February 20, 2015

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

Re: DRECP NEPA/CEQA

To Whom It May Concern:

I am very concerned with the basic directives of the Draft Renewable Energy Conservation Plan to turn extensive land into energy production facilities. It is indeed vital that California accelerate the reduction of greenhouse gases, and it is no less vital that we do so in optimal ways. However, the basic assumptions of the DRECP to locate 20,000MW of renewable energy generation in desert locations remote from the energy consumer markets avoids the best alternatives. Good science has well established that centralized, remote, large-scale solar development is inefficient, costly, unstable, risky, and depleting to land in comparison to a range of smarter measures integrating urban, suburban, and rural roof tops, parking lots, rights of way, and already degraded lands. Ample sunshine and wind fall upon and blow across most all areas of California, and it is short sighted and wasteful to turn undeveloped land into barren areas when we have millions of acres of available sites within and close to the energy markets.

Important weaknesses of centralized, remote energy generation include:

- transmission loss of 7-14% along extended and expensive high-tension lines
- vulnerability to vandalism and terrorism for extensive segments of the population
- increased loss of production to cloud cover
- increased dependence on large utilities
- substantial need for water in hyper-arid areas

However careful the work that the agencies feeding into the DRECP may have done to site facilities in less sensitive areas, the fact remains that the plan makes a choice to destroy undeveloped land with inefficient facilities compared to the superior alternative of facilitating efficiency, conservation, and renewable energy development that's dispersed and integrated into the areas where people live and the energy is needed. As a resident of Inyo County I am very concerned for the future of open lands and water resources to potentially be used for generation, transmission corridors, and maintenance of centralized facilities. I urge you to scrap the DRECP priorities for developing desert lands and aggressively adopt priorities proven to work by the
U.S. military, UCLA's Luskin Center for Innovation, and Bill Powers’ proposals for appropriate energy development for southern California and the Bay Area.

Sincerely,

[Signature]

Andy Selters
Response to Comment Letter F159

Andy Selters
February 20, 2015

F159-1 The distributed generation alternative does not meet the Bureau of Land Management’s (BLM’s) purpose and need. Distributed generation was considered but not carried forward, as discussed in Volume II, Section II.8.2.1. BLM lands are largely devoid of buildings and distributed generation is applicable in locations with both electrical demand and areas or surfaces available for installation of distributed generation technology.