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Via Electronic Mail (hard copy to follow)

Kevin Hunting
Chief Deputy Director
California Department of Fish and Game
1416 Ninth Street, Suite 1208
Sacramento, CA 95814

Re: Comment on the Draft Interim Mitigation Strategy As Required by SB X8 34 (July 2010) (DRECP-1000-2010-006)

Dear Mr. Hunting:

On behalf of the undersigned conservation organizations, we would like to thank you for the opportunity to review and provide comments on the Draft Interim Mitigation Strategy (Draft IMS). We believe that this document is critically important to ensuring that "fast-tracked" projects permitted will have mitigation implemented in a manner that ensures the unavoidable impacts of these projects have been adequately mitigated in compliance the state and federal endangered species acts. We also believe that this strategy, if done correctly, should serve as a starting point for the developing conservation strategy in the Desert Renewable Energy Conservation Plan (DRECP).

To that end, SB X8 34 set forth specific requirements for the IMS:

- The IMS must include a "description of specific mitigation areas and specific actions on public or private land within the Desert Renewable Energy Conservation Plan planning area that are to be implemented, including a focus on habitat preservation, while also including enhancement or restoration actions. Fish and Game Code Section 2069(c)(2).

- The IMS must show that the mitigation actions chosen will "[c]ontribute to the conservation of each candidate species, threatened species, or endangered species for which a permit issued." Id.

- The IMS must be a regional planning document that "provides a foundation for, or that will complement, any conservation strategy to be developed for the Desert Renewable Energy Conservation Plan." Id.

- The IMS must show how it will result in the implementation of "mitigation actions within a reasonable period of time relative to the impact to the affected candidate species, threatened species, or endangered species, including, where feasible, advance mitigation.

For purposes of this clause, `advance mitigation' means mitigation implemented before, and in anticipation of, future impacts to natural resources." Id.

- The IMS must "[i]nclude a description of the species that would be benefited by each mitigation action and how it would be benefited. Id.

- The IMS must include a "cost estimate for each action, whether on public or private land, using total cost accounting, including, as applicable, land acquisition costs, conservation easement costs, monitoring costs, transaction costs, restoration costs, the amount of a nonwasting endowment account for land management or easement stewardship costs by the department or other management entity, and administrative costs." Id.

- "The interim mitigation strategy shall be based on best available science and shall be reviewed by the Desert Renewable Energy Conservation Plan independent science advisors. The department shall seek and consider comments from the Desert Renewable Energy Conservation Plan independent science advisors in the design and location of each mitigation action implemented pursuant to this section. If the department elects to not incorporate comments of the independent science advisors into mitigation actions, the department shall explain the reasons for that decision in writing." Fish and Game Code Section 2069(d).

Overall, we strongly support the IMS's focus on ecosystem connectivity and regional planning, and its innovative structure, which is intended to provide for advance mitigation, with sufficient resources targeted at conservation priorities.

With key modifications and additional detail, the final IMS should lay a sound foundation for the construction of important sections of the DRECP, and provide excellent precedent for accomplishing desert conservation on a regional scale.

1. <u>The IMS Needs An Overall Comprehensive Framework.</u>

As an initial observation, the IMS is missing an overall framework of how temporary and permanent impacts requiring compensatory mitigation covered by the IMS will be established, how mitigation for these impacts will be evaluated against and integrated with other required mitigation—especially avoidance and minimization requirements, how state and federal mitigation requirements will fit together, how cumulative impacts and ratios will be handled, and details about how priorities among compensatory mitigation options are set. We recognize that the statute narrowly focuses on compensatory mitigation for state listed and candidate species, but without discussing how the IMS will address overall mitigation issues, the document lacks valuable context. We do not believe that the IMS should be regarded only as a means of implementing the SB34 requirements. Given its likely role as precedent for mitigation programs that will follow, the IMS should cover more comprehensively the topics to which it is inseparably related so that mitigation requirements for desert renewables projects can be completely understood.

2. **<u>The IMS Needs to Follow the Mitigation Protocol/Hierarchy</u>**.

