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California Energy Commission

DOCKETED

09-RENEW EO-1

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

February 23, 2015

Decision-makers:

The Western Lands Project strongly opposes all of the alternatives, including No-Action, currently offered in the Desert Renewable Energy Conservation Plan proposal. We would support only an alternative based on the California Energy Efficiency Strategic Plan, enhanced, if necessary, with the addition of contaminated and degraded sites identified by the U.S. Environmental Protection Agency (EPA). This must be the preferred, and chosen, alternative.

We also incorporate by reference the comments submitted by Basin & Range Watch, Powers Engineering, and Solar Done Right, and signed by many organizations, including ours.

Since 2010, Western Lands Project has spoken out against the destructive policies that focus renewable energy development on our public lands. This policy, from the federal and now the state level, transforms habitat-rich, multiple-use public lands into permanent industrial zones. While federal lands are leased, they are effectively privatized for the life of the plants' operation, and industrialized over the long term.

In its Programmatic EIS for solar development on public lands, the Bureau of Land Management itself stated that ecological recovery of these sites after decommissioning—if even possible—could take 5,000 years. As solar-industrialization of the desert continues, it is becoming clear that these plants pose threats to [birds](#), and even to [airline pilots](#). These plants use precious water; disturb carbon-sequestering desert soils; and require concomitant ground disturbance and habitat destruction for transmission infrastructure. Wind power has also proven not to be the easy and harmless answer many would like it to be.

What the cumulative consequences may be of additional industrial-scale solar, wind, and geothermal development is unknown, but it is not unreasonable to fear an unraveling of our desert ecosystems.

The policy advanced both in the PEIS and the DRECP is a grave mistake, demonstrative of the same kind of human folly that has led us to the climate disruption that is in turn being used to rationalize destroying our public lands for industrial-scale non-fossil-fuel energy. Governments at all levels should be aggressively pursuing energy efficiency, distributed generation, and siting

on damaged or degraded lands near transmission, such as those identified by the EPA through its [Re-Powering America's Land program](#).

We also reject the DRECP's comingling of decisions regarding industrial renewables development and land conservation, which cynically pulls land preservation advocates into participating in false and unacceptable tradeoffs between development and protection. These advocates should be joining us in calling for a massive investment in the CEESP/EPA lands approach rather than acquiescing to the consignment of some lands to eventual destruction. We must also redouble our efforts to protect our wild desert lands that remain.

Finally, we find it appalling that the DRECP planning effort will absorb \$30 million dollars in consultant fees, untold time and energy of agency staff, and the precious time and resources of citizens—all in creating and attempting to understand an opaque document that advances an utterly mistake approach to renewable energy.

Sincerely,

A handwritten signature in cursive script that reads "Janine Blaeloch". The ink is dark and the signature is fluid and connected.

Janine Blaeloch
Director