February 20, 2015

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
Email: docket@energy.ca.gov

Subject: Request for a new Desert Renewable Energy Conservation Plan Alternative

Spreckels Sugar Company respectfully submits the following comments to the Desert Renewable Energy Conservation Plan preferred option plan.

The DRECP preferred option fast-tracks and streamlines permitting of alternative renewable energy projects in the Imperial Valley on agricultural land; these projects will transmit and supply areas outside of the Valley with power to the detriment of Imperial Valley residents and economy. The unemployment rate in Imperial County is approximately 25%, and National Beef in Brawley recently closed its doors laying off 1400 people. With a finite number of available acres devoted to agriculture, even removing a small number of agricultural acres (including “marginal” farmland) can create the economic tipping point that forces businesses such as ours to close. Alternative/renewable energy projects reduce and eliminate long-term employment by employing only temporary (and many “out of area”) workers during the short term construction phase. While we all support renewable energy, the impact to the future of agriculture in the Imperial Valley is at stake, as are the economic futures of Imperial Valley workers, businesses and public services.

Please help us protect the economic viability of the Imperial Valley by not sacrificing our agricultural land for outside area use for alternative energy projects.

Sincerely,

Gary Hamlin
Regional Manager
Spreckels Sugar Company
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Response to Comment Letter E35

Spreckels Sugar Company, Inc.
Gary Hamlin
February 20, 2015

E35-1 This comment is not relevant to the BLM LUPA and will be addressed in Phase II of the DRECP, as described in Volume I of this Final EIS.

E35-2 This comment is not directed toward any specific discussion or the analysis presented in Draft DRECP and EIR/EIS Chapters III.23 or IV.23 (Socioeconomics and Environmental Justice). This is a general comment or opinion that BLM has considered.