Following on the previous comment, the IMS lacks a discussion of how the IMS compensatory mitigation requirements will be integrated with earlier evaluative steps in the mitigation protocol. The mitigation protocol (also known as the mitigation hierarchy) is the approach to the foreseeable impacts of projects that requires first making every effort to avoid damages to environmental resources, then minimizing that damage that cannot be avoided, and only then offsetting the damage that cannot be avoided or minimized. Thus, access to compensatory mitigation must be predicated on the absence of actions that will avoid, then minimize and/or restore harm. Reading the IMS, it would appear that compensatory mitigation might be made available to fast track projects—through payment of a fee—without the initial careful evaluation and required first steps in the protocol.

The absence of discussion of the mitigation protocol is particularly important since the IMS seems to lump together compensatory mitigation actions with avoidance and minimization requirements that would be required to be taken on site by project applicants (see, especially, pages 14-15). Activities listed under "Habitat Enhancement" and "Restoration" are termed project-specific, and are quite obviously steps that would be required to be taken to minimize harm by project developers on site. The IMS should highlight the role of the mitigation protocol, underscore the preeminence of the avoidance and minimization steps, establish a clear preference for land acquisition among compensatory mitigation actions, and make clear that payment for avoidance, minimization, and on-site restoration does not constitute compensatory mitigation, and will not satisfy that mitigation obligation.

Several of the listed habitat enhancement and restoration actions are clearly inappropriate for consideration as compensatory mitigation. For example, all of the activities listed under "Habitat Enhancements" on pages 14-15, with the possible exception of d, g, and h, would appear to apply specifically to minimization and best management practices at development project sites, and thus should not qualify as compensatory mitigation. Indeed, the majority of the identified habitat enhancements such as minimization of vegetation removal and salvage of Joshua Trees and succulents should not be considered habitat enhancement for mitigation purposes. These are simply best management practices that should be applied to projects within the project development area.

In the "Restoration" list, again, these actions seem mostly to refer to things a project developer would be required to do to minimize and restore damage to a project site, and not to describe compensatory mitigation.

The IMS would be greatly improved by describing actions in greater detail that would usually qualify as compensatory mitigation, particularly on public lands, making clear that these actions do not qualify for compensatory mitigation at project sites, and then setting forth the method for determining how priorities among options will be established. We discuss these issues further below.

3. The Differences in Mitigation Requirements Must be Resolved.

The IMS does not discuss clearly, as it should, how the fact that its provisions deal solely with compensatory mitigation for California Endangered Species Act (CESA) requirements for take of state listed and candidate species will interact with mitigation for other species, other forms of harm, and federal mitigation requirements. The IMS does note that mitigation for all other federal and state species, and other adverse effects (e.g. air and water quality) will still be required. However, the IMS somewhat confusingly notes that different Renewable Energy Action Team (REAT) agencies have differing statutory and regulatory requirements, and the approach to mitigation in the IMS must be flexible enough to accommodate differences while meeting the legal requirements of CESA, the federal Endangered Species Act (ESA) and other statutes. While this statement implicitly recognizes the fact that there are multiple, sometimes overlapping or conflicting, state and federal mitigation requirements, it fails to go further and discuss how they will be integrated and differences resolved. In particular, the IMS should discuss how the long-standing variance between federal and state approaches to endangered species mitigation will be accommodated in implementing the IMS program.

4. The Mitigation Areas and Mitigation Actions in the IMS Fail to Meet Minimum Statutory Standards.

Pursuant to SB X8 34, the IMS must describe with specificity the mitigation areas and actions on public or private land within the Desert Renewable Energy Conservation Plan planning area that are to be implemented, including a focus on habitat preservation, while also including enhancement or restoration actions.

Unfortunately, the IMS fails to include much specificity with respect to the mitigation areas and actions.

A. The DRECP Starting Point Map Needs Additional Refinement.

The data sources used in developing the starting point map should include additional areas of higher value for biological resources, specifically Bureau of Land Management (BLM) designations in the California Desert Conservation Area (CDCA) Plan for Wildlife Habitat Management Areas established in the 1980 plan (as amended) including amendments contained in the Western Mojave Plan (WEMO), the Northeastern Colorado Plan (NECO) and Northeastern Mojave Plan (NEMO) regional amendments. BLM designated Key Raptor Areas and Unusual Plant Assemblages should also be included in conservation areas. In addition, the approximately 100,000 acres of lands acquired by the U.S. Army as part of the mitigation for impacts resulting from the expansion of Fort Irwin should be included in the conservation areas.

Habitat sensitivity rankings should not be limited to species having a majority of their known ranges within the planning area.

