



MAJESTIC REALTY CO.

R.E. License #00255328 (CA)

February 23, 2015

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Via fax: 916-654-4421

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

California Energy Commission

**DOCKETED**

**09-RENEW EO-1**

**TN # 75322**

**FEB 23 2015**

Re: DRECP NEPA/CEQA Docket No. 09-RENEW EO-01  
Comments of Majestic Realty Co. re Property in Daggett, California

Dear Commission Staff:

Our affiliate, Daggett Ranch LLC, owns approximately 190 contiguous acres of land, located in an unincorporated part of San Bernardino County, California, commonly known as Daggett, more specifically shown on Exhibit "A" to this letter (the "Daggett Ranch Land"). For your reference, I have included the San Bernardino County Assessor Parcel Numbers for the Daggett Ranch Land on Exhibit "B" also attached to this letter.

The Daggett Ranch Land is included within the study area of the Desert Renewable Energy Conservation Plan ("DRECP"). In the Draft DRECP Interagency Preferred Alternative (Figure II.3-1), it appears that portions of the Daggett Ranch Land have been given three different proposed designations:

- (1) "Development Focus Area, Preferred Alternative,"
- (2) "Impervious and Urban," and
- (3) Undesignated.

I understand that in preparing the DRECP the Commission staff is evaluating an area of over 22 million acres and, accordingly, may not have focused with granularity on specific parcels such as the Daggett Ranch Land. By this comment letter, I am providing more detailed information on the uniform characteristics of the Daggett Ranch Land. We request that the portions of the Daggett Ranch Land that are proposed to be Undesignated and "Impervious and Urban" should instead be designated as "Development Focus Area, Preferred Alternative".

I have attached a letter from our environmental consultant, Environmental & Regulatory Specialists, Inc., in support of this request.

Sincerely,

MAJESTIC REALTY CO.

Fran Inman  
Senior Vice President

Attachment: Exhibit "A" EARSJ Letter dated 2/23/2015  
Exhibit "B" Assessor Parcel Number

February 23, 2015

Via fax: 916-654-4421



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

re: DRECP NEPA/CEQA Docket No. 09-RENEW EO-01  
Analysis in Support of Comments of Majestic Realty

Dear Commission Staff:

Our client, Daggett Ranch LLC, which is controlled by Majestic Realty Co., owns approximately 190 contiguous acres of land, located in an unincorporated part of San Bernardino County, California, commonly known as Daggett, more specifically shown on Exhibit "A" to this letter (the "Daggett Ranch Land"). Our client engaged us to inspect the entirety of the Daggett Ranch Land.

The Daggett Ranch Land is included within the study area of the Desert Renewable Energy Conservation Plan ("DRECP"). In the Draft DRECP Interagency Preferred Alternative (Figure II.3-1), it appears that portions of the Daggett Ranch Land have been given three different proposed designations:

- (1) "Development Focus Area, Preferred Alternative,"
- (2) "Impervious and Urban," and
- (3) Undesignated.

Based upon our inspection of the Daggett Ranch Land, we conclude that there are no meaningful differences in the environmental attributes as between the Undesignated Daggett Ranch Land and the Daggett Ranch land designated as "Development Focus Area, Preferred Alternative" and "Impervious and Urban". The lack of distinction includes no apparent differences in the presence/absence of habitat, endangered or sensitive species, blue line stream(s) or other natural resources.

Based upon our review our client is providing this letter in support of its request that the portions of the Daggett Ranch Land that are proposed to be Undesignated and "Impervious and Urban" should instead be designated as "Development Focus Area, Preferred Alternative".

