Date: January 29, 2015

**Comment for the Draft Desert Renewable Energy Conservation Plan (DRECP)
and
Environmental Impact Report/Environmental Impact Statement (EIR/EIS)**

Dear Commissioner Douglas, Director Bonham, Director Kenna, and Director Lohoefener:

We are in a renewable energy development company that envisions a cleaner and greener environment with sensitivity to endangered species as well as federal and state policies. We are focused in making the best use of the draft DRECP designated DFAs while still preserving what few numbers we have left of our endangered desert species.

We are writing to the members of DRECP to add public comment and hopefully bring about some critical issues regarding the DFAs and the future of renewable energy projects.

First, thank you for compiling the draft document of over 8,000 pages to address both renewables and the conversation efforts in Southern California. As a developer, every bit of research done to make the process of renewable energy projects more efficient is priceless. This, paired with the locations of DFAs, allow for better prospect in regards to future projects.

However, even with DRECP presentations regarding the DFAs to be estimated around 177,000 acres of allowable ground disturbance, there are some key elements that any developer would have clarified and considered: policies, scarcity, and project security.

In California, the length of time it takes to have a project scouted, verified, analyzed, and constructed for operation is about twice as long as most other states. This is due to various policies and permits that California issues for any construction with allowable disturbance to natural and man-made resources as well as abiding to various restrictions regarding military, radar, wind rights, BLM lands, Fish and Wildlife Services, transmission studies, and earthquake hazards, and more. Just the bird study alone takes a minimum of 12 months in addition to other sections of an EIS/EIR, and having measures taking considerations for this and other studies through the DRECP would simplify the process and quicken development for many future projects in southern California.

In addition, each project has to deal with endangered species. Mitigation efforts deter some of these effects as well as take permits, but, even with these measures, 30-40% of renewable energy projects fail in the development stages due to county officials halting renewables from unsubstantiated claims of hurting endangered species with large buffer zones, or the areas available for renewables does not equate to be financially viable. Although having over 150,000 acres to work with towards renewable energy sounds generous, only a certain small percentage

of that will actually develop a cost-effective project. There is very little clarity about guidelines, permitting, and green lit zones among various parties regarding any development. As developers, let's work together to allow both conservation and development to happen rather than having to gamble large investments. With the improvement on technology, more safety controls will reduce or eliminate risk to endangered species. County officials should not shut down renewable energy projects out right based on old data and assumptions, so having pilot projects in cooperation with DRECP to disprove their claims should be allowable.

In regards to scarcity, there are very few locations where good wind speeds are available, specifically, Alameda, Imperial, Riverside, and Kern counties. As far as efficiencies go, in 2013, wind and solar had similar amounts of installed capacity in California, but the generation of each source clearly shows how effective and needed wind power is.

California, 2013	Wind	Solar
Installed MW	5,830	5,183
GWh Generated	13,230	3,865
Sources: NREL, EIA, AWEA		

Even though there is about a 15% difference in installed capacity of wind over solar, the energy generated by wind is 240% more than solar, and wind turbines are generating more energy with better technology, increasing capacity factors. California has vast open lands and millions of people's roofs for solar development, but forfeiting the rare yet incredible wind energy available to us would be a giant step backwards in developing wind projects. Areas with great wind resource should be of utmost priority, as the staggering amount of energy generation would mainly be achieved through wind turbines.

Attached are two PDF files with specific examples that prove the points made above.
DRECP DFAs for Wind
Within the black rings are high wind speeds for potentially successful wind projects. This land is part of DRECP's preferred land plan as DFAs, yet development of projects too close to the mountains incurs stunningly high costs, and county officials disallow any project near the condors due to concerns with Fish and Wildlife Services. Even with substantial spacing away from the condor areas, wind projects will either be shut down by the county without ample spacing, or be moved further away and, by doing so, lose any economic viability remaining from the vastly weaker wind speeds. The top right ring involves BLM land as well as established wind turbines. The bottom ring is within LA County, which involve solar farms, residential buildings, and protected conservation lands. Kern county officials have expressed interest in renewable energy projects, but without DRECP's intervention, development of renewable energy projects and improvement of surrounding economies cannot happen.

