Comment Letter F114

Dear Sirs,

The DRECP draft targets 20% percent solar generation but fails to address where California is currently at or what we need to do to meet that target. How can we better understand what we need to do to meet the target we have failed to measure where we are currently and what measurement needs to include? We include rooftop and distributed generation.

The current DRECP plan fails to include alternatives such as rooftop commercial buildings, and parking lot solar, distributed generation, energy efficiency, and the setting of renewable energy renewable energy generation such as solar in fully implemented plans to developing large industrial solar farms.

Sincerely,

Chris Steele
Acting Executive Director
San Bernardino County Supervisor

February 22, 2015
The most effective way for renewable energy development is to focus on point-source energy efficiency and solar energy alternatives, thus far more effective and avoids building and maintaining hundreds of miles of new transmission lines that cause their own very significant environmental problems.

Broad economic benefits can be derived from reducing electricity usage and demand rather than adding high cost, large-scale remote utility projects with long transmission times.

We now have well-documented evidence of the serious problems that arose from large-scale projects. We need to step back, rethink where we are in attaining our 2020 renewable goal and then plan the least destructive alternatives.

Sincerely,

Victor Fuller

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Attachment 2. Places that require conservation in the Preferred Alternative of the DRECP

- Anza-Borrego Desert State Park
- Big Morongo Mountains and surrounding lands
- Bristol Lake (excluding mineral heating and coal mining areas)
- Cadiz Valley/East Mountains
- Chalk Hills
- Cross Range area (including Bancroft Dunes – not including OHV area)
- Death Valley
- Desert Tortoise Natural Area (DTNA)
- Desert Mountain
- Russet critical habitat
- Joshua Tree woodland and shrub
- Lower Colorado Flat
- Luray Canyon woodland
- Malapais Mesa (excluding northwestern Tule City Hills, Santa Rosa Plateau Conglomerate Mesa
- Microphyll woodland
- Mountain haren woodland
- Male Mountains
- Nevada Mountain area
- Palisades
- Panoche Mountain area
- Pinyon Valley (ATCE)
- Red Mountains
- Riparian areas
- Rendless Mountain area
- Redwood Mountains area (excluding scree and kilns: Winkler West)
- Reno Valley/Weaver Flat area in BLM
- Sacramento Mountains
- Shoshone Valley (including RM and Special Analysis Area and additional acreage)
- Soda Mountain
- Soda Mountain (south slope)
- Sponge Cell Hiking Area
- Tulelake Mountains and Southern Sierras – areas of conservation interest
- Valley Mormon
- Whale
- Wildlife Linkages
- Whipple Mountain area
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Response to Comment Letter F114

Victoria Fuller
February 17, 2015

F114-1  Thank you for your comment. Bureau of Land Management (BLM) has taken it into consideration in developing the Desert Renewable Energy Conservation Plan (DRECP) Proposed Land Use Plan Amendment (LUPA) and Final Environmental Impact Statement (EIS). See Section I.3.3 for a description of the renewable energy planning process used for the DRECP, which sets the renewable energy and transmission planning context for developing the DRECP Proposed LUPA and Final EIS for BLM-administered lands. The 20,000 megawatts (MW) assumption used in the Draft DRECP was not just for solar generation and was intended to set the renewable energy planning context for the Draft DRECP.

F114-2  The distributed generation alternative does not meet BLM’s purpose and need. Distributed generation was considered but not carried forward, as discussed in Volume II, Section II.8.2.1.

F114-3  The DRECP is focused on identification of lands potentially suitable for renewable energy development and lands to conserve. While important, promoting energy demand reduction is not within the scope of the DRECP but is an activity undertaken by numerous agencies and organizations.

F114-4  In Phase I, less than 10,000 MW of renewable energy generation is projected on Development Focus Areas (DFAs) under the LUPA. The Preferred Alternative is considered to represent the best approach to achieving BLM’s purpose and need with regard to the DRECP.

F114-5  The BLM has taken this comment into consideration in developing the DRECP Proposed LUPA and Final EIS. See Volume II, which includes revised descriptions and mapping for the range of alternatives considered for the BLM LUPA, including extensive LUPA conservation designations over important ecological and cultural resources and values in the California deserts.
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