The Conservation Opportunity Areas should not be limited to habitats for listed species, although these should be given a higher priority. Fully functioning ecosystems for naturally occurring species should also be included. The conservation areas should not be limited primarily to

Desert Wildlife Management Areas (DWMAs) managed by BLM (which, in most cases, were designated as Areas of Critical Environmental Concern (ACECs) for Desert Tortoise conservation through CDCA Plan amendments).

Finally, we continue to urge that the Iron Mountain study area should be removed from the plan as a viable Renewable Energy Study Area because it is an area of high value for habitat connectivity and wildlife movements, especially for the Desert Tortoise and Desert Bighorn. Areas of uncertain value that require additional study to determine their biological value should be excluded until such a time as the necessary study has been completed and sound decisions about their values can be made.

B. The Primary Conceptual Conservation Acquisition Areas Contain Errors, Lack Detail and Miss the Opportunity to Build the Framework of a Conservation Reserve Design.

The four clusters of areas targeted by the IMS for initial acquisition do not all satisfy the criteria for an optimal reserve design and cannot form a foundation for building investment in areas that will continue to serve as part of the conservation core. Specifically:

- Northwestern San Bernardino County. Habitat acquisition and protection should specifically include establishing a substantial habitat zone connecting the Desert Tortoise Natural Area and the Fremont Valley with lands to the east across Highway 395, including lands that are within the northern reaches of the California City boundary. Acquisition should also include lands to the north and south across Highway 395 so that connectivity with the El Paso Mountains, southern Indian Wells Valley and habitat on the west side of Hwy. 395 is maintained and enhanced. Connectivity habitats should be protected and enhanced through reduction of off-road vehicle use, route closures, highway undercrossings and closure to multiple use activities that would destroy habitat for the Desert Tortoise and Mohave Ground Squirrel.

- The East Riverside County area significantly overlaps with the Eastern Riverside Solar Energy Study Area that the Bureau of Land Management is studying under its Solar Energy Development Programmatic Environmental Impact Statement. While there may be some land of conservation value in this area, and while some corridors may be important to protect within a potential development zone, it is not feasible to establish a portion of a conservation core reserve within an area identified for intense development. In addition, the Mohave ground squirrel does not occur in this area.

- The Eastern San Bernardino County adjacent to the CA-NV state line and within Mojave National Preserve. The acquisition target map appears to be limited to the “keyhole” in the Mojave National Preserve in the Castle Peaks area. The Castle Mountain area in the eastern Mojave, while having conservation value, is very likely inappropriate for mitigation of listed or candidate species. The desert tortoise habitat is marginal due to the elevation and it is outside the range of the Mohave ground squirrel habitat. The acquisition area needs to be expanded to include critical habitat for the Desert Tortoise in

Piute Valley and in Ivanpah Valley near Nipton. Priority should be given to acquisition of private lands in proximity to public lands containing high value biological resources.

- Central San Bernardino County, southeast of Barstow and south of I-40 does not have Mohave ground squirrel nor is the squirrel known to range in this area.

- The area identified in the vicinity of the Ord and Rodman Mountains includes land proposed for withdrawal for the expansion of the Twentynine Palms Marine Base, as well as land located within the Johnson Valley Off Highway Vehicle (OHV) Open Area. Given these other conflicting uses, we do not believe that these lands are located in an appropriate site for mitigation, nor do we believe that these lands could help form the foundation of a conservation reserve for the DRECP.

The initial target areas for acquisition should be altered to focus on areas that are excellent quality habitat for listed species, provide connectivity to other habitat, and represent a good start on fulfilling the goals of a regional plan. Proximity to existing solar development sites should be a secondary selection criterion. Other areas, some more distant from project sites but important in a regional or connectivity context, may be better acquisition target areas. As one example, in the eastern Mojave, Chicago Valley and the Charleston View area contain significant privately owned acreages of good quality tortoise habitat that link to large protected areas.

More importantly, the IMS could be significantly improved by presenting a methodology for selecting acquisition target areas, allowing for specific selection to be made as part of a separate process that would provide the opportunity for a more considered identification of acquisition sites that optimize regional conservation, perhaps after consideration of whether willing sellers exist.

