

Feb 23, 2015

Submit to: docket@energy.ca.gov

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512



RE: DRECP NEPA/CEQA

Dear agencies:

I urge you to re-consider the approach to wind energy development in the Desert Renewable Energy Conservation Plan.

According to wind energy experts, the proposed Development Focus Areas (DFAs) will not support the Draft Plan's wind energy goals due to lack of area with sufficient wind resource quality. In addition, the current plan would categorically exclude wind energy from many areas with commercial-grade wind resources in the California desert. As importantly, the Draft Plan's wind energy goal -- a mere 3,070 MW under the Preferred Alternative -- is clearly too low to enable California to achieve its ambitious clean energy and climate change goals. By comparison, wind developers have installed nearly this much capacity in the DRECP area just in the past few years, playing a large role in the achievement of California's 33% RPS policy.

It is the opinion of wind energy experts that the DFAs presented in the Alternatives document are arbitrary and not based upon the environmental impacts of wind energy. Ground disturbance associated with wind energy development is very limited and, carefully sited, wind projects can avoid and minimize impacts on sensitive terrestrial species such as the desert tortoise. As a result, the DRECP's broad-scale prohibitions on wind project siting should be reconsidered.

Moreover, no analysis appears to have been conducted comparing the relatively limited environmental impacts of wind and other renewable energy sources with fossil fuels that are causing climate change and a host of other environmental ills. Climate change poses a far greater threat to sensitive desert species than does responsibly developed wind energy.

A stated goal of the DRECP is to, "Further identify the most appropriate locations within the DRECP Plan Area for the development of utility-scale renewable energy projects, taking into account potential impacts to threatened and endangered species and sensitive natural communities." Insufficient wind-specific environmental analysis has been accomplished to support the very limited areas that have been provided for wind energy development.

For the reasons stated above, I do not believe that the Draft Plan achieves its goals. Rather, it threatens to limit the role that wind energy will be able to play in moving our economy away from fossil fuels.

Wind energy is clean, cost effective and low impact compared to other sources of energy. We encourage you to revise the DRECP to allow wind energy development to play a more meaningful role in California's clean energy future.

Sincerely,

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