DRECP Land Coverage and Wind Areas

In this map, all within the dark gray areas are under the DRECP. However, within them, there are various good wind resource areas highlighted with magenta rectangles, but not labeled as DFAs. Southern California has very limited wind resources so we should not forego possible development in these marked areas, especially the general San Bernardino county desert area. We developers see the potential of new projects with already installed transmission lines around these marked areas. San Bernardino has not tried to push for any new projects for years due to eagles in the area, even in the incredible wind resource in Apple Valley (light blue circle). Still, just like the condor issue in Kern County, there are various mitigation efforts to keep the eagles safe from harm. Other than these areas, there is very little or weak wind resource in California. If DRECP can lend a helping hand in allowing more wind farm development areas, including special attention to Apple Valley's high wind resource, then more wind projects will be constructed to ensure a better future for all of us.
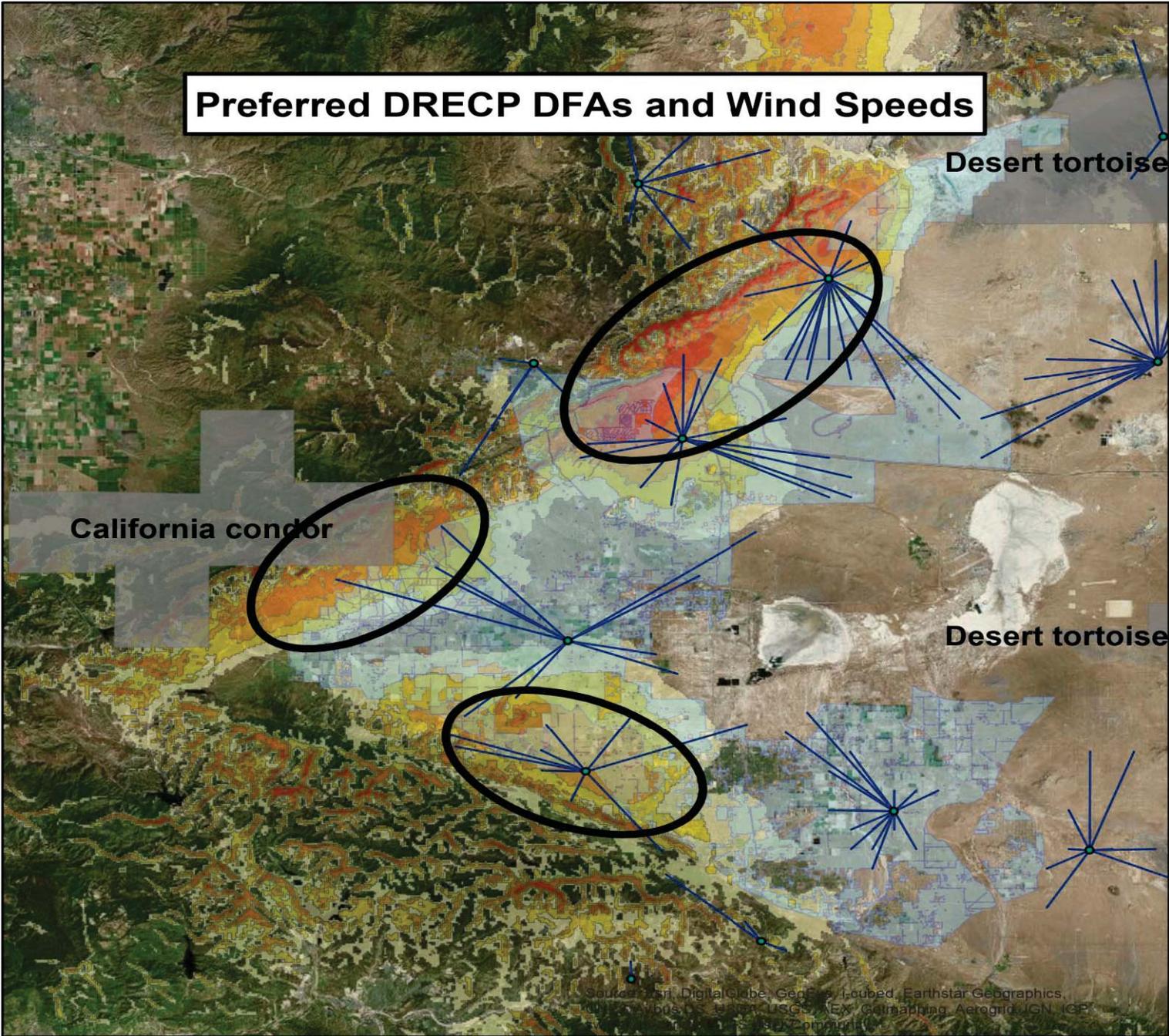
By viewing and listening to others' comments from transcripts, submissions, and recordings online and in person, there have been notable concerns about several businesses that can be wiped out from the direct implementation of DRECP. We as a business speak for others and ourselves in that we urge the members of DRECP to address our concerns to prioritize the improvement of surrounding economies first and foremost with sensitivity to existing businesses by placing utmost priority on wind project development, and expediting policies regarding the permitting of future renewable energy projects for the improvement of California's renewable energy generation. Hundreds of millions of dollars are put into each project, and thousands of jobs are at stake with the increasing scarcity of available DFAs.

