DRECP COMMENTS

Nov. 19, 2014

The mindset "good-enough-for-government-work" must be abolished in this document by using language embracing adaptive management. Incentivize large utility-scale technology to do more with less. The rapidly expanding horizons of solar technology just in the last 5 years are mind-blowing. Look around and see the leading edge of science; foster use of these technologies. Demand transparency in numbers and the moneymakers.

Speaking of transparency in numbers, from where do you derive 20,000 MW target amount? Demographic studies can be in depth and quite precise. Where are those studies?

Also completely transparent must be the funding forthcoming to monitor and adhere to monitoring standards in perpetuity. The immensity of this task and all the work going into it will be without value if not monitored for compliance.

All existing DFA's must be refined in favor of critical habitats and cultural resources. Any suggestion that the number of DFA's need be increased per alternative/non-preferred plans is a non-starter. Utility scale development in the Desert Tortoise Research Natural Area, for example, is preposterous. No amount of mitigation can rectify blading the desert in one of the only places where the tortoise population is actually increasing.

Additionally, development in critical resource areas of Soda Mountain and Silurian Valley is so ill advised that to do so would undermine the credibility of this process. This, in turn would assure all of us who are watching, that the political course of action merits more importance than scientific inquiry.

Finally, the target amount of renewable energy can be met using 50% distributed sources with merely a shift in outlook. Solar on existing roofs where the electricity is actually used makes sense on so many levels, with no disrespect meant to large scale developers.

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Response to Comment Letter F33

Karen Tracy
November 19, 2014

F33-1 Thank you for your comment. The Bureau of Land Management (BLM) recognizes that technology evolves and has provided for adaptive management. See, for example, Volume I, Chapter I.3, describing the planning process, including use of adaptive management. The use of 20,000 megawatts (MW) for planning purposes in the Desert Renewable Energy Conservation Plan (DRECP) also is described in Chapter I.3.

F33-2 The BLM has taken your comment into consideration in developing the BLM 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 LUPA and Final EIS that addresses activities on BLM-administered lands only. See also Section II.3.6 for a description of the monitoring and adaptive management program for the BLM LUPA.

F33-3 The Desert Tortoise Research Natural Area is no longer included in the Development Focus Area (DFA) in the preferred alternative.

F33-4 The Soda Mountain and Silurian Valley areas are not within DFAs under the LUPA.

F33-5 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.