

October 3, 2014

Via E-mail docket@energy.ca.gov and First-Class Mail

California Energy Commission
Dockets Office, MS 4
Docket No. 09-RENEW EO-01
1516 Ninth St.
Sacramento, CA 95184-5512

Re: Draft DRECP document and related Environmental Impact Report/Statement

Dear Sir or Madam:

The Alliance for Desert Preservation is a nonprofit mutual-benefit corporation formed to protect the environmental and economic well-being of the High Mojave Desert and to support a sustainable future, while safeguarding against activities that may harm the High Mojave Desert.

We write to request that the public comment period on the draft DRECP document and related EIR/EIS be extended from 90 days to at least 180 days from the date of issuance.

Several reasons mandate that the comment period be extended.

First, the draft document is more than 8,000 pages long, and the public comment meetings are set to begin fewer than 30 days after release. Simply to finish reading the document by the time of the first public comment meeting would require that we read and comprehend at the rate of several hundred pages per day. This is simply not possible.

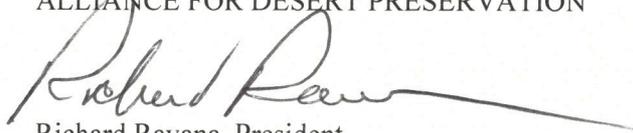
Second, the DRECP document reports a vast amount of data on Data Basin. Data Basin is a difficult program in which to navigate. Precious days and weeks will be taken up merely in learning to use and manipulate the software.

Third, the DRECP has been more than five years in preparation. This extended gestation period is reflected in a very prolix DRECP document. To limit public comment to about 100 days makes a statement that public input is not wanted. This is not the kind of statement that the REAT agencies should want to be making.

Fourth, the DRECP document promotes a master plan that will enable the construction and operation of utility-scale energy projects generating a total of 20,000 megawatts in the California desert. There is much data now to suggest that this policy choice is based on obsolete and incorrect assumptions, and is simply wrong. The result will be enormous damage inflicted on a precious, unique biome, which Congress has termed “fragile, easily scarred, and slow to heal.” To allot a mere 100 days for public input regarding a document promoting such drastic consequences is unseemly. It also removes any patina of legitimacy to the planning process, and it calls the DRECP into serious question from both a political and legal standpoint.

Please give the ordinary citizens of the United States and the State of California ample time to critique the draft DRECP and ancillary EIR/EIR. A minimum time frame for comment is 180 days.

Very truly yours,
ALLIANCE FOR DESERT PRESERVATION



Richard Ravana, President

cc:

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