



California Wind Energy Association

September 7, 2010

Armand G. Gonzales
Special Advisor
Ecosystem Conservation Division
California Department of Fish and Game
1416 Ninth Street, 12th Floor
Sacramento, CA 95814

Re: Renewable Energy Executive Order - Docket No. 09-Renew EO-01
Revised Mitigation Target Area Map for Interim Mitigation Strategy

Dear Mr. Gonzales,

Thank you for giving me the opportunity to review the revised Mitigation Target Area (MTA) map, dated August 2010, associated with the Interim Mitigation Strategy for the Desert Renewable Energy Conservation Plan (DRECP). CalWEA greatly appreciates the Department of Fish and Game's (DFG) responsiveness to the concerns expressed in our July 30, 2010, comments regarding the first draft of the MTA map.

While the revised MTA map no longer affects the four active wind project development areas that we previously identified, it now poses significant concerns for wind energy development in two other areas within the DRECP planning area. It is very important that this planning process take into account the primary wind resource areas of California and the MTA areas avoid lands containing high wind resource potential.

In general, we urge the DFG to use a wind resource map overlay in its planning efforts so that all existing wind power projects and undeveloped wind resources of Class 5 and higher (measured at 80 meters above ground) are avoided entirely at this early stage in the DRECP process. (See wind overlay map, attached.) Specifically, CalWEA is concerned about two areas of active commercial development – the San Geronio Pass / Palm Springs area and Highway 40 South of Ludlow -- that are identified as MTA areas and we respectfully request that the DFG remove these areas from the MTAs.

San Geronio Pass / Palm Springs – Many existing wind power projects and infill wind project sites in this historical development area are designated as MTAs. While existing wind project areas are not appropriate for acquisition for conservation purposes for obvious reasons, vacant areas surrounded by operating wind projects (“infill sites”) are logical areas for development that should be encouraged. Indeed, the Independent Science Advisors report acknowledges and appears to accept the likely clustering of renewable energy developments. Further, many of the sites in this wind resource area are

older wind power sites that are primed for re-powering, at which time these infill sites are likely to be utilized. These considerations make designation as MTA's inappropriate for the foreseeable future. We are unable to specifically identify the location of the affected areas because of the gross nature of the MTA map. With a finer-grain map, however, we could provide you with more specific information on the project areas affected by the boundaries of the proposed MTA (although they would become apparent to DFG if a wind resource map overlay is used).

A larger concern with the inclusion of this area within an MTA is that it is already subject to the Coachella Valley Multiple Species Habitat Conservation Plan. It was our understanding, based on previous conversations with DFG officials, that this HCP – itself a product of over a decade of work -- would be incorporated wholesale into the DRECP, and not changed. Wind project development areas within the MSHCP area have already been restricted and it would be particularly inappropriate to eliminate additional areas as part of the DRECP.

Highway 40 South of Ludlow -- The lands south of Interstate Highway 40 near the Town of Ludlow contain substantial wind energy resources under active development. Inclusion of these lands within an MTA would be contrary to the DRECP's goal of encouraging renewable energy development in previously disturbed areas neighboring established transmission routes. This area is traversed by a designated transmission corridor, and is heavily disturbed by the Town of Ludlow, a railroad and rail yard, U.S. Route 66, a mine access road, and various other disturbances associated with more than 110 years of local industrial, commercial and residential activities.

Of particular concern to CalWEA is the inclusion of Section 7 of Township 7 North, Range 8 East within a proposed MTA. Section 7 includes prior railroad and access road disturbance, a designated transmission corridor under Section 368 of the Energy Policy Act of 2005, and is subject to approved Bureau of Land Management wind energy right-of-way number CACA 48677, which the BLM issued to one of CalWEA's members. In addition to its wind resource value, Section 7 provides critical road and transmission line access points for right-of-way number CACA 48677 because of its proximity to the Town of Ludlow, Interstate Highway 40 and the designated transmission corridor. By obtaining a wind energy right-of-way over previously disturbed lands in close proximity to developed lands, highways and an existing transmission corridor, our member has come as close to meeting the "no regrets" recommendations of the DRECP Independent Science Advisors as one could hope. Relegating it to MTA status would frustrate the goals and purposes of the DRECP.

In short, an MTA designation for BLM right-of-way CACA 48677 and all other lands south of Interstate Highway 40 near the Town of Ludlow (which also have high wind energy potential) would obviate the DRECP's goal of encouraging renewable energy development in previously disturbed areas neighboring established transmission routes.

