



# BOARD OF SUPERVISORS COUNTY OF INYO

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August 16, 2011

California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

Jim Bartel, Field Supervisor  
Carlsbad Fish and Wildlife Office  
U.S. Fish and Wildlife Service  
6010 Hidden Valley Road, Suite 101  
Carlsbad, CA 92011

**DOCKET**

**09-RENEW EO-1**

DATE AUG 16 2011

RECD. AUG 23 2011

**Re: Notice of Intent and Notice of Preparation for Joint Environmental Impact Statement/  
Environmental Impact Report for Desert Renewable Energy Conservation Plan  
Docket No. 09-RENEW EO-01**

To Whom It May Concern,

On behalf of the Inyo County Board of Supervisors, thank you for the continued opportunity to participate in development of the Desert Renewable Energy Conservation Plan (DRECP). Inyo County has a long history of providing renewable energy generation for California and the nation, and we are proud that our County possesses the resources necessary for future renewable energy production. The Inyo County Board of Supervisors has consistently expressed its support of appropriate renewable energy development, and we hope that Inyo County will be able to participate in DRECP implementation.

**Scope of the Environmental Impact Statement/Environmental Impact Report**

We are encouraged that the Renewable Energy Action Team (REAT) agencies are engaging in a comprehensive process to streamline renewable energy permitting through the DRECP and the joint Environmental Impact Statement/Environmental Impact Report (EIS/EIR). While we support proper mitigation of potential environmental impacts resulting from renewable energy development, we are discouraged that the DRECP process is considering eliminating more private property in Inyo County, despite the County's previous input. We remind the REAT agencies that more than 98 percent of the County is in public ownership, and 65 percent is designated Wilderness. With this land ownership pattern, every acre of private land that is converted to public ownership is significant and adverse to the people of Inyo County. With this in mind, we offer the following comments on the scope of the EIS/EIR.

**Land Use and Planning** – the EIS/EIR should address land use and planning issues between the DRECP and the County's planning policies and land use procedures.<sup>1</sup> As previously requested, alternatives to further taking private lands for biology-related mitigation in our County should be considered, including enhancing existing public lands and considering calculating past Wilderness designations for biology-related mitigation. The analysis should include past, present, and reasonably foreseeable future land use actions that have impacted the County's private land base.

**Infrastructure, Services, Housing** – the EIS/EIR should evaluate potential impacts on public services, utilities, and housing. Potential impacts to public roads and the County's burden to repair and maintain those roads are of great

<sup>1</sup> Refer to [http://inyoplanning.org/general\\_plan/index.htm](http://inyoplanning.org/general_plan/index.htm) regarding the County's General Plan.

concern. In our County, many of the service providers in the remote areas where renewable energy may be developed may not have the capacity to adequately provide law enforcement and emergency services. The boom-and-bust cycle of resource-driven development may also lead to increased demand for housing, which then may be abandoned after construction due to the relatively low long-term employment opportunities from renewable energy facilities.

**Recreation** – the potential impacts of renewable energy development to recreation should be evaluated. Renewable energy development and potentially biology-related mitigation has the potential to block access to recreation, and mitigation and alternatives to minimize these potential effects should be evaluated. In our County, these impacts should be considered in light of past and continuing efforts to reduce access for motorized recreation.

**Socioeconomics** – the fiduciary benefits of renewable energy development to local agencies should be compared to the costs of providing infrastructure and services for the development. The analysis should consider the boom-bust cycle of resource-driven development – especially renewable energy development that in most cases does not generate substantial long-term employment locally – as well as the opportunity costs of such development. While it is noble to encourage renewable energy development on private disturbed lands, these areas offer local agencies greater potential revenue generation in the long run through other development opportunities, and the socioeconomic effects of their development with renewable energy facilities and/or dedication to biology-related mitigation could be severe, especially in our County with its skewed land ownership pattern.

#### **Coordination**

Based on our preliminary review of the DRECP planning documents, it appears as if the Plan is inconsistent with the Inyo County General Plan, despite the County's previous input. We therefore request continuing and enhanced coordination with the BLM to address and resolve the inconsistencies between the DRECP and the Inyo County General Plan and approved policies. In accordance with 43 C.F.R. 1610.3-1(f), Inyo County hereby informs the BLM of the inconsistencies between Inyo County plans and policies and the DRECP. The County requests staff-to-staff meetings to address these inconsistencies and, ideally, to resolve them.

Thank you for including Inyo County in this important planning process. Please contact the County's Administrative Officer, Kevin Carunchio, at (760) 878-0292 or by email at [kcarunchio@inyocounty.us](mailto:kcarunchio@inyocounty.us) to schedule coordination or if you have any questions.

Sincerely,



Susan Cash  
Chairperson, Inyo County Board of Supervisors

cc: Kevin Carunchio, CAO  
Randy Keller, County Counsel  
Joshua Hart, Planning Director  
DRECP Stakeholders  
Governor Brown  
Secretary Salazar, DOI  
Bob Abbey, BLM  
Dan Ashe, USFWS  
Ren Lohefener, USFWS  
Gerald Hillier, Quadstate  
Regional Council of Rural Counties  
California State Association of Counties  
National Association of Counties