



IBERDROLA RENEWABLES

California Energy Commission

DOCKETED

09-RENEW EO-1

TN 74771

FEB 23 2015

California Energy Commission

Attn: Scott Flint, DRECP Program Manager

February 23, 2015

Dockets Office, MS-4

Docket No. 09-RENEW EO-01

1516 Ninth Street

Sacramento, CA 95814-5512

docket@energy.ca.gov

RE: Iberdrola Renewables Comments on Draft DRECP and EIR/EIS

Dear Mr. Flint:

Iberdrola Renewables, LLC (IRL) is the second largest provider of clean energy in the country, with more than 5,800 megawatts of wind and solar power in the United States. IRL is at the forefront of the wind industry on environmental stewardship and will carry that same approach into our growing solar portfolio. In 2008, we established a company-wide Wildlife Protection Program and are the only renewable energy company to join the Avian Power Line Interaction Committee. IRL is a founding participant of the American Wind and Wildlife Institute and our renewable energy projects have been host to numerous research studies that have advanced scientific knowledge of avian, bat and other wildlife populations and behaviors. IRL has been actively engaged in the California Desert Renewable Energy Working Group (CDREWG) and has participated as a vocal party representing wind and solar development interests as the Desert Renewable Energy Conservation Plan (DRECP) has evolved over the past several years. In addition to any statements provided as a member of the CDREWG, Iberdrola Renewables submits these additional comments on the DRECP and associated Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR).

The Draft DRECP is an extremely difficult document to analyze, understand, and ultimately fully evaluate. However, based on our understanding, the Draft DRECP as written provides questionable tangible benefit to renewable energy development and instead introduces significant uncertainty into the already-challenging development process. The Draft DRECP is inconsistent with the Wind Energy Guidelines (WEG) risk-based, tiered development approach favored by the U.S. Fish and Wildlife Service and limits development to unsubstantiated and overly-restrictive go/no-go areas in lieu of a more appropriate criteria-based methodology. Additionally, the Draft DRECP's newly created streamlined permit process does not yield any substantial benefit to the existing permitting processes but it does create a great deal of ambiguity as it relates to time-tested NEPA and CEQA requirements – thus exposing the implementing agencies as well as renewable energy developers to legal challenge.

If the Draft DRECP is approved in its current form it will hinder California's push toward a clean energy future and undermine U.S. Department of Interior and Bureau of Land Management efforts to help promote and expedite prudent renewable energy development on Federal lands. Absent a significant change to the approach being taken in the Draft DRECP,

Iberdrola Renewables believes the no action alternative (i.e. "status quo") provides a more consistent and understood set of requirements, greater flexibility to include on-the-ground data and/or changes to technology over time, and fewer uncertainties than those demonstrated in the Draft DRECP. A supplemental or revised EIS/EIR is needed to address these substantive flaws in the Plan. As a participant in the process from the inception of the plan, we remain willing to actively participate in the modification of the Draft DRECP into a plan that could be more widely supported by multiple parties and which adequately addresses these renewable energy development concerns shared by us and other stakeholders.

Sincerely,

A handwritten signature in black ink, appearing to read "Jesse Gronner", written in a cursive style.

Jesse Gronner
Managing Director, Business Development