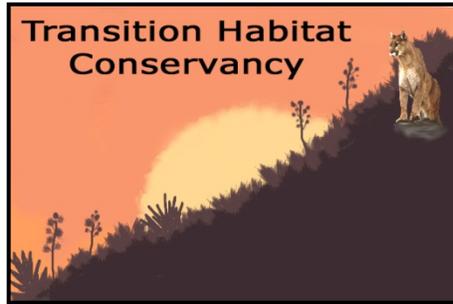


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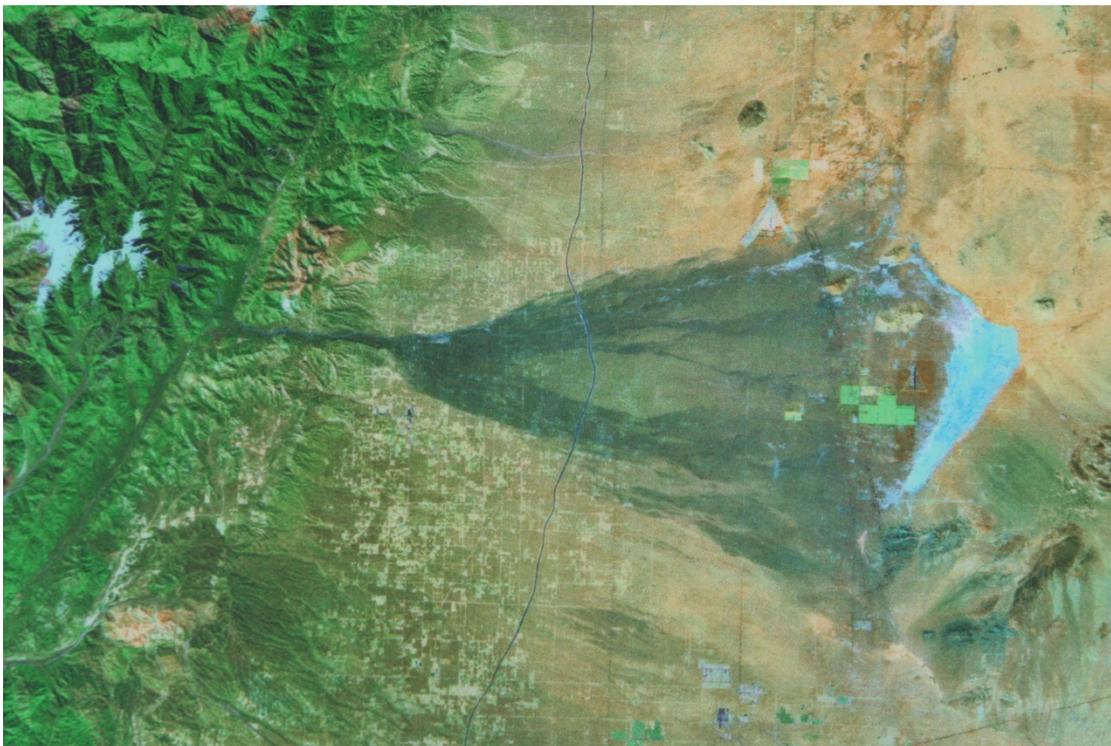
May 22, 2012

These comments are from Jill Bays, DRECP Stakeholder for California Council of Land Trusts and President of Transition Habitat Conservancy.

Comments on Scenario 1

Scenario 1 has DFA areas over Sheep Creek Wash (just east of intersection of Highway 18 and 395). Sheep Creek Wash is an active, un-incised alluvial fan. This wash drains a third of the San Gabriel Mountains. The flash floods on this alluvial plain are epic, historic and dramatic. See this U Tube and Sheep Creek Fan below.

<http://www.youtube.com/watch?v=qi-ttyYan74>



Map on Scenario 1 looks good in LA County. Also looks good from a standpoint that there are no DFAs in the Desert Wildlife Management Areas (DWMA)/ACECs in San Bernardino County. The LA County Significant Ecological Areas (SEAs) need to be included as high biological resources and the DFA's need

to be made outside LA County's SEAs. Consider LA County's SEAs for the Reserve Design. THC and other conservation groups in the West Mojave have active acquisition plans and conservation easements in the SEA's all along the San Andreas Fault Rift Zone (also a good reason not to develop there is the San Andreas Fault).

Scenario 2 does not have DFA's in the SEAs so that is good, however the DFAs in San Bernardino County in Scenario 2, (also 3 and 4, 5 and 6) have other problems. The area west of 395 and north of 138/15 are shown as DFA's. Most of that land is privately owned and rural residential 2.5 acre (Oak Hills, Phelan, Adelanto) and most of it is already built out to that level with houses. We're not sure where these developments would take place unless you are going to remove homes.

