RIVERSIDE COUNTY
PLANNING DEPARTMENT

Carolyn Syms Luna
Director

California Energy Commission
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January 24, 2013

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

RE: Comments on *Description and Comparative Evaluation of Draft DRECP Alternatives*

Dear Mr. Harlow:

Riverside County appreciates the opportunity to comment on the *Description and Comparative Evaluation of Draft DRECP Alternatives* and the associated information that has been distributed in conjunction with this document. Riverside County, having developed and implemented numerous Habitat Conservation Plans (HCP), understands both the complexities of drafting a workable HCP and the benefit of an HCP that balances environmental protection and economic development objectives, while simplifying compliance with endangered species laws.

The County has been actively participating and providing input to the DRECP process through our designated representative on the DRECP Stakeholder Committee, meetings with DRECP staff, and written comment. This comment letter should be considered in the context of previous oral comments, staff discussion, and written comment. While Riverside County supports renewable energy production and acknowledges the positive effects it will have generally, the County continues to have concerns regarding the proposed DRECP.

Riverside County would like to commend the DRECP leadership for taking the interim step in preparing the *Description and Comparative Evaluation of Draft DRECP Alternatives* rather than rushing directly into the preparation of the Draft DRECP and EIR/EIS as earlier contemplated. Further, we acknowledge that an undertaking the magnitude of the DRECP requires involved consensus building, a well-structured HCP, a defined and dedicated funding strategy, and a well-planned implementation structure and process. We cannot over emphasize the importance of addressing these issues in order to craft a successful HCP, even if it means further easing the timeframe for completion of the HCP.

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The *Description and Comparative Evaluation of Draft DRECP Alternatives* reflects a refinement and clarification of the transmission impacts and concrete proposals for conservation and management actions. With regard to these areas we have the following comments:

- While transmission essential to move the anticipated energy production is critical to the renewable energy goals, an identification of both the amount and location of areas impacted within the Plan Area is critical to the evaluation of the total mitigation required for transmission impacts under the Plan. Further, it is important to identify the amount and location of areas required for transmission outside of the Plan Area in order to evaluate the feasibility of constructing the transmission with the added burden of securing mitigation without the benefit of the DRECP.

- Suggested conservation and management actions provide important insight into how public lands may be used to assist in reserve assembly while allowing for analysis of the impact to these public lands resulting from the limitations on other uses because of their designation as conservation lands under the DRECP.

- A number of conservation and management actions speak to water resources and the maintenance, restoration, and conservation of hydrological processes. We are concerned as to how the Plan will integrate the added demand on water resources resulting from the renewable energy development with protecting and enhancing those same water resources that have been addressed as necessary to meet conservation goals.

While several alternatives were mentioned as potential models, the document states that the implementation structure has not yet been defined. It is understandable that the organizational structure of the body that will implement the Plan cannot be fully defined until the participants are identified, but it is critical to have a detailed understanding of the specific process that will be employed to construct the reserve system and effect the required project by project mitigation. Organizational structure and implementation process are two separate and independent issues. The implementation process is as critical an element to the success of the Plan as is the definition of the development focus areas and the conservation strategy. Without a clear understanding of the implementation process it is impossible to determine that projects will flow through the system ensuring that the Plan will facilitate approvals and expedite compliance with endangered species laws as anticipated and that the reserve system will be constructed in a systematic and logical fashion to ensure that appropriate conservation is in step with development.

The DRECP has not proposed an effective funding strategy. The DRECP must define sufficient funding to ensure that the Plan as drafted does not place an added burden on the local jurisdictions. The document states that funding for the DRECP will not be limited to mitigation fees paid for covered projects, but will require funding from sources other than mitigation fees. Some of the potential sources cited are state bond funds and grants, federal grants, and private donations. The DRECP must establish a defined and dedicated long-term, reliable funding source. Anything short of that will jeopardize both the DRECP and the local jurisdictions that will

bear the burden of the unmet obligations of an unfunded or underfunded program. Funding must be ensured under the DRECP and not rely on the ability of an implementing body to secure complementary funding to the mitigation fees to provide adequate and reliable funding for the Plan.

Riverside County commends the DRECP for preparing the *Description and Comparative Evaluation of Draft DRECP Alternatives* and for taking the added time necessary to more fully consider the elements critical to a successful HCP. We remain open to a discussion of the opportunities and issues specifically related to the proposed alternatives incorporated in the *Description and Comparative Evaluation of Draft DRECP Alternatives* and will work with DRECP staff to set a meeting date that will include the appropriate County staff. Riverside County remains dedicated to sharing our views and expertise as contributors to the DRECP. If you have any questions or comments, please contact Gail Barton (gbarton@rctlma.org).

Sincerely,

Carolyn Syms Luna

Carolyn Syms Luna
Riverside County Planning Director