October 10, 2014

Karen Douglas
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Charlton H. Bonham
Director
California Department of Fish and Game
1416 Ninth Street
Sacramento, CA 95814

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


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

On behalf of the undersigned organizations, we respectfully request a 30-day extension of the comment period for the Draft Desert Renewable Energy Conservation Plan (DRECP) and Draft Environmental Impact Statement/Environmental Impact Report (Draft EIR/EIS), California, 79 Fed. Reg. 57971 (September 26, 2014). We also request that the draft Implementation Agreement is released for public review during this comment period for at least 60 days before the end of the comment period.

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 Draft 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 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 90 day public comment period. However, we do not believe that given the volume and complexity of the Draft DRECP and various environmental documents a 90 day public comment period is sufficient time to review this information and provide detailed and meaningful public comment. Granting our 30-day extension request will allow our organizations, 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 still need 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.

For these reasons, we request that comment period be extended for 30 additional days and that the draft Implementation Agreement is 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,

Jordan Kelly
Amargosa Conservancy

Garry George
Audubon California

Greg Suba
California Native Plant Society

Ryan Henson
CalWild

Ilene Anderson
Center for Biological Diversity

Sam Goldman
Conservation Lands Foundation

Kim Delfino
Defenders of Wildlife

Danielle Segura
Mojave Desert Land Trust

Dennis Schramm
Mojave National Preserve Conservancy

David Lamfrom
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Helen O’Shea
Natural Resources Defense Council

Laura Crane
The Nature Conservancy
Drew Feldmann  
San Bernardino Valley Audubon Society  

Barbara Boyle  
Sierra Club  

Sally Miller  
The Wilderness Society  

April Sall  
The Wildlands Conservancy
Response to Comment Letter E3

Jordan Kelly (Amargosa Conservancy), Garry George (Audubon California), Greg Suba (California Native Plant Society), Ryan Henson (CalWild), Ileene Anderson (Center for Biological Diversity), Sam Goldman (Conservation Lands Foundation), Kim Delfino (Defenders of Wildlife), Danielle Segura (Mojave Desert Land Trust), Dennis Schramm (Mojave National Preserve Conservancy), David Lamfrom (National Parks Conservation Association), Helen O’Shea (Natural Resources Defense Council), Laura Crane (The Nature Conservancy), Drew Feldmann (San Bernardino Valley Audubon Society), Barbara Boyle (Sierra Club), Sally Miller (The Wilderness Society), April Sall (The Wildlands Conservancy)

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E3-1  Thank you for your comment. No change in the document is required as a result of this comment. 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 or a supplemental document will occur.