DATE: 2-23-15

FROM: CAROLYN ALLEN

TO: CALIFORNIA ENERGY COMMISSION

SUBJECT: COMMENTS ON THE DESERT RENEWABLE ENERGY CONSERVATION PLAN (DRECP)

To Whom It May Concern,

1) I oppose the DRECP as written. I support point-of-use generation (rooftop solar) it doesn’t make sense to destroy our farmland, open spaces or deserts when solar panels can be more appropriately placed on our roofs. Here I want to reference an article that demonstrates this point, it is by David Garmon and appeared in the San Diego Union Dec. 2014. While this is not an endorsement of everything in his article; he does make an excellent case for putting solar on rooftop instead of distant locations from where the energy will actually be used. http://www.utsandiego.com/news/2014/dec/18/desert-renewable-energy-plan/ In Chapter II.B of Vol II of VI pg. 11.8.1 is the section “Alternatives Considered But Not Carried Forward”. The rationale behind not considering the Distributed Generation Alternative beginning on page II.B.6 does not give justice to the huge benefits of rooftop solar. This Alternative should be included.

2) The DRECP is such a huge volume, with thousands of pages, making it impossible to properly review it in such a short amount. Although there was a small extension, the public should have been given even more time for review of a document that has taken years to put together.

3) Solar projects should be prohibited on farmland under the DRECP (with the exception of panels on roofs of barns, warehouses and similar structures on farms). As an Imperial County resident, I am extremely concerned about our farmland being converted into large industrial scale solar facilities. When you look at the map (Figure 5. Preferred Alternative) pg. 29 of the Executive Summary, it shows all of Imperial County’s farmland within the DFA (Development Focus Area). Also Table III.12-3 Vol. II of VI pg. III.12-4 shows by categories of land type exactly how much farmland falls under the DFA. In Imperial County the total number of acres is a whopping 539,000 acres (almost all of it is Prime or Farmland of Statewide Importance. This puts our agricultural community at a vastly disproportionate risk for development in comparison to many other areas in our state. Having farmland within the DFA puts a huge target for destruction on that land. Here are 3 reports that illustrate the need to protect all of our farmland. (As a disclaimer, while I may not agree with all of the info contained in the 3 reports I think overall they bring up good points about why protecting our farmland from development is so crucial…...endangering food supply, loss of jobs, loss of habitat for wildlife...just to name a few of the many concerns included in the reports.)

A) http://www.mGeorge.edu/Documents/Publications/MLIVolume44_4_07_Odens%20Final.pdf


C) http://www.farmlands.org/programsstates/CA/documents/PavingParadise_AmericanFarmlandTrust_Nov07.pdf

4) See section III.12.1.2.3 Vol.II of VI pg. III.12-3 and pg III.12-4 This section needs to contain info. Stating that farm ground that is categorized as less important sometimes can grow important produce crops. For example organic vegetables are now being grown very successfully on ground where this was once thought impossible. Ground that the Conservation mapping showed as less important. So there truly is no unimportant farmland. This is stated in the article attached which appeared in the Desert Review on Feb 10, Page 1.
5) Also in reference to the above mentioned section III.12.1.2.3, it needs to be noted in this section of the DRECP that just because a piece of prime land or land of statewide importance happens to have grown a forage crop for several years does not reclassify the ground as marginal as was said by a developer at a public hearing I attended for a solar project. The farmland still has the ability to grow what are considered higher value crops when the farmer makes that decision.

6) It should be noted in the DRECP that Imperial County is a very productive agricultural area. See the Imperial County Agricultural Crop & Livestock Report 2013 and the Imperial County Farm Bureau Imperial County Agriculture info sheets.

7) Section III.12.2.1 Vol IIIV V1 pg III-12-17 All Williamson Act Land should be taken out of the DFA and not be considered for conversion. The negative impacts of canceling Williamson Act contracts due to renewable energy is not addressed properly in the DRECP. Approx. 22,000 acres of Imperial County farmland has already been approved for solar development. Many of these projects contained land under a Williamson Act contract. Many local people felt the conditions for cancellation were not properly met and therefore the county should not have been allowed to cancel the contracts. To avoid this controversy remove all Williamson Act ground from the DRECP. See the article “California’s Disappearing Farmland” dated Dec. 2013 http://calwatchdog.com/2013/12/23/californias-disappearing-farmland/

It lists concerns about the Williamson Act and conversion of farmland.

8) DRECP does not address adequately the negative impacts caused to county residents when their County General Plans are changed in order to accommodate renewable energy projects. In all practicality, the DRECP is the reason our county accepted a $700,000.00 grant from the CEC. The CEC is financially helping to destroy our valley. The update does not go far enough to protect agriculture. Under the Land Use and Policies section.