Map 6

This Scenario is completely unacceptable.

There are DFAs in DWMA's, ACECs and Critical Desert Tortoise Habitat as well as in Mohave Ground Squirrel Conservation Areas. These can be found in many locations including the Fremont-Kramer and Superior-Cronese DWMA's (ACECs) North of 58, east of 395, south of 58 east of 395 etc.

Currently SB 34 funds via DFG are being spent and credits are being sold for conservation as well as Renewable Energy ARRA Project mitigation lands being purchased for habitat. Transition Habitat Conservancy owns almost 4,000 acres in these ACECs and has plans to acquire at least that much more in these areas this year. Parcels purchased for conservation in the last 6 months and parcels in escrow are shown below on the map.

There are MANY examples of why siting in scenario 6 is a bad idea, but too many to list.

Summary recommendations are to keep DFA's out of Wilderness Study Areas (WSA's), Desert Wildlife Management Areas (DWMA's), Areas of Critical Environmental Concern (ACEC's), land adjacent to state or national parks, land adjacent to conservation lands held or managed for conservation, land adjacent to lands marked for conservation by Wildlife Conservation Board or DFG, in wildlife linkage corridors, important bird areas as identified by Audubon Society, critical habitat's, headwaters, infiltration areas, and riparian areas are lands that are not suitable for renewable energy development.

Sincerely Yours,

Jill

A handwritten signature in blue ink, appearing to read "Jill Boyer".

Rounds 1, 2 & 3 parcels - DWMA - Transition Habitat Conservancy

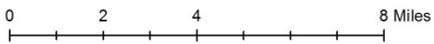
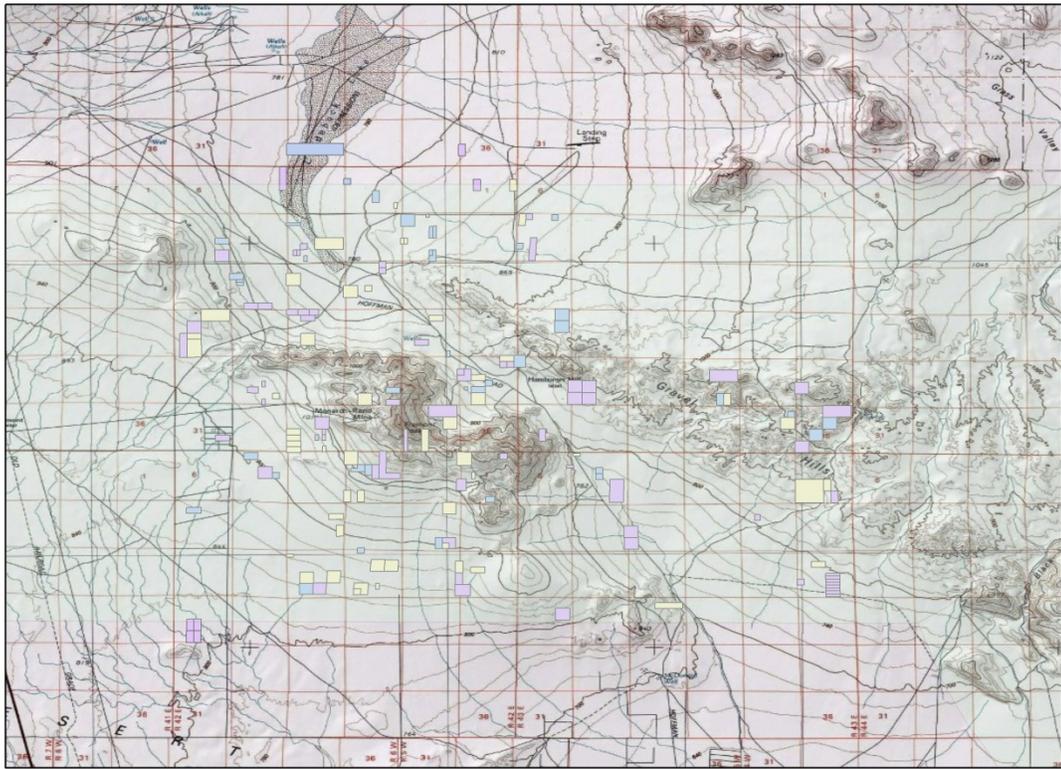


FIGURE 3.

Fremont-Kramer DWMA Ecological Reserve , desert tortoise (*Gopherus agassizii*) critical habitat and Western Mojave (WEMO) Desert Wildlife Management Areas (CDFG 2007).