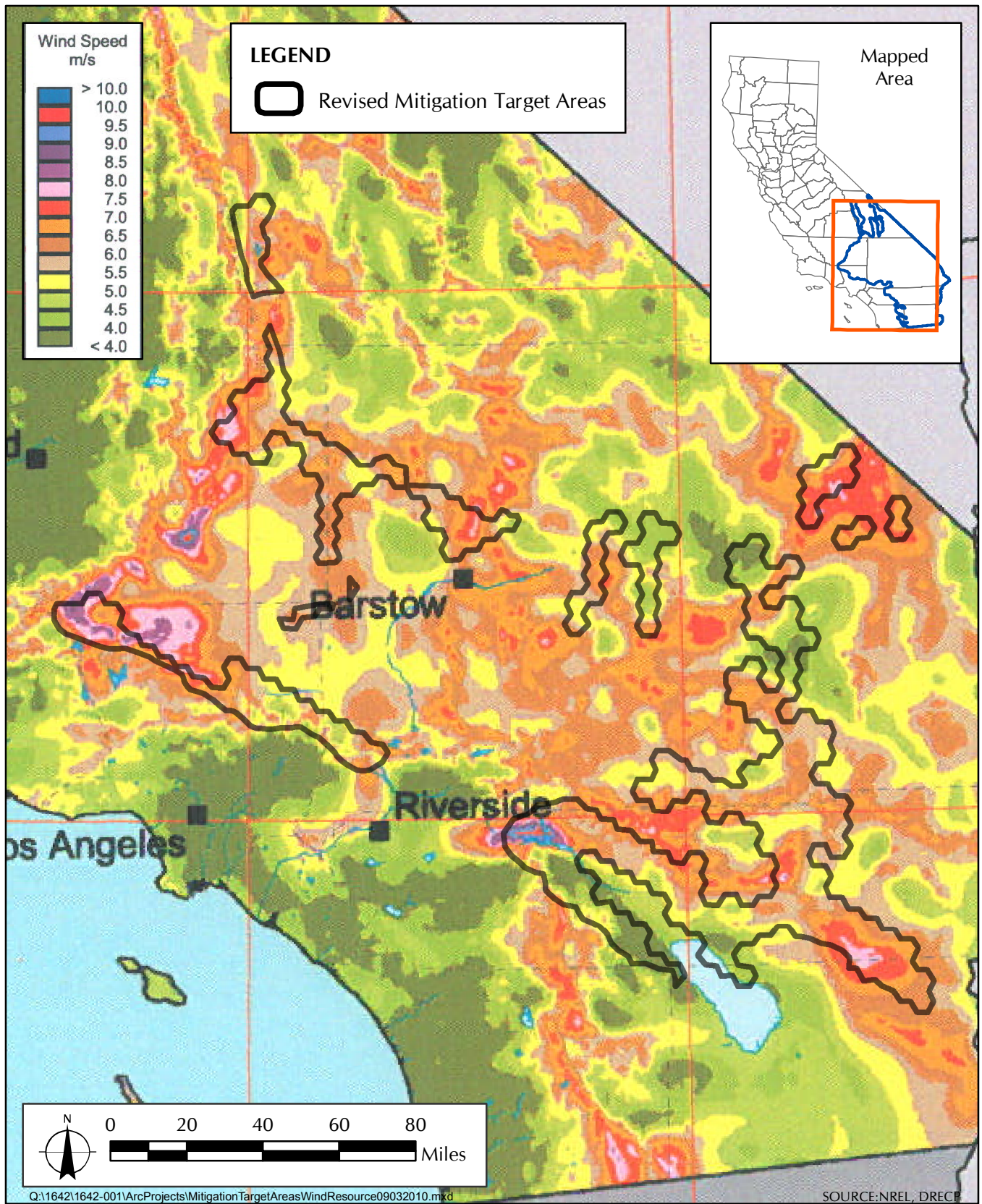
Again, we respectfully request that all existing wind energy projects and undeveloped wind resource areas of Class 5 and higher (measured at 80 meters above ground) be avoided entirely in any MTA, particularly the two areas of active commercial development described above.

Sincerely,



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cc: David Harlow, Director, DRECP
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DRECP Proposed Mitigation Areas in Relation to 80-meter Wind Resource