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

California Energy Commission

DOCKETED

09-RENEW EO-1

TN 74783

FEB 23 2015

RE: "DRECP NEPA/CEQA"

To whom it may concern:

It has been a long time coming. Much study has been done. But there are a few glaring faults with the Draft DRECP and EIR/EIS. We need to change the way we get energy and we have discovered "renewable" energy, presumably this document is intended to research the impacts of various alternatives to how we will get our energy in the future.

"1.1.1 Interagency Objectives/Purpose and Need

The fundamental interagency goal of the DRECP is to provide a streamlined process for the development of utility-scale renewable energy generation and transmission consistent with federal and state renewable energy targets and policies, while simultaneously..."

But what if we find we don't need utility-scale renewable energy generation and transmission?

Isn't the issue rather that we need energy in our homes, at our businesses and for our transportation etc. and what is the most economical and efficient way to provide that energy while minimizing the impacts to the environment? This perceived need for utility-scale renewable energy and focus seems to be the major flaw of the entire document. But there are others, most of which relate back to this stated Purpose and Need.

1) Renewable energy targets and mandates: One flaw is the assumption that all energy generation will change from centralized polluting power plants to centralized renewable energy power plants located in the Mojave Desert. This is a flawed assumption and many, many comments have been made on this subject prior to the release of this draft document. We need energy and we need to change the way we get energy, and we have been mandated to use clean renewable energy and to "get off" dirty fossil fuels. While the DRECP should comply with federal and state renewable energy targets and policies, it seems to have taken off in a direction that is not for the public good. It ignores advances made in the past decade that have helped to speed up and diversify our renewable energy portfolio.

This document aims to withdraw thousands of acres of Mojave Desert ecosystems for renewable energy use, but it has not given the reader the information needed to determine if that is the most efficient way to get our needed energy with minimal impact to the environment. There needs to be a clear and updated study as to why distributed energy, generated at the point of use is not the preferred alternative. How much energy can be achieved with generation at the point of use, and how much energy, water and habitat would be conserved with such an alternative? Only then can we decide how much of our precious desert should be withdrawn from public use for the private profit of renewable

energy generating corporations. Industrial scale, remotely located renewable energy plants use up more wildlife habitat, recreation lands and require more water use and expensive transmission than energy generated at the point of use. Industrial scale renewable energy plants also create more dust which can carry over long distances and cause significant health issues.

Moreover, industrial scale renewable energy projects remotely located in the desert keep people reliant on the mega grid, which must then provide a reliable product at a reasonable price. The mega-grid is a thing of the past, it is outdated and wasteful, as well as being a cause of concern for national security. Since the sun doesn't shine and the wind doesn't blow 24 hours a day 365 days a year there must be some alternative – storage or use of non-renewable or fossil fuel – during times that energy is not being produced by the sun or wind.

I did not find this disclosed in the Draft DRECP and EIR/EIS. An estimate of this fuel must be disclosed in the EIR/EIS. With increasing technology in battery and fuel cell storage efficiency, people are choosing rooftop solar for their homes and businesses. Which provides more reliable/affordable energy and more jobs-small scale renewable energy or industrial scale renewable energy? This must be discussed.

2) **Costs of transmission lines:** If there is still a need for industrial-scale Renewable energy plants on public lands in our Mojave Desert, then they must be located along existing transmission lines and no new ones should be built. They are extremely costly, unsightly and inefficient. Long Transmission lines leak energy and the roads serving them have become magnets for off roading. Irresponsible drivers take short cuts and make a proliferation of routes off the main transmission line road into sensitive habitat areas. Currently, utility companies are not adequately maintaining these roads which also become targets for illegal dumping. Utility companies should be held accountable for the lifetime of the lines, towers and roads that they seem to think are necessary. They should pay for the law enforcement needed to patrol the areas surrounding the transmission line roads. These costs must be included in the evaluation of utility scale renewable energy vs. energy generated at the point of use.

3) **Conservation:** The desert area (CDCA) is a wonderfully diverse ecosystem. This ecosystem can only survive with large tracts of land relatively undisturbed. Small pieces of land here and there will do nothing to conserve the rich biodiversity that we have today and which is diminishing with development, extractive processes, grazing and motorized travel.

The DRECP should have developed an alternative that focuses on minimal to no disturbance to our public lands and minimal to no loss of value for our private lands. All efforts must be made to keep developments, including renewable energy and transmission lines from negatively impacting our sensitive habitat and areas with historical values. We should not project on our most sensitive lands and for our most sensitive species including Soda Mountain area, Silurian Valley, Cadiz Valley, Lucerne Valley, Juniper Flats Area and connectivity corridor between the San Bernardino Mountains and the Granite Mountains, Mountain Pass, and the Desert Tortoise Natural Research Area. Areas for wildlife corridors should not be developed.