The IMS would be also improved by a more specific discussion of how the acquisition process will work—for example, who will be in charge, how negotiations will be handled, how will decisions on purchases be made, and how the NGO role in acquisitions will be administered. Acquisition costs and targeting are handled somewhat casually. For example, on page 22 (at item number 3), the IMS states that about half of 43,500 acres identified for acquisition by DFG could be acquired for the $10 million revolving fund. The basis for this calculation is not explained -- are these specific acres, and how was the attributed cost of about $500/acre derived?

C. The Mitigation Actions of Habitat Protection, Restoration and Enhancement Actions Need Better Definition and Must Avoid Using Actions Not Considered to Be Appropriate Mitigation.

Habitat protection, restoration and enhancement actions (IMS, pages 18-20) will qualify as compensatory mitigation, on public, and presumably on acquired private lands as well. Preference is accorded to actions aimed at the recovery of listed species, and to actions within the mitigation acquisition target areas and in critical habitat. Apart from a brief discussion and a simple chart outlining possible restoration/enhancement actions of various listed species, however, the IMS provides little hint about how decisions to select and approve these actions will be made, the relative priority that will be given to acquisition compared to protection and

restoration, how the success of these projects will be judged and monitored, who will be responsible for carrying out the activities, and where these action should occur in specific areas.

In addition, the IMS does not discuss the protection of desert groundwater and surface water resources as key compensatory mitigation measures, which we believe should be separately addressed and highlighted. Further, there is little recognition of the need to consider the likely effects of future climate change in selecting lands or undertaking other actions qualifying as compensatory mitigation measures. Finally, we do not support basing what would be appropriate recovery actions for Desert Tortoise on the draft Desert Tortoise Recovery Plan, which has not been formally approved or adopted by the U.S. Fish and Wildlife Service. Instead, we believe that the final approved recovery plan, released in 1994, is the controlling recovery plan for Desert Tortoise.

There is a potential that significant resources could be wasted on restoration, given the known difficulty of returning disturbed desert land to good quality habitat. How the habitat enhancement and restoration actions on pages 14 and 15 relate to the discussion of enhancement and restoration following page 18 is unclear. Some of the possible actions seem to be activities that might substitute for things the agencies should be conducting using appropriated funds (e.g. control and management of activities—such as ORV use—that threaten the sand community), are inappropriate (e.g., decommissioning unneeded infrastructure), or potentially not worth the cost given the ecological benefit (removal of certain exotic species like Russian thistle which are most abundant immediately after events that disturb the soil but which naturally decrease in subsequent years).

The IMS has little to say about the effects of the "temporary" disturbance of desert soils, or about the feasibility of restoration and invasive species removal as mitigation actions that would yield long-term beneficial effects without requiring management beyond an initial recovery and native species establishment period. We counsel extreme caution in qualifying these activities as compensatory mitigation options. Nor would we include research and monitoring aimed at discerning natural from human-caused habitat effects (see IMS at 19) as appropriate compensatory mitigation.

The IMS does list invasive plant control as a possible mitigation measure but offers almost no details other than noting the 1985 fringe toed lizard recovery plan and/or the 1997 flat-tailed lizard range-wide management plan identified activities benefiting species recovery which include the "removal or elimination of Russian thistle and other exotic species." This is a poor example, since Russian thistle is notorious for invading recently disturbed areas and rapidly decreasing in abundance in subsequent years. Control of Russian thistle is highly unlikely to contribute to long-term restoration of habitats. However, the control of some invasive plants in some habitats can be a necessary step in the long-term successful restoration of native vegetation. Guidance allowing the control of invasive plants as a mitigation measure only when it is deemed both necessary for long-term restoration of the habitat and unlikely to require long-term management to halt re-invasions once the native vegetation has re-established would be appropriate here.

We recommend that the emphasis on providing long-term benefits to listed species and other plants and wildlife be stated by replacing the following statement:

> *"where enhancement and restoration consists of re-vegetation of a site, maintenance beyond an initial establishment period should be minimal, and long-term management should consist of limiting habitat degradation" (IMS, page 19)*

with one that is stronger and that applies to all habitat enhancement actions (as opposed to land acquisitions):

> *"Only habitat enhancement actions deemed likely to provide long-term benefits to listed species and other plants and animals without necessitating additional funding or management should be approved as mitigation."*

Habitat enhancement activities most likely to meet these criteria include:

- Permanent and effective closure of roads and off-road vehicle activity areas.

- Fencing of roads to prevent road kill of tortoises or other animals while allowing use of habitat near roads.

