

# California Desert Renewable Energy Working Group

October 16, 2014

Karen Douglas  
Commissioner  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Charlton H. Bonham  
Director  
California Department of Fish and Game  
1416 Ninth Street  
Sacramento, CA 95814

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: Request for extension of time for public comment period for the Draft Desert Renewable Energy Conservation Plan and Draft Environmental Impact Statement/Environmental Impact Report, California, 79 Fed. Reg. 57971 (September 26, 2014)**

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

On behalf of the undersigned organizations and companies, members of the California Desert Renewable Energy Working Group, we respectfully request a 60-day extension of the comment period for the Draft Desert Renewable Energy Conservation Plan (DRECP) and Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR), California, 79 Fed. Reg. 57971 (September 26, 2014) so that we may develop meaningful and constructive joint comments. We also request that the draft Implementation Agreement be released for public review during this comment period for at least 60 days before the end of the comment period for the DRECP Draft EIS/EIR.

The California Desert Renewable Energy Working Group, a dialogue between representatives of the renewable energy industry, the electric utility sector, and the environmental community, seeks to protect ecosystems, landscapes, and species while supporting the timely development of appropriately sited renewable energy resources on public and private lands in the California desert. Our aim is to protect ecosystems, landscapes, and species while supporting the critical, timely and appropriate development of renewable energy resources in the California desert.

On September 26, 2014, the California Energy Commission, California Department of Fish and Wildlife, the Bureau of Land Management, and U.S. Fish and Wildlife Service (agencies) announced the availability of the Draft DRECP and accompanying documents. The DRECP covers 22.5 million acres of public and private land in the desert regions and adjacent lands of seven California counties - Imperial, Inyo, Kern, Los Angeles, Riverside, San Bernardino and

San Diego. The Draft DRECP and associated documents total more than 8,000 pages of detailed information and analysis.

We appreciate that the agencies have provided a 90 day public comment period. However, we have identified a number of critical and complex issues which will require more time for sufficient analysis, including, but not limited to:

- Biological Goals and Objectives and associated Conservation Management Actions
- Legal and governing structure of the plan
- Transmission
- Funding for plan implementation
- Development pathways and permitting
- Energy projections
- General Conservation Permit/Endangered Species Act Standards
- Special Study Areas and Future Study Areas
- Multi-technology DFAs

We would also like to re-iterate our strong interest in additional webinars presented by the DRECP agencies on the topics of: transmission, funding, development pathways, and conservation designations and management. These webinars will be extremely helpful in our comment development.

Granting our 60-day extension request will allow our organizations and companies, as well as all interested stakeholders, a more sensible time frame to develop useful and substantive comments for the agencies to consider.

In addition the agencies have yet to release the draft Implementation Agreement for the DRECP, which should also be subject to public review and comment at the same time as the Draft DRECP and Draft EIR/EIS in order to allow for the public to develop informed comments on the potential impacts of the proposed plan. Cal.Fish and Game Code 2815. The Implementation Agreement sets forth the legal structure and obligations of the implementing agencies under the plan and is a critical component to understanding how the plan will be carried out.

For these reasons, we request that the comment period on the draft DRECP and EIS/EIR be extended for 60 additional days and that the draft Implementation Agreement be released for public review during this comment period for at least 60 days before the end of the comment period.

We appreciate the agencies' serious consideration of our requests and look forward to your response.

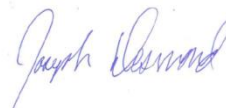
Respectfully submitted,



Frederick Redell  
Abengoa Solar, Inc.



Garry George  
Audubon California



Joseph Desmond  
BrightSource Energy



Kim Delfino  
Defenders of Wildlife



Mark Tholke  
EDF Renewables



Jesse Gronner  
Iberdrola Renewables



Shannon Eddy  
Large-Scale Solar Association



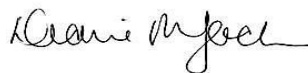
Laura Crane  
The Nature Conservancy



Helen O'Shea  
NRDC



Diane Fellman  
NRG Solar LLC



Diane Ross-Leech  
Pacific Gas & Electric



Barbara Boyle  
Sierra Club



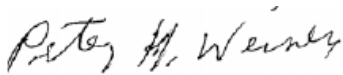
Thomas J. Starrs  
SunPower Corporation



Pamela Pride Eaton  
The Wilderness Society



V. John White  
CEERT



Peter Weiner  
Paul Hastings

CC: Terry Watt