

February 23, 2015

California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

**DRECP NEPA/CEQA  
DRAFT ENVIRONMENTAL IMPACT REVIEW (DEIR)  
DESERT RENEWABLE ENERGY CONSERVATION PLAN (DRECP)  
BUREAU OF LAND MANAGEMENT, U.S. FISH AND WILDLIFE SERVICES,  
CALIFORNIA ENERGY COMMISSION, AND CALIFORNIA DEPARTMENT OF FISH  
AND WILDLIFE AGENCIES**

Thank you for the opportunity to review the DEIR for the DRECP. The DRECP is to provide renewable energy and transmission development projects and for the conservation of sensitive species and ecosystems in California's Mojave and Colorado/Sonora deserts. The DRECP addresses the conservation of covered species, habitats, and natural communities, as well as to the physical, visual and social resources in the plan area. In addition, The DRECP is to streamline future permitting efforts for the development of renewable energy in the plan area to help meet California's Renewables Portfolio Standards (RPS) California's greenhouse gas emission reduction targets and other state and federal renewable energy and transmission goals. The DRECP considers renewable energy facility developments in the desert over the next 25 years and through strategic habitat conservation, provides an ecosystem approach to impact mitigation and landscape-level natural resources conservation. The plan area covers approximately 22,585,000 acres in the Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino, and San Diego Counties. The plan boundary includes the northern portion of Los Angeles County including the Angeles National Forest and the Antelope Valley Area.

**The following Los Angeles County Department of Public Works' comments are for your consideration and relate to the environmental document only:**

### **Air Quality**

1. Section IV.2.2.1.2 Impacts of Construction and Decommissioning Areas, Page IV.2-5; We recommend to revise the first paragraph as follows:

“The typical air impacts from construction and decommissioning activities are from fugitive dust from grading (*where allowed by the local agency*), vehicles driving on unpaved surfaces or roadways, and emissions from heavy-duty construction equipment and vehicles carrying construction materials and workers. These emissions occur during site development and preparation, transmission line development, building and roadway construction, and during decommissioning and facility removal. The types of emissions would be the same for each renewable energy technology. An in-depth list of activities is in Volume II, Sections II.3.1.3.1 to II.3.1.3.4.”

Please note that Los Angeles County requires all renewable energy projects to minimize the fugitive dust by imposing grading activity restrictions. Grading is typically limited to *only the access roads, substations, tanks, inverter pads, and basins*.

If you have any questions regarding the air quality comments, please contact Mr. Ruben Cruz of Land Development Division at (626) 458-4910 or [rcruz@dpw.lacounty.gov](mailto:rcruz@dpw.lacounty.gov).

### **TRANSPORTATION AND PUBLIC ACCESS**

1. We recommend that the DEIR discuss the feasibility of undergrounding proposed transmission lines that will ultimately serve a proposed renewable energy site. Please note that the County of Los Angeles currently requires that new transmission lines be placed underground whenever physically feasible to minimize environmental and visual impacts.

If you have any questions regarding the transportation and public access comment, please contact Ruben Cruz of Land Development Division at (626) 458-4910 or [rcruz@dpw.lacounty.gov](mailto:rcruz@dpw.lacounty.gov)

If you have any other questions or require additional information, please contact Mr. Ruben Cruz of Land Development Division at (626) 458-4910 or [rcruz@dpw.lacounty.gov](mailto:rcruz@dpw.lacounty.gov).

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