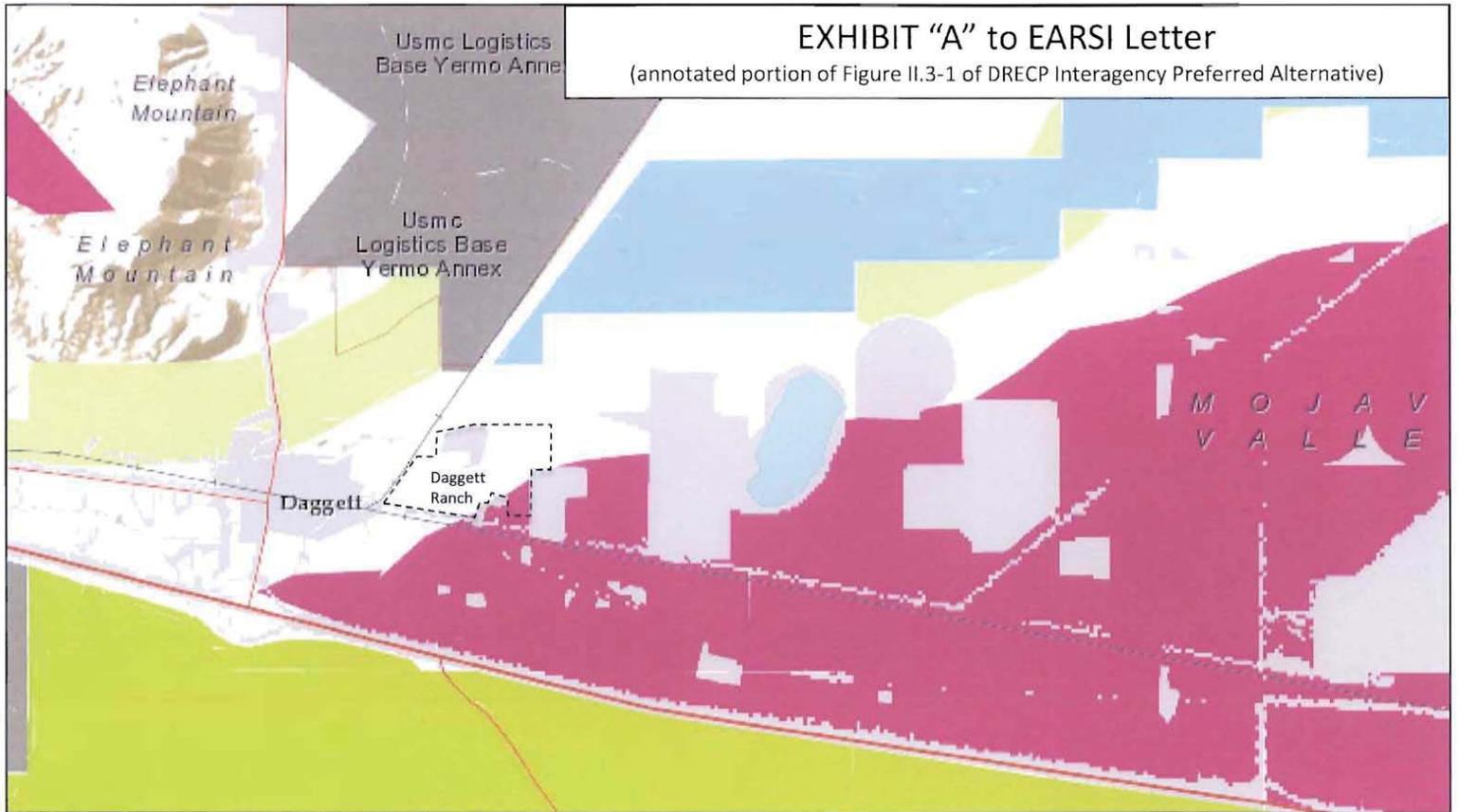
Sincerely,

A handwritten signature in black ink, appearing to read "David J. Tanner", written in a cursive style.

David J. Tanner  
President

# EXHIBIT "A" to EARS Letter

(annotated portion of Figure II.3-1 of DRECP Interagency Preferred Alternative)



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|--|---|--|--|
| <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 10px; height: 10px; border: 1px solid black; margin-right: 5px;"></span> DRECP Boundary</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: purple; margin-right: 5px;"></span> Solar Energy Zones, DRECP</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: pink; margin-right: 5px;"></span> Development Focus Areas, Preferred Alt.</li> </ul> <p><b>Study Area Lands, Preferred Alt.</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: orange; margin-right: 5px;"></span> Special Analysis Areas</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: red; margin-right: 5px;"></span> Future Assessment Areas</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: brown; margin-right: 5px;"></span> DRECP Variance Lands</li> </ul> | <p><b>Reserve Design Envelope (Existing Cons.), DRECP</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: green; margin-right: 5px;"></span> Legislatively and Legally Protected Areas</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: olive; margin-right: 5px;"></span> Military Expansion Mitigation Lands</li> </ul> <p><b>Reserve Design Envelope (NLCS), Preferred Alt.</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: yellow; margin-right: 5px;"></span> National Landscape Conservation System</li> </ul> | <p><b>Reserve Design Envelope (ACECs &amp; Wildlife Allocation), Preferred Alt.</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: lightblue; margin-right: 5px;"></span> Areas of Critical Environmental Concern</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: darkblue; margin-right: 5px;"></span> Wildlife Allocation</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: lightyellow; margin-right: 5px;"></span> Conservation Planning Areas, Preferred Alt.</li> </ul> | <p><b>Other Lands, DRECP</b></p> <ul style="list-style-type: none"> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: lightgrey; margin-right: 5px;"></span> Impervious and Urban</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: darkgrey; margin-right: 5px;"></span> Military</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: purple; margin-right: 5px;"></span> Tribal Lands</li> <li><span style="display: inline-block; width: 10px; height: 10px; background-color: tan; margin-right: 5px;"></span> OHV Areas</li> </ul> |
|--|---|--|--|
- Approximate Boundary of Daggett Ranch Land



EXHIBIT "B"

Daggett Ranch, LLC

San Bernardino County Assessor Parcel Numbers:

0516-251-08

0516-291-03

0516-291-04

0516-291-05

0516-291-06

0516-291-07

0516-301-02

0516-301-03