

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,

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Amargosa Conservancy

Garry George
Audubon California

Greg Suba
California Native Plant Society

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CalWild

Ileene Anderson
Center for Biological Diversity

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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