

DRECP COMMENTS

Nov. 19, 2014

The mindset “good-enough-for-government-work” must be abolished in this document by using language embracing **adaptive management**. Incentivize large utility-scale technology to do more with less. The rapidly expanding horizons of solar technology just in the last 5 years are mind-blowing. Look around and see the leading edge of science; foster use of these technologies. Demand transparency in numbers and the moneyed amounts.

Speaking of transparency in numbers, from **where do you derive 20,000 MW** target amount? Demographic studies can be in depth and quite precise. Where are those studies?

Also completely transparent must be the **funding forthcoming to monitor** and adhere to monitoring standards in perpetuity. The immensity of this task and all the work going into it will be without value if not monitored for compliance.

All existing **DFA's must be refined** in favor of critical habitats and cultural resources. Any suggestion that the number of DFA's need be increased per alternative/non-preferred plans is a non-starter. Utility scale development in the Desert Tortoise Research Natural Area, for example, is preposterous. No amount of mitigation can rectify blading the desert in one of the only places where the tortoise population is actually increasing.

Additionally, development in critical resource areas of Soda Mountain and Silurian Valley is so ill advised that to do so would **undermine the credibility of this process**. This, in turn would assure all of us who are watching, that the political course of action merits more importance than scientific inquiry.

Finally, the target amount of renewable energy can be met **using 50% distributed sources** with merely a shift in outlook. Solar on existing roofs where the electricity is actually used makes sense on so many levels, with no disrespect meant to large scale developers.

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