Energy - Docket Optical System

From: Almut Fleck <almutfleck.wv@gmail.com>
Sent: Monday, February 23, 2015 10:41 AM
To: Energy - Docket Optical System
Subject: DRECP NEPA/CEQA

"The purpose of the DRECP is to conserve and manage plant and wildlife communities in the desert regions of California while facilitating the timely permitting of compatible renewable energy projects."

1. The need for electricity will grow with the increase of population and industry. The DRECP does not mention the need for conservation in the sense of "using less". While it seems that solar energy is endless, the space for industrial-size solar is not.

2. Transmission lines that deliver electricity generated in the desert to locations outside the region are less efficient than direct distributed energy, i.e. rooftop solar.

3. No study, I am aware of, has been made of rooftop space available for solar panels and thus truly conserving pristine lands and "plant and wildlife communities in the desert regions." Nor, has there been a study I am aware of, as to how much electricity is being generated already by existing rooftop solar. This should be the highest priority.

4. While the DRECP's focus on the end goal (production of renewable energy of X amount by a certain date), the resulting consequence is that the DRECP is automatically in "fast-tract mode" seeking "the timely permitting of compatible energy projects."

5. So it comes as no surprise that the agencies' purposes and needs and objectives focus on rapidly expanding large-scale energy developments. Some solar companies are beginning to see the failures and the resulting negative effects on the desert vegetation and wildlife and the desert communities. These effects also include human health risks (such as silicosis) and poor air quality in general. Our desert communities are economically dependent on tourism; an industrialized desert will have a negative economic effect on tourism as well as on individual property values.

6. Much time and effort has gone into the DRECP, yet its focus must change. To conserve the California desert effectively, focus must shift to the point-of-use solar alternative (developed by the California Public Utilities Commission and the California Energy Strategy (CEESP) to efficiently address the climate crisis as well as the State's mandate. The change must come now.

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Response to Comment Letter F182

Almut Fleck
February 23, 2015

F182-1 Thank you for your comment. While it has not resulted in a change in the document, the BLM has taken it into consideration.

F182-2 No change in the document is required as a result of this comment. Distributed generation was considered but not carried forward as discussed in Volume II, Section II.8.2.

F182-3 While this comment has not resulted in a change in the document, the BLM has taken it into consideration. It is beyond the scope of the BLM LUPA and Final EIS.

F182-4 While this comment has not resulted in a change in the document, the BLM has taken it into consideration. 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 BLM LUPA and Final EIS for BLM-administered lands. The DRECP process would streamline permitting within designated DFAs but site specific analysis of potential impacts would continue to be required under NEPA.


F182-6 See response F182-2.
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