From Fred Emery, former executive editor, The Times of London, now winter resident of Borrego Springs.

While I appreciate that you have extended the comment period by 6 weeks, I still think this is too short a period for a proper consideration of such a long public document. I would respectfully plead that the period be further extended, and that a further series of public hearings should include one in Borrego Springs itself.

I have been fortunate enough to winter here for 10 years. During that time the community here managed to see off the ill-considered Sunrise Power Link plan, insofar as it concerned the De Anza Borrego Desert State Park.

At that time, I made serious representations to the state authorities that this park be seen not just as a Californian, nor indeed an American concern, but as a world resource. That issue now becomes even more pressing when active consideration is being given to elevating the park to the envied status of a UN World Heritage site.

Erecting utility-size solar facilities within the park, either on private inholdings or federal/BLM lands, and then adding high power lines to carry the electricity away, would indisputably damage the unique desert environment of the park and should not be contemplated.

Even any new power lines from facilities outside the park scheduled to transit protected areas should only be contemplated under ground, whatever the increase in cost.

Finally, I support the many others who complain that the DRECP consigned the possibility of mass rooftop solar to “alternatives considered but not carried forward for detailed analysis”. At a time when surprise developments can happen, like the current fall in oil prices, it is my contention that every alternative to massive destruction of the desert environment should be rigorously analysed.
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Response to Comment Letter F55

Fred Emery  
December 30, 2014

F55-1 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. The Draft Desert Renewable Energy Conservation Plan (DRECP) Environmental Impact Report/Environmental Impact Statement (EIR/EIS) had a 5-month comment period (9/23/14 through 2/23/15), which included one extension.

F55-2 This comment has not resulted in a change in the document, but the BLM has taken it into consideration. No facilities are proposed to be constructed in Anza-Borrego Desert State Park under the DRECP.

F55-3 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.