The Mojave River is not mentioned as a wildlife corridor – isn't it?

All alternatives should take into consideration all cumulative impacts. The DRECP does not do that.

Please clear up the confusion about ACECs and NLCS lands. Will ACECs lose their protections if they are swallowed up in the National Landscape System? I request that the BLM retain all the ACECs within a

larger National Conservation Landscape system. National Conservation system lands must be off limits to all industrial scale development including mining and mineral leases.

Please also clear up confusion BLM land status changes. Are all currently designated Limited Use lands conservation lands?

Who will pay for the protection of conservation lands to ensure that they do not become degraded from other uses and or multiple high-impact uses? How much money will be needed to conserve the lands designated, and how did the agencies calculate that figure?

Conservation designations on BLM lands must be consistent and provide clear, measurable commitments as to the specific goal of conservation of each area and specific contributions areas make to the conservation strategy.

4) **DRECP and WEMO:** I find that the DRECP also includes some massive land use changes. This is confusing to me because it seems out of place. The revised WEMO has not yet become public and these land use changes must also be evaluated along with the transportation element of WEMO. How can one evaluate and comment on one large document when parts are missing? This needs to be explained and resolved adequately.

Perhaps the DRECP and WEMO must have the same comment periods. Both will be amending the CDCA and for many of the same millions of acres, yet the RODs will overlap (one will be almost finished while people are still commenting on the other).

Which document trumps the other in the event of a conflict? This must be disclosed.

5) **Funding:** There must be a clearer evaluation on how these projects will be funded: Transmission lines, industrial scale renewable energy plants, and conservation efforts.

Where does the funding come from? Is the public, as rate payers, expected to shoulder the burden of continual funding of unnecessary transmission lines? Will tax dollars still subsidize private renewable energy companies for their investors' profit? How much will be needed to implement this plan and over what period of time? Who will pay for the protection of conservation lands to ensure that they do not become degraded from other uses and or multiple high impact uses?

How much will be needed to conserve the lands designated, and how did the agencies calculate that figure?

6) **Private property for renewable energy:** The DRECP does not seem to be the correct document to set aside private property for renewable development focus areas. Local governments must first set in motion a general plan change and adopt that plan BEFORE a huge plan such as the DRECP. Cities and counties should have been encouraged to come up with their general plan changes to incorporate renewable energy generation by a deadline to be included in the DRECP. This encouragement should not be limited to cities/counties in the Mojave Desert, **but should include all of California.** This would have given the DRECP a better estimate on how much energy could be produced closer to the point of use and how much would be needed (if any) on public lands.

The DRECP proposes to generate electricity for far off urban centers when those same urban centers are not doing much to produce their own electricity. Why? Los Angeles and other cities have plenty of

brown fields and rooftops that can turn the sun's energy into useful electricity for their residents and businesses.

People residing in rural communities such as Lucerne Valley, Apple Valley and the surrounding county lands should not be subjected to a loss of property value for the benefit of distant residents.

7) **WATER:** I am choosing to make a separate comment about water because it is so life sustaining and we cannot do without it! Large industrial scale developments utilize vast amounts of water in their construction and ongoing. We are in a drought situation and therefore the proposal to "develop" thousands of acres of desert and use precious water unnecessarily seems stupid. An alternative to this use of water does exist and has been dismissed – rooftop solar and solar on parking lots and businesses where the electricity is needed or close by. It is important to conserve our water as well as to conserve our electricity and sensitive desert habitats. This alone makes it necessary to re-state the purpose and need. We do not NEED to develop projects that waste water. Most of the desert region is in an overdrawn state without the added use of water for renewable energy projects.

8) **The NO ACTION alternative:** This assumes that there is no document other than the DRECP which can/will create more conservation lands. Meanwhile the Solar PEIS has been signed, and other land use actions have been taken and the WEMO plan is being prepared.

9) **The presentation of the information:** Frustration!
Parts of the CD is very slow to work through. Is it necessary to have a printed version or can something be done to speed things up? There is not an adequate index. For example, Appendix L has 9 parts to the ACECs and in order to find the ACEC or area that you want to look at, you have to go through all of them. There is no "overview" to tell you which number goes to which region. This is the case throughout the document. If you wanted to look up the impacts on "water" for example, as far as I can tell, you have to read all 8,000 pages. Meanwhile, the computer is getting jammed.
Using the internet is a bit better – surprise! However, the index is inadequate as stated above. In the case of Appendix L for example, for the BLM worksheets there are 13 parts to part 8 and 9 parts to part 9 and this is found by randomly selecting one of 5 downloads - or by going thru the 5 one by one. One of the larger downloads timed out before I got it downloaded.

Thank you for considering my comments,
Sincerely,

Jenny Wilder,