The Draft DRECP is an extremely difficult document to analyze, understand, and ultimately fully evaluate. However, based on our understanding, the Draft DRECP as written provides questionable tangible benefit to renewable energy development and instead introduces significant uncertainty into the already-challenging development process. The Draft DRECP is inconsistent with the Wind Energy Guidelines (WEG) risk-based, tiered development approach favored by the U.S. Fish and Wildlife Service and limits development to unsubstantiated and overly-restrictive go/no-go areas in lieu of a more appropriate criteria-based methodology. Additionally, the Draft DRECP’s newly created streamlined permit process does not yield any substantial benefit to the existing permitting processes but it does create a great deal of ambiguity as it relates to time-tested NEPA and CEQA requirements—thus exposing the implementing agencies as well as renewable energy developers to legal challenge.

If the Draft DRECP is approved in its current form it will hinder California’s push toward a clean energy future and undermine U.S. Department of Interior and Bureau of Land Management efforts to help promote and expedite prudent renewable energy development on Federal lands. Absent a significant change to the approach being taken in the Draft DRECP,
Iberdrola Renewables believes the no action alternative (i.e., "status quo") provides a more consistent and understood set of requirements, greater flexibility to include on-the-ground data and/or changes to technology over time, and fewer uncertainties than those demonstrated in the Draft DRECP. A supplemental or revised EIS/EIR is needed to address these substantive flaws in the Plan. As a participant in the process from the inception of the plan, we remain willing to actively participate in the modification of the Draft DRECP into a plan that could be more widely supported by multiple parties and which adequately addresses these renewable energy development concerns shared by us and other stakeholders.

Sincerely,

[Signature]
Jesse Groner
Managing Director, Business Development
Response to Comment Letter E46

Iberdola Renewables
Jesse Gronner
February 23, 2015

E46-1 Thank you for your comment. No change in the document is required as a result of this comment.

E46-2 Following release of the Draft DRECP and in response to public comments received from a diverse group of stakeholders, the REAL Agencies (i.e., Bureau of Land Management [BLM], U.S. Fish and Wildlife Service [USFWS], California Energy Commission, and California Department of Fish and Wildlife [CDFW]) have adjusted the planning process and are employing a phased approach for the DRECP: one phase addressing BLM lands and another phase addressing non-federal lands. Under Phase I of the DRECP, the DRECP BLM LUPA and Final EIS addresses land uses, including renewable energy and transmission development, on BLM-administered lands only. See also Volume II which includes revised descriptions and mapping for the range of alternatives considered for the BLM LUPA.

E46-3 See response E46-2; the BLM LUPA and Final EIS addresses activities on BLM-administered lands only. See also Volume II, Section II.3.7 for a description of LUPA implementation.

E46-4 No change in the document is required as a result of this comment.

E46-5 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 is needed.