California Energy Commission
Docket Office M54
Docket 09 RENEW ED01
1516 Ninth St
Sacramento, CA 95814-5512

17 February 2015

RE: DRAFT Desert Renewable Energy and Conservation Plan

Dear Sir

As a resident of Lucerne Valley, a taxpayer and voter, I officially request that an alternative be considered for the Desert Renewable Energy Conservation Plan (DRECP). Currently the DRECP has no alternative that accurately reflects existing California state energy priorities that require energy efficiency measures, of all types, including rooftop solar projects, be fully implemented prior to developing large, remote power generation projects of any type.

Also, the DRECP does not incorporate the US Environmental Protection Agency’s Re-Powering America’s Lands Program when siting these large power generation sites. The DRECP draft EIR/EIS states: “Multiple commenters noted that distributed generation, energy efficiency, and the siting of renewable energy on brownfield sites should be considered as components of a single alternative rather than as independent alternatives...” (Section II.B.3).

This failure to consider detailed analysis of viable, cost effective and less harmful alternatives to those listed in the existing draft DRECP appears to violate both National Environmental Policy Act and the California Environmental Quality Act, and may subject the County, the State and the offending corporation, including the public utility, to costly and time consuming legal actions which should be remedied by including a point-of-use, energy efficiency and solar alternative.

Thank You

Wayne Yon
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Response to Comment Letter F151

Wayne Box
February 17, 2015

F151-1  Thank you for your comment. Alternatives considered are described in Volume II. The scope of the Desert Renewable Energy Conservation Plan (DRECP) is limited to management of lands within the DRECP area. State programs, such as those for energy efficiency, are now within the scope of the DRECP and are the responsibility of other agencies. The distributed generation alternative does not meet the Bureau of Land Management’s (BLM’s) purpose and need. Distributed generation was considered but not carried forward, as discussed in Volume II, Section II.8.2.1.

F151-2  See response F151-1. See also Chapter II.8 for alternatives considered but not carried forward.

F151-3  See response F151-1. Also, the DRECP Proposed Land Use Plan Amendment (LUPA) and Final Environmental Impact Statement (EIS) is not a California Environmental Quality Act (CEQA) document.

F151-4  This comment has not resulted in a change to the document but the BLM has taken it into consideration.
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