Contact Person: Elizabeth Perluss  
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TO: California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: DRECP NEPA/CEQA

To Whom It May Concern:

I have been a resident of California all my life. As I child, my parents frequently took me to the desert regions of California, including the Mojave Desert, Death Valley, and the Owens Valley. As an adult, I now work and spend considerable amount of time in the Owens Valley. It is a place that I have deeply come to love for its pristine magnificence. With this, I am concerned about all of our deserts, particularly within Inyo County, being developed with large-scale renewable energy projects. I have concerns that urban areas and rooftop solar alternatives have not been fully explored, especially after a recent study conducted by the Luskin Center at UCLA demonstrates that rooftops in Los Angeles alone could generate up to 19,000 Megawatts of Solar Power.

Nevertheless, given the rush of applications by renewable energy companies to develop more of our desert land, I do believe that a DRECP is necessary. I appreciate that the Bureau of Land Management, along with the CEC and other agencies, has issued the Desert Renewable Energy Conservation Plan, to attempt to identify areas where energy development in our deserts may be less harmful to plants, wildlife, scenery, recreation and other values, while also identifying places that should not be developed. In considering modifications to the current DRECP draft, I ask that you give further thought to some of the special places in Inyo County that, in my estimation, should NOT be considered as locations for renewable energy development. I ask the BLM to improve the Preferred Alternative of the DRECP by including the following places, in their entirety, in both Areas of Critical Environmental Concern and National Conservation Lands:

- California Valley
- Coso Range area
- Knight Canyon (Panamint Valley)
- Lower Centennial Flat
- Malpais Mesa area (including Talc City Hills, Santa Rosa Flat, and Conglomerate Mesa)
- Rose Valley/McCloud Flat
- Osborn Canyon (Panamint Valley)
- Snow Canyon (Panamint Valley)
- Sperry Hills/Kingston Range
- Wildrose Wash (Panamint Valley)

I also ask the BLM to make the following changes to the Preferred Alternative:

- Recommend to Congress that it make National Conservation Lands off limits to new mining and mineral leases, with the exception of small-scale rockhounding activities;
- Designate National Conservation Lands as either Visual Resource Management Class I or II, so that approved activities will only cause limited changes to landscape character;
- Retain Areas of Critical Environmental Concern within National Conservation Lands (instead of removing that special management designation), so that there will be an added layer of protection for more specific values within these areas.

Thank you,

Elizabeth Perluss  
Auburn, CA
Response to Comment Letter F88

Elizabeth Perluss
February 17, 2015

F88-1 Thank you for your comment. Rooftop distributed generation is included in the California Energy Commission’s renewable energy calculator for the Desert Renewable Energy Conservation Plan (DRECP). The distributed generation alternative does not meet the Bureau of Land Management’s (BLM’s) purpose and need. Distributed generation was considered but not carried forward, as discussed in Volume II, Section II.8.2.1.

F88-2 This portion of the comment is substantially similar to comment letter G8. Please see the responses to letter G8 for further information.

F88-3 See Appendix Z of the DRECP Proposed Land Use Plan Amendment (LUPA) and Final Environmental Impact Statement (EIS). The BLM is proposing a phased approach to withdrawing lands from mineral entry.

F88-4 See Figure II.3-5 for VRM classes. Many National Conservation Lands have been designated VRM Class II.

F88-5 See Appendix L for individual management prescriptions for National Conservation Lands.
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