We believe that DRECP can work with both conservation and economic efforts, providing solutions for developers and conservationists alike. Thank you for your time and hard work.

Sincerely,

The Members of a Concerned Renewable Energy Company
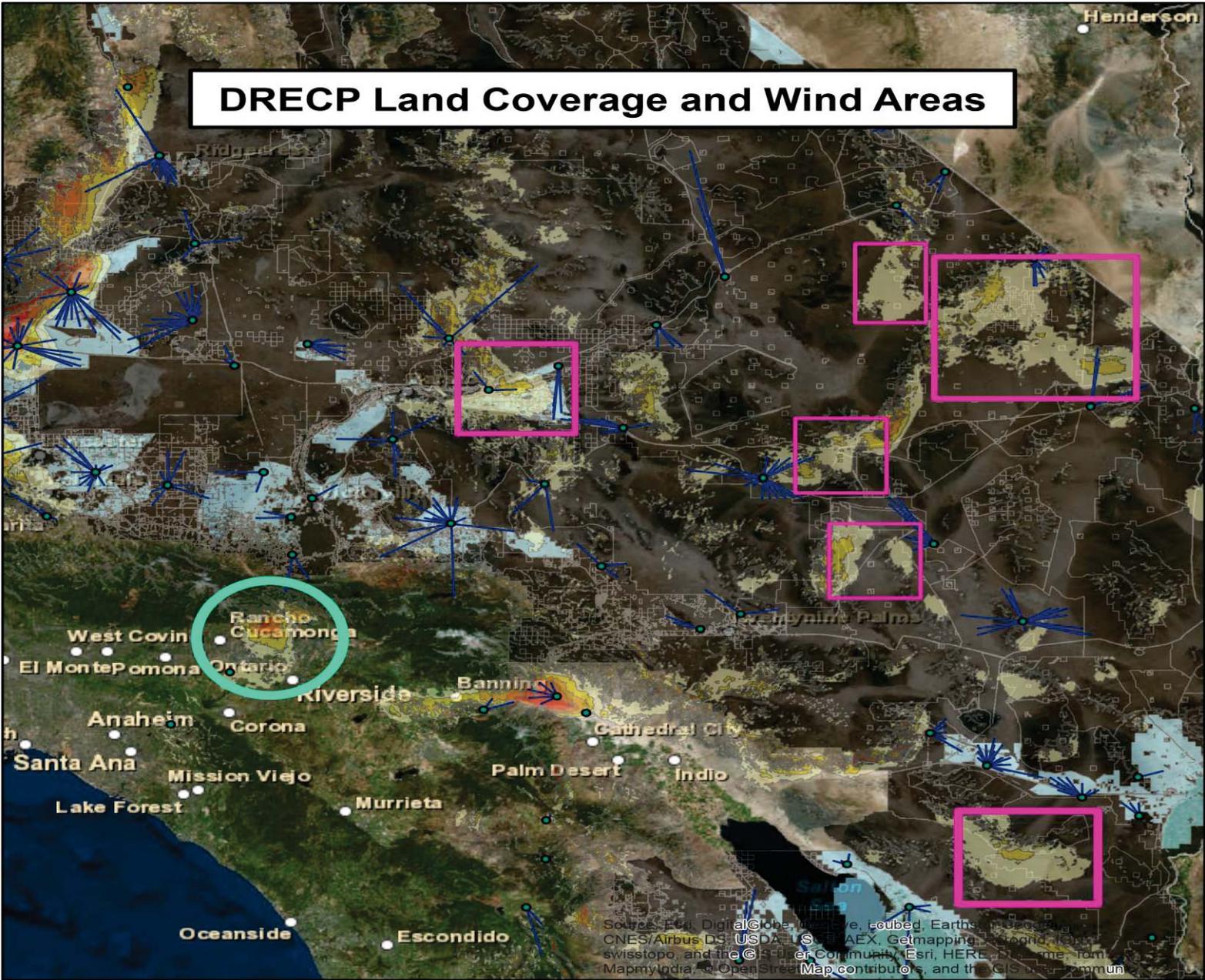
Preferred DRECP DFAs and Wind Speeds

Desert tortoise

California condor

Desert tortoise

Sources: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Legend

WPC
- 3
- 4
- 5
- 6
- 7

● RETI_CollectorSubstations
— RETI_CollectorLines
DRECP Preferred Integration Land

DRECP Preferred Integration Land

DRECP Land Coverage and Wind Areas

Legend

WPC
- 3
- 4
- 5
- 6
- 7

● RETI_CollectorSubstations

—— RETI_CollectorLines

Land_Dev
- NOT OK
- OK