11/25/2014 submitted via email: docket@energy.ca.gov

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Commissioner  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Chariton H. Bonham  
Director  
California Department of Fish and Game  
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James G. Kenna  
State Director, California State Office  
Bureau of Land Management  
2800 Cottage Way  
Sacramento, CA 95825

Ren Lohofener  
Regional Director, Region 8  
U.S. Fish and Wildlife Service  
2800 Cottage Way  
Sacramento, CA 95825

Re: Renewable Energy Conservation Plan and Draft Statement/Environmental Impact Report, California,

Dear Commissioner Douglas, Director Bonham, Director Kenna, and Director Lohofener:

The current DRECP draft alternatives all represent out dated, 6 year old thinking and technology. The renewable energy industry leaders are headed away from utility scale RE on large undisturbed tracks of land. To illustrate, below is a quote from NRG Energy’s CEO, David Crane in his letter to his shareholders in March of 2014. (NRG Energy is a significant partner in the huge Ivanpah Solar Electric Generating System.)

Quote:

"Just a few years ago the prevailing wisdom was that the path to a clean energy economy depended on our collective willingness to build a nationwide, high voltage transmission system in order to transport electricity in vast quantities from the relentlessly windy and brutally sunny parts of the country, where people generally don’t live, to the more moderate places where Americans tend to congregate. The folly of that idea thankfully was realized before anyone actually began to build such an expensive and pointless white elephant. Now we are headed for the same goal BUT in the opposite direction down the path towards a distributed generation-centric, clean energy future featuring individual choice and the empowerment of the American energy consumer."

End of Quote

In light of technology advances and new industry thinking the following issues should be considered in the final DRECP:

1) The discarded DRECP Distributed Generation Alternative should be revisited and elements of it should be brought forward into the current preferred alternative to shrink DFAs.

2) Areas of disturbed lands all over the State close to existing transmission and substations should be identified to expand the geographical opportunities for utility scale RE that will contribute to the DRECP’s total mega-watt computations.

3) DFAs should be re-defined to avoid critical wildlife linkages and ecological issues that have been identified by other commenters.

I respectfully submit these comments.

Ruth Riemann
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Response to Comment Letter F37

Ruth Rieman
November 25, 2014

F37-1 Thank you for your comment. The Bureau of Land Management (BLM) has taken it into consideration in developing the BLM 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 LUPA and Final EIS that addresses activities on BLM-administered lands only. See also Volume II, which includes revised descriptions and mapping for the range of alternatives considered for the BLM LUPA, including substantial reductions in Development Focus Areas (DFAs) as compared to that proposed for the Plan-wide Draft DRECP alternatives. 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 setting with both electrical demand and areas or surfaces available for installation of distributed generation technology.