California Desert Renewable Energy Working Group

October 16, 2014

Karen Douglas
Commissioner
California Energy Commission
1510 Ninth Street
Sacramento, CA 95814

Charlon H. Bonham
Director
California Department of Fish and Game
1410 Ninth Street
Sacramento, CA 95814

James G. Kerma
State Director, California State Office
Bureau of Land Management
2800 Cottage Way
Sacramento, CA 95825

Ron Lohoeferen
Regional Director, Region 8
U.S. Fish and Wildlife Service
2800 Cottage Way
Sacramento, CA 95825


Dear Commissioner Douglas, Director Bonham, Director Kerma, and Director Lohoeferen:

On behalf of the undersigned organizations and companies, members of the California Desert Renewable Energy Working Group, we respectfully request a 60-day extension of the comment period for the Draft Desert Renewable Energy Conservation Plan (DRECP) and Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR), California, 79 Fed. Reg. 57971 (September 26, 2014) so that we may develop meaningful and constructive joint comments. We also request that the draft Implementation Agreement be released for public review during this comment period for at least 60 days before the end of the comment period for the DRECP Draft EIS/EIR.

The California Desert Renewable Energy Working Group, a dialogue between representatives of the renewable energy industry, the electric utility sector, and the environmental community, seeks to protect ecosystems, landscapes, and species while supporting the timely development of appropriately sited renewable energy resources on public and private lands in the California desert. Our aim is to protect ecosystems, landscapes, and species while supporting the critical, timely, and appropriate development of renewable energy resources in the California desert.

On September 26, 2014, the California Energy Commission, California Department of Fish and Wildlife, the Bureau of Land Management, and U.S. Fish and Wildlife Service (agencies) announced the availability of the DRECP and accompanying documents. The DRECP covers 22.5 million acres of public and private land in the desert regions and adjacent lands of seven California counties - Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino and

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San Diego. The Draft DRECP and associated documents total more than 8,000 pages of detailed information and analysis.

We appreciate that the agencies have provided a 50 day public comment period. However, we have identified a number of critical and complex issues which will require more time for sufficient analysis, including, but not limited to:

- Biological Goals and Objectives and associated Conservation Management Actions
- Legal and governing structure of the plan
- Transmission
- Funding for plan implementation
- Development pathways and permitting
- Energy projections
- General Conservation Permit/Endangered Species Act Standards
- Special Study Areas and Future Study Areas
- Multi-technology DFAs

We would also like to re-iterate our strong interest in additional webinars presented by the DRECP agencies on the topics of: transmission, funding, development pathways, and conservation designations and management. These webinars will be extremely helpful in our comment development.

Granting our 60-day extension request will allow our organizations and companies, as well as all interested stakeholders, a more sensible time frame to develop useful and substantive comments for the agencies to consider.

In addition the agencies have yet to release the draft Implementation Agreement for the DRECP, which should also be subject to public review and comment at the same time as the Draft DRECP and Draft EIR/EIS in order to allow for the public to develop informed comments on the potential impacts of the proposed plan. Cal Fish and Game Code 2815. The Implementation Agreement sets forth the legal structure and obligations of the implementing agencies under the plan and is a critical component to understanding how the plan will be carried out.

For these reasons, we request that the comment period on the draft DRECP and EIR/EIR be extended for 60 additional days and that the draft Implementation Agreement be released for public review during this comment period for at least 60 days before the end of the comment period.

We appreciate the agencies’ serious consideration of our requests and look forward to your response.

Respectfully submitted,

[Signatures]

Frederick Reddell
Abengoa Solar, Inc.

Gary George
Audubon California

Joseph Desmond
BrightSource Energy
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Response to Comment Letter E12

California Desert Renewable Energy Working Group
Lisa Belenky
January 22, 2015

E12-1 Thank you for your comment. No change in the document is required as a result of this comment.

E12-2 While this comment has not resulted in a change in the document, the BLM has taken it into consideration. Extensive public outreach and information sharing was conducted during the comment period.

E12-3 While this comment has not resulted in a change in the document, the BLM has taken it into consideration. The Draft DRECP and EIR/EIS had a 5-month comment period (9/23/14 through 2/23/15), which included one extension, and no recirculation of the draft document will occur.

E12-4 See response E12-3. Also, the Implementation Agreement is not relevant to Phase I of the DRECP, which pertains to the BLM LUPA.
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