enough time to comment on ACEC's that, in fact have not even been subjected to the time required for proper scientific scrutiny.

It sounds from the reading of the DRECP document that the lands so designated for the ACEC's would be withdrawn from multiple use during the "scientific" studies of the ACEC's. Each ACEC is assumed to be unique. Under the short time line for implementation of the DRECP, how would it be possible to conduct the necessary **scientific** studies to support such "**unique designations**" without incurring accusations of "shoddy science" practices?

Lands targeted as ACEC's should be open to the establishment of mineral claims until and unless the ACEC has sufficient scientific conclusions to support the establishment of an ACEC. It is illogical to think that there is enough viable scientific data to support the establishment of the huge numbers (150) of ACEC's at this time, considering the time used for the studies to establish ACEC's in the recent past. **This hurried and identical programmatic approach to the designated ACEC's seems to NEGATE the claim that each ACEC is in fact, unique, and looks instead as an attempt to exclude or at least discourage any future mineral entry.**

It is critical to our society that mineral studies be continuously conducted in the light of evolving scientific knowledge and understanding of past environments, evolving tectonic events and the continuing evolution of technology and its need for mineral, some rare, resources.

✧ What happens to mining claims in designated areas when goals have been attained?

The text seems to indicate that designated areas will be withdrawn from mineral entry. But what if the 33% goal is reached in 5 yrs, or 10 years - or as has been indicated by the testimony of knowledgeable professionals – has already been attained? Will the designated lands then be released to multiple use? If not why not. ? If the goals for renewable energy are attained all lands designated should be UN-designated and released back to multiple use.

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