

Board of Supervisors

- District 1 **Bob Buster**
951-955-1010
- District 2 **John F. Tavaglione**
951-955-1020
- District 3 **Jeff Stone**
951-955-1030
- District 4 **John J. Benoit**
951-955-1040
- District 5 **Marion Ashley**
951-955-1050

September 1, 2011

California Energy Commission
Dockets Office, MS-4
Docket No. 19-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
RE: Docket Number 09-RENEW EO-01

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

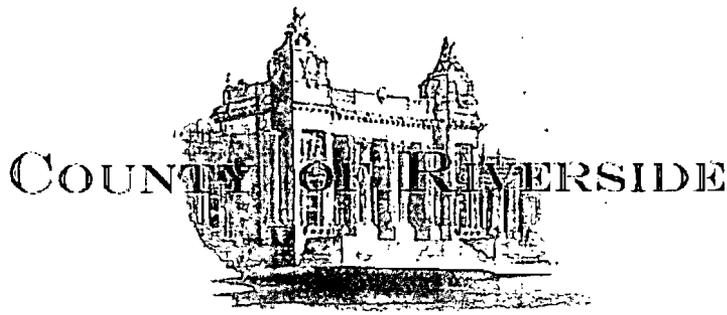
Re: Docket No. 09-RENEW EO-01
 Notice of Intent and Notice of Preparation of a Joint Environmental Impact
 Statement/Environmental Impact Report for the Proposed Desert Renewable Energy
 Conservation Plan (DRECP)

To Whom It May Concern:

Riverside County has a long history of protecting natural communities and endangered species through the development and implementation of widely recognized, large habitat conservation plans. The County has been and will continue to actively participate in the DRECP process.

Riverside County provided written comment on the DRECP in the attached letter of February 8, 2011. As stated in the attached letter, while Riverside County supports renewable energy production and acknowledges the positive effect it will have generally, the County also recognizes that renewable energy production and the associated biological conservation required by the DRECP will result in local impacts and that Riverside County will bear a disproportionately heavy burden for renewable energy production because of its desirable location and vast resources.

DOCKET	
09-RENEW EO-01	
DATE	Sept 01 2011
RECD.	Sept 12 2011



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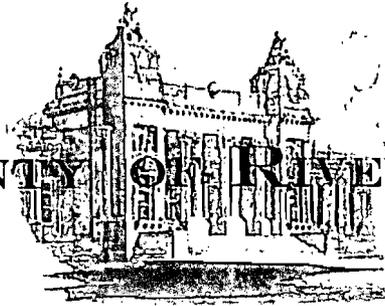
Riverside County appreciates the opportunity to comment and will continue to provide input to the DRECP process through active stakeholder participation. Please feel free to contact Gail Barton, Principal Planner (gbarton@rctlma.org) if you require clarification or additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Buster". The signature is written in a cursive, slightly slanted style.

Bob Buster, Supervisor
First District
Chairman of the Board

COUNTY OF RIVERSIDE



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February 8, 2011

Mr. Dave Harlow

Director, California Desert Renewable Energy Conservation Plan

1516 Ninth Street, MS-46

Sacramento, CA 95814

RE: RIVERSIDE COUNTY'S POSITION ON THE DESERT RENEWABLE ENERGY CONSERVATION PLAN (DRECP)

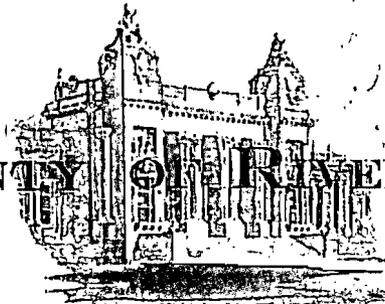
Dear Mr. Harlow:

Riverside County is a recognized leader in the protection of natural communities and endangered species. It developed both the Coachella Valley and Western Riverside Multi Species Habitat Conservation Plans (HCP) and has been implementing them for over ten years. These HCPs balance environmental protection and economic development objectives, while simplifying compliance with endangered species laws.

Consistent with this leadership role, the County has been actively participating in the DRECP process through our designated representative on the DRECP Stakeholder Committee. Although the County supports renewable energy production and acknowledges the positive effects it will have generally, the County also recognizes that conservation required by the DRECP will result in local impacts in the form of lost economic development potential (jobs, property tax revenue, etc.), lost recreation potential and lost historical resources (farmland, historic sites, etc.) Without appropriate ways to reduce these impacts, Riverside County will bear a disproportionately heavy burden for renewable energy production because it is uniquely suited for the location of such facilities. Before Riverside County can support the DRECP, the County needs to be assured that the following matters will be resolved:

- The DRECP will define the total number of renewable energy projects to be permitted in Riverside County through the Plan, the number that will be located on land within the County's jurisdiction, and the number that will be located on land outside the County's jurisdiction.
- The DRECP will define the mitigation required for the renewable energy projects to be permitted wherever located.
- In considering mitigation, the DRECP will evaluate options other than land set-asides such as the payment of fees or the cost of making the local workforce employable in the renewable energy industry.
- The DRECP will encourage renewable energy production at or near the point of consumption.

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- The DRECP will acknowledge that permitted Habitat Conservation Plans will remain intact and that the DRECP will not mandate any additional requirements.
- In spite of the area encompassed by the DRECP, it will, by design, work to preserve the unique values and character of Riverside County.
- The DRECP will establish an integral role for Riverside County in the formal implementation process of the DRECP and will in no way impact local land use control.
- The DRECP will memorialize guarantees to ensure that the burden of acquisition, management, and/or monitoring do not fall on the local jurisdiction(s).
- The DRECP will ensure that lands conserved within Riverside County are managed by land managers selected and overseen by jurisdiction(s) or entities within the County.
- Research done on and for projects within Riverside County will be conducted by local entities.
- The DRECP will ensure that the conservation impacts of renewable energy production are appropriately reduced so that the County does not bear a disproportionate burden of such impacts.

Riverside County intends to continue to contribute to the DRECP process and anticipates that the final product will meet the broad scale needs of local jurisdictions, facilitate the permitting of quality renewable energy projects, and provide for the protection of the environment. Please feel free to contact Gail Barton, Principal Planner (gbarton@rctlma.org) if you require clarification or additional information.

Sincerely,

A handwritten signature in black ink that reads "Bob Buster". The signature is written in a cursive, slightly slanted style.

Bob Buster, Supervisor
First District
Chairman of the Board