- Permanent retirement of grazing allotments, particularly in Mohave ground squirrel and Desert Tortoise conservation areas.

- Permanent removal of feral burros and horses. The agencies responsible for managing the lands where these animals are present would have to commit to permanently closing any wild burro or wild horse management areas in question (i.e., not allowing the return of burros or horses). Wild burro and horse management areas currently occupy only relatively small areas in the Mojave and Colorado in CA, so only relatively small amounts of habitat enhancement could be accomplished in this manner.

- Permanent removal of invasive plants, where proven to be technically feasible. This is likely to be successful with only a few species and in only in select areas. Tamarisk control can be effective and yield long-term benefits, especially where hydrology is not significantly altered or can be restored, and tamarisk removal is likely to be followed by regeneration or restoration of native riparian species which can prevent tamarisk re-invasion. We are not aware, though, of successful, large-scale, long-term control of invasive annual grasses or of Saharan mustard in the California deserts, although efforts to prevent their spread into currently un-invaded areas have shown greater promise.

- Removing barriers and obstacles that interfere with or prohibit wildlife movement, or creating new wildlife passages where barriers and obstacles cannot be removed (e.g., underpasses or overpasses to highways).

D. The IMS Fails to Show that the Mitigation Actions will Contribute to Species Conservation or How Species will Benefit From the Mitigation Actions.

As discussed above, the mitigation actions are too vague and/or flawed to determine how the IMS will actually benefit any particular species. Indeed, the only discussion about where recovery actions should take place is limited to one paragraph on page 21 in which the IMS states that the recovery actions conceptual areas "should occur where the greatest benefit to listed species can occur" with an emphasis on acquired lands or critical habitat. This discussion of where recovery actions should occur is not linked to any specific species or area and thus becomes too vague to provide any guidance for implementation.

In addition, the following are deficiencies currently found within Appendix B: Recovery Actions --

Condor: Several large-scale wind energy projects proposed or under construction in the Tehachapi Mountains near the Antelope Valley and Tehachapi, CA areas may pose considerable risk to Condors. These risks may not be addressed adequately in environmental reviews and involvement by CDFG and FWS may be lacking.

Desert Tortoise: The applicable recovery plan was approved in 1994; the draft revised plan has not been approved. Recovery actions that should be implemented under the interim strategy are included in the 1994 recovery plan and include but are not limited to:

- Fencing and movement culverts under major roads and highways located within critical habitat units and conservation ACECs.
- Elimination of cattle grazing in critical habitat units and conservation ACECs (e.g., Ord Mountain Allotment and allotments remaining in the Eastern Mojave)
- Acquisition of private lands within critical habitat units and conservation ACECs.
- Mechanical closure and restoration of designated closed vehicle routes on public lands, especially in the WEMO planning area, with high priority given to all public lands within the Fremont-Kramer and Superior-Cronese Critical Habitat Units.

Under an interim mitigation strategy, augmentation of populations within DWMAs or conservation ACECs should not be allowed as a recovery action, which would include translocation or head-starting.

Mohave Ground Squirrel: Predation of this species has not been studied or established as a threat and should not be considered as a recovery action at this time. Studies and research, although important for understanding the life history and ecology of this species, are not mitigation and should not be included in the interim mitigation strategy. Closure and rehabilitation of off-road vehicle routes and elimination of sheep and cattle grazing from allotments in the WEMO area should be included as priority interim mitigation actions.

Allotments include the Cantil Common, Tunawee, Lava Mountains, and Rudnick Common and Walker Pass Common.

E. The IMS Also Fails to Demonstrate How it will Result in the Implementation of Mitigation Actions within a Reasonable Time Relative to the Impact on the Affected Species.

While SB X8 34 required that the IMS provide information about the timing of the implementation of mitigation actions, there is no information in the document relating to timing of mitigation actions. This is a specific statutory requirement that must be address in the final IMS.

5. **The Basis for Fee/Cost Determination is Unknown**.

We strongly support methods to ensure that the state fully recovers the costs of mitigation – acquisition, restoration and long term stewardship, including the cost of adaptation measures in the face of change, and we urge the Department to choose an approach that avoids financial risks to the state and is based on direct experience rather than estimations of costs.

