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Sent: Sunday, February 17, 2013 4:05 PM

To: Harlow, David@Energy; cbeale@resourceslawgroup.com; Flint, Scott@Energy; wcondon@dfg.ca.gov; Ken_Corey@fws.gov; vlcampbell@blm.gov

Subject: DRECP Comments

To Whom it May Concern,

For what it is worth, we would like to submit these general comments on the Desert Renewable Energy Conservation Plan. We attempted to submit comments on your electronic form. It is not functional from your web site, for us at least.

1. The DRECP should be following the advice of the Independent Science Advisors, not that of the political interests motivated by the wind and solar energy developers. This is a conservation plan and it should not cave into special corporate interests from the solar and wind industry.
2. The DRECP should have an alternative that only examines distributed generation and renewable energy confined to the built environment. This alternative should examine feed in tariffs, EPA identified brownfields and recent success of Germany getting 22 GW of renewable energy on line, 80 percent of which is located on rooftops. Under the National Environmental Policy Act, federal agencies are required to examine all alternatives outside of the jurisdiction of the lead agency.
3. The most environmentally friendly alternative you have presented is Alternative 1. Even under this alternative, DRECP identifies large developments in areas where cumulative impacts will be impossible to mitigate. One good example of this is that Alternative 1 identifies 6,000 acres of lands that would be appropriate for development in the Silurian Valley. Any energy in that area will degrade its rural, backcountry character forever. This is not sustainable public lands management.
4. The DRECP has been set up to approve big energy in California even with a No Action Alternative. By failing to examine all reasonable alternatives, DRECP ends up giving substantial portions of land away even under a No Action Alternative.
5. The worst part about the DRECP is that it is reminiscent of the problems that have been created by the Solar Programmatic Environmental Impact Statement. You are asking all of us to identify the lands of value in the California Desert and only giving us a limited time to do so. While we are very familiar with the geography and natural history of the California Desert, we can not possibly have a good handle on all of the locations and resources that will be forever damaged and degraded by poorly planned energy sprawl. We were just recently made aware of an area off the radar of the DRECP that has very important paleontological resources. But the federal agencies have created such a big distrust between conservation management and public land sacrifice for green energy sprawl, that we are very weary to bring this to your attention under the DRECP. The worst

case scenario for us is that we will give you our list of areas that we believe should be protected, and we would see a Record of Decision that writes off other important areas that the DRECP review process has missed. And let's face it, you are dealing with a very large amount of acreage here. There is just no way that a review process like this will cover it all in the short period of time that you have set goals for. We would like to say for example, that no solar energy sprawl should be allowed on the Palo Verde Mesa near Blythe, but even our most detailed letter would probably miss some special area in the Owens Valley or Tecopa. We definitely do not want our comments about protecting one region used as a justification to develop another. That is setting us as public citizens up to be involved in poor planning of desert resources.

6. The DRECP Plan will need several more years of evaluation before it could even be finalized. Public and agency review should remain very critical of any proposed utility scale energy project on an individual basis. A region should not simply be written off because the DRECP says its OK. Full NEPA and CEQA review needs to go to each individual project. The DRECP can not and should not create short-cuts to environmental review for any large scale energy project no matter where it is located.

Sincerely,

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