

October 10, 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, we respectfully request a 30-day extension of the comment period for the Draft Desert Renewable Energy Conservation Plan (DRECP) and Draft Environmental Impact Statement/Environmental Impact Report (Draft EIR/EIS), California, 79 Fed. Reg. 57971 (September 26, 2014). We also request that the draft Implementation Agreement is released for public review during this comment period for at least 60 days before the end of the comment period.

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 do not believe that given the volume and complexity of the Draft DRECP and various environmental documents a 90 day public comment period is sufficient time to review this information and provide detailed and meaningful public comment. Granting our 30-day extension request will allow our organizations, 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 still need 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.

For these reasons, we request that comment period be extended for 30 additional days and that the draft Implementation Agreement is 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,

Jordan Kelly  
**Amargosa Conservancy**

Garry George  
**Audubon California**

Greg Suba  
**California Native Plant Society**

Ryan Henson  
**CalWild**

Ileene Anderson  
**Center for Biological Diversity**

Sam Goldman  
**Conservation Lands Foundation**

Kim Delfino  
**Defenders of Wildlife**

Danielle Segura  
**Mojave Desert Land Trust**

Dennis Schramm  
**Mojave National Preserve Conservancy**

David Lamfrom  
**National Parks Conservation Association**

Helen O'Shea  
**Natural Resources Defense Council**

Laura Crane  
**The Nature Conservancy**

Drew Feldmann  
**San Bernardino Valley Audubon Society**

Barbara Boyle  
**Sierra Club**

Sally Miller  
**The Wilderness Society**

April Sall  
**The Wildlands Conservancy**