February 7, 2015

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW 80-01
1516 Ninth Street
Sacramento, CA 95814-5512
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To the California Energy Commissioner:

I appreciate the opportunity to offer comments on the Draft Desert Renewable Energy Conservation Plan (DRECP). I am a recently retired resident of Joshua Tree.

The current DRECP draft is outdated. The renewable energy industry leaders as noted by NRG Energy CEO David Crane informs us to find another direction away from the utility scale renewable energy projects on large undisturbed tracks of land. We now have information and experience to see more clearly to create a more sustainable energy future.

I strongly reject the Desert Renewable Energy Conservation Plan ("DRECP") as a critical part of the effort to site renewable energy projects in the desert and provide for the conservation of the desert ecosystem. It is clear since the Plan was written that the most efficient permitting process for renewable energy projects is rooftop solar. The California Energy Commission (CEC) rejected rooftop solar without ever doing a detailed analysis of it as an alternative. The CEC needs to perform a detailed analysis of rooftop solar as an alternative in its Desert Renewable Energy Conservation Plan, otherwise please remove the word Conservation.

Rooftop solar technology has progressed significantly during the past five years since the Plan was initiated. Given these advances, rooftop solar should be added to the plan on its technological and economic merits, rather than being dismissed because it is not utility-scale production in the desert.

Biologists inform us fragile deserts evolve their wildlife, plants and ecology over many thousands of years going through cycles of wet and extremely dry years. What lives in the desert is a miracle and a testament of survival of species which in one day can be wiped out for generations beyond our lifetime. Instead of massive bulldozing of fragile desert ecosystems and fragmentation of dedicated environmentally caring rural communities, the proposed alternative of rooftop solar utilizes the California Energy Efficiency Strategic Plan, which is already state law. Enough rooftop and parking lot sites exist to more than fulfill the California electricity need, as well as pushing for more energy efficiency to save energy.

During the past 5 years, large-scale renewable energy projects have destroyed the landscape of the California Desert region. It is now clear regarding the serious problems that arise when streamlining of very large projects takes place by greedy corporate entities who have no investment nor understanding of life in the desert. The use of "adaptive management" mitigation has been based on finding solutions to problems that arise after approval, and should be considered a last resort, not a standard operating practice because of rushed and inadequate permitting processes.
Problems witnessed from recent large-scale projects are the lessening of desert tortoise populations, a blade throw from a large wind turbine in a public place, unmitigated large amounts of fugitive dust from construction that reaches local populations irritating lungs, tortuous bird kills from large scale mirrored solar projects and wind turbines, much lower energy output than that promised in application documents, much higher energy costs than anticipated, and requests by these utility projects for increased water and natural gas use. This is not a sustainable action when other clean alternatives exist! This level of damage makes no sense, and there is no reason for ongoing and expanding harm to our natural heritage simply to produce renewable power that can more efficiently and reliably be produced at or very near load centers via rooftop solar.

The agencies involved have a unique conservation opportunity within the framework of the DRECP to choose an alternative that utilizes the built environment for sustainable, reliable, local solutions to California’s renewable energy needs. Please seriously consider rooftop solar as the first option to provide renewable energy to both cities and rural areas.

As someone else noted, more renewable energy is available from rooftop solar in San Diego and Los Angeles Counties than will be derived from the siting of utility-scale generating facilities on 2 million acres of fragile desert habitat called for in the Desert Renewable Energy Conservation Plan. As previously noted, the unintended consequences of utility-scale facilities in the desert are becoming well known and are unacceptable: dust storms in Lancaster; mistair incineration of birds at Ivanpah; depletion of scarce groundwater in Borrego Springs.

Large scale Solar Farms turn the surrounding communities into a wasteland. Destruction spreads beyond these utility based solar constructions which are deathtraps for birds in a wildlife corridor. Residents will lose property values, the area will lose tourism and businesses lose customers and all forms of wildlife lose their fragile native habitat. Tourists do not visit Joshua Tree and its quirky environment to witness technology, quite the opposite, the area is a refuge for peace and co-existence of the human community with native wildlife and plants in the desert.

Water will not be conserved. In the desert frequent high winds blow debris and sand on the panels which then need to be washed with local drinking water! It is estimated that the solar farm planning to be erected in Joshua Tree will use twice the amount of water that all local residents use in a year which will drain the already fragile aquifers! This is crazy short term thinking.

Rooftop solar minimizes transmission loss using already developed space. Until we use all the available rooftops please keep these utility based nightmare solar farms out of the fragile desert.

Praying wisdom prevails,

Patricia Horwath
Resident of Joshua Tree, CA

*All things by immoral power, near or far, hiddornly to each other linked are that thou cannot disturb a flower without the waving of a star...* Francis Thompson
Response to Comment Letter F84

Patricia Horwath
February 7, 2015

F84-1 This comment has not resulted in a change to the document but the Bureau of Land Management (BLM) has taken it into consideration. 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.

F84-2 Your observations regarding impacts of large-scale projects are noted. This comment has not resulted in a change to the document but the BLM has taken it into consideration. Please see response F84-1 regarding distributed generation.

F84-3 This comment has not resulted in a change to the document but the BLM has taken it into consideration. Please see response F84-1 regarding distributed generation.

F84-4 This comment has not resulted in a change to the document but the BLM has taken it into consideration.

F84-5 This comment has not resulted in a change to the document but the BLM has taken it into consideration.

F84-6 This comment has not resulted in a change to the document but the BLM has taken it into consideration. Please see response F84-1 regarding distributed generation.
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