

County of Riverside

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SUPERVISOR ROY WILSON FOURTH DISTRICT

November 19, 2008

California Energy Commission
Attention: Clare Laufenberg Gallardo
1516 Ninth Street, MS 46
Sacramento, California 95814

Subject: The Renewable Energy Transmission Initiative (RETI) Draft Phase 1B Report

Dear Ms. Gallardo,

According to the Preface in the Executive Summary of the RETI draft report, "RETI is a collaborative stakeholder planning process." From my perspective, this "collaborative stakeholder" process has not adequately taken into consideration the general public as a stakeholder. I am mainly concerned, of course, about my constituents who may bear a disproportionate burden for the construction and presence in the desert of remote solar arrays. The haste of unveiling the draft report on Nov. 5 and closing comments a mere two weeks later effectively shuts out most public comment.

"Stakeholders" implies in this case, everyone, but the public has not been adequately notified. The public is, in fact, largely unaware of this process. In addition, the environmental community is divided on the concept of remote solar arrays, a fact which is not addressed in the RETI draft report.

Moreover, I believe the entire RETI process may be *fundamentally* flawed by its emphasis on transporting energy from remote generating sites, which is an inherently inefficient practice. Since solar energy in particular is well-suited to rooftop applications which are much more environmentally sound, the report should give greater consideration to this alternative.

More specific to the details of the report: The Competitive Renewable Energy Zones should not provide for new facilities that impact state or federal areas previously set aside to protect biological, cultural and other resource values. In addition the State of California and local governments have spent many years and significant funds in developing Natural Community Conservation Plans and Multiple Species Habitat Conservation Plans. Proposed CREZs should not impact areas designated for conservation under these plans, because to do so would have a devastating effect on these carefully-executed and delicate plans.

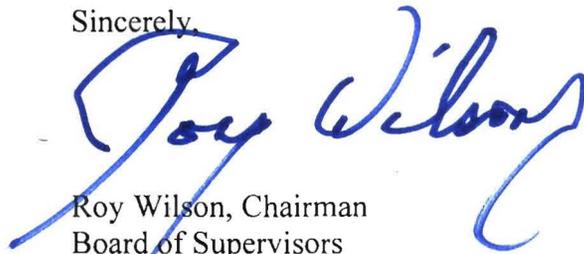
California Energy Commission
Attention: Clare Laufenberg Gallardo
November 19, 2008
Page 2

The report also asserts that the environmental criteria were designed to identify those CREZs which “maximize the use of previously disturbed lands.” But evidently the group failed to reach consensus on what constitutes “disturbed,” so the effort to identify and evaluate disturbed lands was undermined. We encourage RETI to revisit this issue and perform a comprehensive evaluation so that areas with low social and environmental value receive the highest priorities for renewable energy resource development.

In addition, the report assumes the state’s electrical load will greatly increase by 2020, ignoring the likelihood of significant gains in advancing conservation technologies. The report also assumes that the controversial Sunrise Powerlink and Green Path projects will provide increased transmission capacity in the near future, but both of these projects may never move forward.

I request on behalf of my constituents—nearly a half million impacted desert residents—that you extend the RETI process until the public has had sufficient time and sufficient information to adequately respond.

Sincerely,



Roy Wilson, Chairman
Board of Supervisors
County of Riverside