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Director

January 23, 2013

California Energy Commission
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California Energy Commission

DOCKETED

09-RENEW EO-1

TN # 69262

JAN 23 2013

**Subject: DRECP – San Bernardino County Concerns Regarding the Evaluation of DRECP
(Desert Renewable Energy Conservation Plan) Alternatives**

To Whom It May Concern:

The County of San Bernardino supports development of renewable energy, and has participated in the DRECP planning process since its inception in 2010. The Board of Supervisors confirmed the County's commitment to responsible planning for renewable energy development and habitat conservation by approving a Memorandum of Understanding between the County and the California Energy Commission (CEC) on December 8, 2012, providing for the County's continued participation in the DRECP. The following comments on the DRECP alternatives are made based on the County's adopted position on desert renewable energy projects.

The County strongly recommends that additional alternatives be developed to recognize the economic impacts of the DRECP on non-energy development potential, transportation and communications linkages, continued access to mineral resources and recreation on public lands in the planning area. Although "Renewable Energy" is presumably the focus of the DRECP, the impacts of the "Conservation Plan" components of the current plan alternatives are so wide-ranging that additional analysis is needed to study alternative conservation strategies. Additional alternatives should consider identifying much larger Development Focus Areas, allowing for a range of private development options. Consideration should also be provided for protection of access to the extensive mineral resources of the desert and the important economic impacts those resources have on the economy of this region. Finally, the value of continued access to public lands for recreation must be recognized in any proposed land use plan or conservation strategy alternative. Off road recreation in the San Bernardino County desert is a unique experience that draws visitors from all of Southern California and beyond. Recreation users in the hundreds of thousands utilize desert roads and trails to explore the cultural and natural resources of the desert. These users are important to the regional economy, and are not only interested in off-highway vehicle recreation areas, but also drive and explore historical roads throughout the desert region. The impacts of the DRECP on off-road recreation and the potential economic losses in desert communities should be analyzed in the proposed plan, and avoided if at all possible.

GREGORY C. DEVEREAUX
Chief Executive Officer

Board of Supervisors
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Approximately seventy percent of the 22.5 million acres covered by the DRECP are identified as Conservation Areas, while five to ten percent of the area is identified for proposed renewable energy Focus Areas, of which approximately fifteen percent is anticipated to be developed with renewable energy resources. Since Military lands account for an additional thirteen percent of the Plan Area, this leaves a very small area (less than fifteen percent) for all other uses, including existing development and potential new development. Assuming that fifteen percent of the Development Focus Areas will be developed for renewable energy development fails to recognize the effects of the mitigation strategies on land values and remaining development potential for non-energy uses in these areas. The Plan alternatives anticipate that development on private lands will be mitigated on private lands at multiple ratios, further impacting the availability and associated costs of private land for development. San Bernardino County opposes habitat mitigation strategies that require acquisition of private property at multiple acreage ratios to the development site. The County favors habitat mitigation through enhancement of existing conservation areas and public lands, including retirement and restoration of grazing allotments. The November 2012 MOU adopted by the Bureau of Land Management (BLM) and the California Department of Fish and Game (CDFG) and the December 2012 BLM Policy CA-2013-006 support this approach. An in-lieu mitigation fee program or a pool of credits in a habitat conservation program would streamline the renewable energy entitlement process, and could fund a true conservation strategy including habitat restoration, species recovery monitoring and predator control.

The Description and Comparative Evaluation of Draft DRECP Alternatives does not provide sufficient consideration of the many, multiple uses that have historically occurred and continue to be an important part of the economy of San Bernardino County and the region. Primary telephone and internet connections between the West Coast and the rest of the U.S. traverse the desert areas covered by the DRECP. High pressure gas lines also traverse these desert areas and are proposed for further expansion. San Bernardino County has always been a crossroads of transportation, energy, resources, and communications that link the West Coast with the rest of the country. The primary rail links that carry freight between west coast ports and the rest of the country cross the San Bernardino County desert. New and expanded rail corridors are proposed to provide passenger rail as an alternative to additional vehicular traffic. Highways I-15 and US 395 provide primary access to much of the Western U.S. I-40 and CA 58 provide linkage to the San Joaquin Valley and the rest of the Southwestern U.S. Highways and future passenger rail routes will require traveler services, and may create other economic development opportunities, which should be recognized and identified as a resource worthy of protection in the DRECP.

The Mojave Desert is uniquely rich in mineral resources which continue to be important to the economy of the region, and must be protected and not limited by habitat conservation strategies. The discussion of mineral resources in the chapter 3.6 is informative, but it should be carried forward into the conservation strategy for each alternative, to clearly provide for conservation and beneficial use of mineral resources in the designated Conservation Areas as well as the Development Focus Areas. The DRECP should explicitly recognize and protect existing and potential future mining activities in every land use alternative. Plans should provide for mining activities to continue, or to be established concurrent with alternative energy project development, and potentially concurrent with habitat conservation, assuming that areas to be disturbed by mining will ultimately be restored through reclamation of the mine.

We appreciate the opportunity to comment on the proposed DRECP alternatives and encourage the REAT (Renewable Energy Action Team) to consider a much broader range of alternatives that will consider and address the economic impacts of the proposed land use and conservation strategies identified in the DRECP. For more information and for future coordination of DRECP review, please contact Nelson Miller, Contract Planner in the San Bernardino County High Desert Government Center, Nelson.Miller@lus.sbcounty.gov.

Sincerely,



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