Comment Letter F130

Via E-mail: docket@energy.ca.gov and First Class Mail
California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW ED-01
1516 Ninth Street
Sacramento, CA 95814-5512
Re: DRECP NEPA/CEQA

To Whom it May Concern:

As a resident of the High Desert of California, I am concerned about the deserts being
overdeveloped unnecessarily or developed in areas that are not appropriate for large-scale
renewable energy projects. I have the following concerns and comments:

1) Advancements in renewable energy technologies that produce more energy using less
land and the completion of new renewable energy projects have taken place since the
DRECP process was initiated. Thus the acreage needed to fulfill the 33% mandate by
2020 needs to be recalculated. If these projects are included in the calculations they
add up to approximately 11,000 megawatts leaving 3,000 megawatts needed to satisfy
the 20,000 being proposed in the DRECP.

2) I agree with San Bernardino Counties comment that distributed energy on rooftops and
parking lots should also be included in the recalculations. In their Position Paper on the
DRECP they stated that one of their key priorities is to: “Encourage distributed
generation that addresses local needs while allowing excess energy to be sold to the
grid.” Let LA County put renewable energy on their rooftops and parking lots before we
destroy virgin desert lands.

3) I am concerned about the issuance of Take Authorizations allowing the lawful Take of
Covered Species incidental to Covered Activities and for the issuance of Take permits for
“other” species that are not currently listed. It is my understanding that these “take”
authorizations will be extended over long periods of time, a 25-40 year period. This is
unacceptable as our desert flora and fauna are being ever increasingly stressed by
climate change (i.e. increasing drought conditions) and habitat loss due to certain
recreational activities.

Part of what residents of the deserts value the most is the unique flora and fauna.

In conclusion, having a plan for large-scale renewable energy development is a good
thing but having a plan that incorporates the concerns and wishes of the residents it will
affect makes for a great plan.

Thank you for your attention to these concerns and comments.
Susan Stueber
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Response to Comment Letter F130

Susan Stueber
February 23, 2015

F130-1  Thank you for your comment. While it has not resulted in a change in the document, the Bureau of Land Management (BLM) has taken it into consideration.

F130-2  The BLM has taken this comment into consideration in developing the Desert Renewable Energy Conservation Plan (DRECP) Proposed Land Use Plan Amendment (LUPA) and Final Environmental Impact Statement (EIS). See Volume I, 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 Proposed LUPA and Final EIS for BLM-administered lands.

F130-3  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. BLM lands are largely devoid of buildings and distributed generation is applicable in locations with both electrical demand and areas or surfaces available for installation of distributed generation technology.

F130-4  This comment appears to concern the take authorization process proposed by the General Conservation Plan (GCP) component of the Draft DRECP and Draft Environmental Impact Report (EIR)/EIS, which would apply to renewable energy development on non-federal lands. The DRECP Proposed LUPA and Final EIS considers renewable energy development only on BLM-administered lands. Incidental take permitting options for non-federal lands will now be considered in Phase II of the DRECP. Therefore, the DRECP Proposed LUPA and Final EIS does not cover non-federal lands and does not include a GCP component.

F130-5  This comment has not resulted in a change to the document but the BLM has taken it into consideration.