February 19, 2015

RE: DRECP/CEQA

Dear Sirs,

I have been a property owner in the Victor Valley since 1988. I moved my family here for a rural life style, clean air and simply because I have loved the area since I was a child. My husband and I also owned property in the Tehachapi Mountains. I have seen firsthand the results when technologies become obsolete almost overnight. The Tehachapi Mountains are now littered with defunct wind turbines which there are no plans to have removed. Bigger better turbines tower over the now obsolete turbines. What an embarrassing legacy. All due to the subsidized greed on the part of a few. As it stands now, the DRECP does not provide any way to pay for the decommissioning of utility-scale generating facilities when they become obsolete. This is unacceptable.

The DRECP plan is behemoth document. With over 10,000 pages, it is impossible for it to be truly reviewed by the decision makers. Therefore, it is critical to have public input so that our concerns about its implementation are heard. This is the purpose of my letter. If the DRECP plan is to succeed, it must abandon the single focused approach. The way to achieve successful renewable energy generation does not have to mean the ruination of our rural communities, our desert wild lands or wildlife habitats. Rather, the answer lies in a much less destructive solution: an alternative that includes point-of-use energy generation (rooftop) and embrace energy efficiency measures of all types. Let’s not destroy yet another natural treasure, the Mojave Desert.

Failure to consider detailed analysis of a viable cost effective and less harmful alternative to those listed in the existing draft of the DRECP appears to violate both NEPA and CEQA (federal and state environmental laws). The DRECP’s Renewable Energy Action Team must make the legally (and morally) responsible decision to remedy this potential violation. I, along with many others, recommend this be done by including a Point of Use/Energy Efficiency Alternative in the next draft of the DRECP. The technology exists for a much less invasive approach. Follow the money trail, in the end; it is always about the money meaning Federal Subsidies. As it stands now, the DRECP does not take destruction into account the long range of the significant eco systems that will be impacted to say nothing of the long term

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irreparable done damage that will be done. The DRECP must consider other viable options rather than just utility-scale development.

I am reminded of Hetch Hetchy. A beautiful valley, reputed to be as beautiful as its sister valley, Yosemite. However, the river flowing through it was dammed and the valley filled up with water. A national treasure destroyed, never to be seen again so that the LA Basin could develop even more with the water. The DRECP seems to me to be a parallel situation. The DRECP is forcing adverse environmental impact on rural communities to yet again provide for urban areas miles away. We have the technology not to make this mistake again!

The DRECP would close thousands of acres of public lands to recreational use. The Mojave Desert is a fragile ecosystem and it is the last of an extensive wilderness. Vast arrays of wildlife call this desert their home. The indigenous peoples of our country have passed down a legacy of planning 7 generations out. The DRECP permits the “taking” of already endangered species for 30 years. The thought that my children’s children will not see this pristine treasured area as it has been for generations is heartbreaking and not necessary.

I beseech all the stakeholders and the decision makers to work together to implement a plan that will not destroy our environment. Rather, let’s grasp this opportunity to be a global example of the right way to balance energy needs and ecology with point of use energy generation. We have the technology! Let’s use it.

Sincerely,

Linda Rosson, MA ED
Retired High School Principal
Response to Comment Letter F156

Linda Rosson
February 19, 2015

F156-1  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.

F156-2  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). As described in Chapter I.1, Phase I of the DRECP is the BLM Proposed LUPA and Final EIS that addresses activities on BLM-administered lands only. See Section II.3.4.2 for revised Conservation and Management Actions (CMAs) for activities on BLM-administered lands, including CMAs for decommissioning.

F156-3  The BLM has taken this comment into consideration in developing the DRECP Proposed LUPA and Final EIS.

F156-4  This comment has not resulted in a change to the document but the BLM has taken it into consideration. 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.

F156-5  The BLM has taken this comment into consideration in developing the DRECP Proposed LUPA and Final 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. See also Chapter I.1 for the purpose and need for the DRECP Proposed LUPA and Final EIS.

F156-6  This comment has not resulted in a change to the document but the BLM has taken it into consideration.

F156-7  The DRECP would not close any lands to recreational use. The DRECP would designate Development Focus Areas (DFSa) and is proposing a variety of incentives to steer future renewable energy development to the DFAs, see Section II.3.3.3.1, Development Incentives in DFAs. However, whether any development occurred in these areas would depend on private developers and would be market-driven. The areas would remain open to recreation until such time as they are closed for other uses.

F156-8  This comment has not resulted in a change to the document but the BLM has taken it into consideration.
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