9) There are also concerns that placing solar on ag land leads to a loss of long term ag jobs being replaced with only short-term construction jobs not filled by locals. Not adequately addressed in the Socioeconomics section of the DRECP

Chapter III.23 Vol III of VI “Rooftop solar would be a better option. See Solar Done Right..." Construction workers are normally hired by contractors who maintain their own skilled labor force, so that local hiring may be minimal. By contrast, the installation of distributed rooftop solar produces up to 3.5 times as many jobs and local economic benefit.”


See article dated Feb, 25, 2012

10) The Executive Summary pg 14 the Renewable Energy Goals section second item says “locate renewable energy covered by the DRECP on lands with suitable renewable energy resources. The hot Imperial County is not the most suitable location for solar. See the above referenced Solar Done Right article. "Photovoltaic and air cooled concentrating solar plants are less efficient and transmission losses highest when temperatures are high and when the power is needed the most."

11) Page 21 of the Executive Summary under section 2.5 Implementation it lists Compliance monitoring and enforcement. Monitoring of existing renewable energy projects has been woefully inadequate. There needs
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12) Your Socioeconomic and Environmental Justice section III.23 mentions Imperial County is a low-income high minority area. It is also an agricultural region. These are areas that are purposely targeted by developers for development. See the Cerrell Report. [http://www.einet.org/ei/cerrell.pdf](http://www.einet.org/ei/cerrell.pdf) This is not fully addressed by the DRECP.

13) The fact that solar projects on ag land is making hard for local farmers to find ground to rent or purchase is not sufficiently evaluated by the DRECP.

14) The negative impacts to adjacent fields is not fully discussed.

15) It is being discovered that many solar panels are defective. Solar panels contain many hazardous chemicals. This could pollute our farmlands, deserts and landfills. This is not properly address in the DRECP. [http://www.nytimes.com/2013/05/29/business/energy-environment/solar-powers-dark-side.html?hp&action=click&storyId=](http://www.nytimes.com/2013/05/29/business/energy-environment/solar-powers-dark-side.html?hp&action=click&storyId=)

16) The bonding for these energy projects needs to be a massive amount to cover the cleanup of Toxic waste mentioned above. (possibly 100's of thousands of dollars an acre) If the land was unsalvageable it would be a permanent loss of farmland not a temporary one as CUP’s say.


Thank You,

Carolyn Allen    PO Box 301    Brawley, CA 92227    760-344-1925
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Response to Comment Letter F234

Carolyn Allen
February 23, 2015

F234-1 Thank you for your comment. Your opposition to the DRECP as written is noted. The distributed generation alternative does not meet 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.

F234-2 The Draft DRECP and EIR/EIS had a 5-month comment period (9/23/14 through 2/23/15), which was more than is required for a LUPA.

F234-3 This comment is not relevant to the LUPA and will be addressed in Phase II of the DRECP, as described in Volume I of this Final EIS.

F234-4 This comment is not relevant to the LUPA and will be addressed in Phase II of the DRECP, as described in Volume I of this Final EIS.

F234-5 The effects of solar in term of jobs was address in Volume IV, Chapter IV.23. Chapter III.23 addresses the affected environment. The distributed generation alternative does not meet 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.

F234-6 The BLM has taken this comment into consideration in developing the BLM LUPA and Final EIS. As described in Volume I, Chapter I.0, Phase I of the DRECP is the BLM LUPA and Final EIS that addresses activities on BLM-administered lands only. See also Volume II, which includes revised descriptions and mapping for the range of alternatives considered for the BLM LUPA, including substantial reductions in DFAs as compared to that proposed for the Plan-wide Draft DRECP alternatives especially in the agricultural lands of the Imperial Valley.

F234-7 The BLM has taken this comment into consideration in developing the BLM LUPA and Final EIS. See also Volume II, Section II.3.7 for a description of LUPA implementation. See also Section II.3.7 for a description of the monitoring and adaptive management program for the BLM LUPA and Final EIS.

F234-8 Impacts due to loss of agriculture land are addressed in the Draft DRECP and EIR/EIS in Volume IV, Chapter IV.11, Agriculture Land and Production. The Final EIS only addresses indirect effects to agriculture lands due to development on BLM land as it does not address direct effects of the DRECP.
on private land. This will be addressed in Phase II of the DRECP, as described in Volume I of this Final EIS.

F234-9 This comment is not relevant to the LUPA and will be addressed in Phase II of the DRECP, as described in Volume I of this Final EIS.

F234-10 Typical impacts related to solar energy development and operation, as well as impact analysis of the Proposed LUPA actions on public health and safety, are provided in Volume IV, Chapter IV.22.

F234-11 While this comment has not resulted in a change in the document, the BLM has taken it into consideration. Impacts to the Salton Sea are addressed in Volume IV, Chapter IV.7, Biological Resources.

F234-12 While this comment has not resulted in a change in the document, the BLM has taken it into consideration. Volume IV, Chapter IV.3, Meteorology and Climate Change, addresses the greenhouse gas emissions resulting from land use change.

F234-13 See response F234-6.