

January 10, 2017

From: Morongo Basin Conservation Association  
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To: California Energy Commission

Subject: Renewable Energy Transmission Initiative 2.0  
Public Review Draft

Thank you for this opportunity to comment on the Renewable Energy Transmission Initiative 2.0 Public Review Draft. However, this opportunity to comment and the deadline are not clearly posted for public reviewers. It was necessary for this writer to find and open the Jan 3 Webinar document where, under the Purpose of this meeting is a bullet point to "invite written comments on the draft report (due January 10)." There is no other mention of the closing date that I could find. Were this an invitation to a party there would be few in attendance. You can do better and **we request** giving a break to those already burdened with too much to research, reflect, and comment on. Please post review and comment deadlines on the RETI home page.

**Webinar Slide #4: "RETI 2.0 is Not: A preference for utility-scale renewable energy over other strategies to meet renewable energy and GHG reduction goals."**

**Comment:** In this review, yes it is. The December 16, 2016 Public Review Draft mentions the alternatives of rooftop solar and distributed generation (DG) once each under the important descriptor phrases *key driver* and *enhanced flexibility*.

"The California Agencies' PATHWAYS identified several *key drivers* affecting both energy demand and GHG reduction. The most significant of these drivers were:

- Growth in behind-the-meter photovoltaics and distributed generation that reduces (and shifts the timing of) the peak demand that must be met by the utility." (Page 15)

"Key findings for reducing emissions from the electric power sector by 2030 emphasize the benefits of *enhanced flexibility*, which includes:

- A technologically and geographically diverse renewable energy portfolio, including grid-scale PV solar, rooftop solar, regional wind, geothermal, biomass, and concentrating solar power with thermal storage." (Page 23)

However, the Public Review Draft Conclusion only states that "renewable energy potential of low-cost, utility-scale solar photovoltaic (PV) is cost competitive across much of California." (Page 13)

There is no mention in the conclusions of the cost competitiveness and *enhanced flexibility* of that *key driver* rooftop solar, which does not require expensive land gobbling transmission lines.

Desert communities want a high energy-efficient future for the state but with much less acreage devoted to utility-scale solar projects and large transmission lines. Desert communities do not want industrialization of the California Desert, one of the most intact ecosystems in North America.

To achieve this goal requires an increase in net-metering and feed-in tariffs to allow more people to obtain rooftop solar. **We request** that Distributed Energy Resources be given much more analysis in high-level planning.

In addition, the electricity carried on existing lines can be increased using advanced transmission technology, such as increased capacity conductors. **We request** that new technology be given more analysis in the advance planning for new transmission lines, which may ultimately not be needed.

**Comment:** **We request** that the Environmental and Land Use Technical Group (ELUTG) make public the planning process for environmental, cultural, and land use implications for the 50% RPS planning process and analyze how the DG alternative would have much less impacts to deserts, viewsheds, local communities, and cultural and biological resources.

**Comment:** The Riverside TAFE assumes 4000 MW of solar energy is feasible based on extensive land-use planning on BLM land through the DRECP and Western Solar PEIS. However, The Riverside TAFE is located on an incompletely analyzed sand transport corridor.

**Air Quality and groundwater use** for solar development along sand transport corridors are not adequately analyzed nor can they be because the Mojave Desert AQMD and South Coast AQMD (east of Salton Sea do not have monitoring stations for PM10 and PM2.5. Frequent watering is the BMP for controlling fugitive dust. You can't know one (water) without knowing the other (dust). Particulate matter for Soda Mountain Solar was calculated using the Victorville monitoring station, as were the Cascade and NextEra Solar Projects in Joshua Tree. Victorville does not share the same soils, stabilizing plant community, or air currents, so the analysis was fatally flawed. The furthest east MDAQMD monitoring station is on the 29 Palms Marine Base with a limited range of 30 miles. What difference does this make? All solar energy projects developed in Riverside along the I-10 from Hwy 177 east to Blythe, are on a sand transport corridor. Previous studies account only for the sand habitat of the fringe-toed lizard and state they do not analyze for dust emissions. Dust emission along the I-10 will, among other outcomes, be cumulative with the dust from the shrinking Salton Sea. Planning documents do not and cannot correctly provide PM10 and PM2.5 base level emissions, or emissions during winds in excess of 15mph without local monitoring stations. **We request** that the FLUTG acknowledge the DRECP and PEIS lack of realistic air quality and groundwater studies under NEPA and CEQA when analyzing for additional transmission lines. Land use planning for that 4,000 MW of solar energy is not complete.

Thank you again for this opportunity to comment.

Sincerely,



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