While the IMS notes that the final cost of compensatory mitigation cannot be determined until each project is permitted, estimated costs are developed using an average of costs from two multi-species plans to provide a range. This seems highly questionable, especially since no explanation is given for why the acquisition experience of these two plans is relevant to the DRECP area, why an average of the two costs would be better than the selection of most likely costs based on contemporary market data, why the noted inflation escalation factor was not used, and why there is such a very wide range in specific items in the acquisition costs for the two past plans. There is no explanation of what specific factors would be applied to determine the DRECP costs. Furthermore, this approach sets no clear guidance on how the "full cost accounting" principles of the statute will be administered and costs for individual projects calculated. It is also not clear how costs will be determined and applied if the compensatory mitigation takes the form of restoration or enhancement. Given this lack of clarity in how costs will be determined, the following statement is confusing: "Due to uncertainty in the State's economy and the real estate market in general, and the concomitant effect of rising property values resulting from large-scale acquisitions for conservation, a conservative approach to setting the per acre fee/costs estimates is justified."

A better approach would be to launch promptly an acquisition program for priority lands using the $10 million advance mitigation fund and use that experience to set mitigation fee costs for both buying into the "bank," and for setting the fee-in-lieu amounts. Fees based upon projections that are in turn based on past experience would seem a very unreliable basis to fully cover mitigation costs. Property values, especially as limited private lands are increasingly acquired, will rise, and fees must accurately track—and cover—the current market value of target parcels. The best way to accomplish this is for the state or its acquisition agents to directly enter and stay active in the market. Similarly, if compensatory mitigation is to take the form of restoration and enhancement, and fees are to be based on the costs of that activity rather than per

acre acquisition costs, experience actually carrying out these actions would seem the best way to price the activity.

How mitigation obligations will be set and administered for renewables projects beyond those for the fast track projects is unknown. However, the IMS period offers federal and state agencies an excellent opportunity to develop agreement on a robust mitigation program that will for the first time focus on desert-wide conservation priorities and preserving healthy natural communities, assisting in making the DRECP a success. The undersigned organizations are ready to assist the Department in working out this important component.

6. **Mitigation based on Restoration or Enhancement of Soils is Inappropriate**.

Soil integrity is critical to the maintenance of biodiversity in the Mojave Desert. Following soil disturbances or the disruption of natural processes that maintain soils, desert ecosystems are highly prone to invasion by non-native species, erosion of fertile topsoil, reduced infiltration of precipitation, increases in fire frequency, and loss of native plant and animal species. Unfortunately, soil crusts are easily crushed, buried, or removed. They can be extremely slow to recover, with estimated unassisted recovery times ranging from several years to millennia.

Restoring many Mojave Desert plant communities after disturbance is extremely difficult. On the whole, these efforts have been very costly and resulted in only partial ecological recovery where they have been successful at all. Many native Mojave Desert plants, such as creosotebush (Larrea tridentata), are so long-lived and slow-growing that restoring them from seed to a pre-disturbance condition is not feasible on a time scale relevant to people. Restoration and enhancement actions should ordinarily not qualify as compensatory mitigation, but, if included, they must clearly state measurable and well-defined goals for restoration, recognize the difficulty of completing a successful restoration project in the desert, and include a time line for monitoring and adaptive management that is relevant to the long-lived, slow-growing species found in the Mojave Desert. A better strategy would be to make clear in the IMS that avoidance of soils disturbance is a cardinal principle of permitting desert renewable facilities.

7. The Draft IMS Must Be Reviewed the DRECP Independent Science Advisors.

As required by law, the draft IMS must be reviewed by the DRECP Independent Science Advisors, with specific attention to the design and location of mitigations actions. To date, no such review has occurred. We strongly recommend that such a review occur prior to the finalization of this strategy.

8. **The Analysis of Qualified Renewable Energy Projects Needs to Be Updated.**

In Appendix A of the draft IMS, entitled "Qualified Renewable Energy Projects," the following projects may need alternatives or a reduced project size due to the level and extent of impact on natural resources:

Imperial Valley Solar
Calico Solar

Ivanpah SEGS
Palen Solar
Blythe Solar

Conclusion

We appreciate the opportunity to comment on the IMS, and stand ready to work with the Department to improve and implement the strategy.

Sincerely,

Kim Delfino
Defenders of Wildlife

Johanna Wald
Natural Resources Defense Council

Laura Crane
The Nature Conservancy

Alice Bond
The Wilderness Society

cc: Terry O'Brien, California Energy Commission
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