

Lair Restoration Consulting

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California Energy Commission

DOCKETED

09-RENEW EO-1

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

DATE: February 23, 2015

RE: Draft DRECP document(s) and Associated EIR/EIS.

I am a practicing environmental and ecological consultant, and resident of the High Desert, headquartered in Hesperia, CA. I am also a recent retiree from two federal land management agencies – the Natural Resources Conservation Service (USDA), and the Bureau of Reclamation (USDI) – with which I had a federal work career (state and national levels) addressing technical assessment and solutions for erosion control, revegetation, and weed management concerns across the southwestern United States. I currently consult with the Mojave Desert Resource Conservation District (Victorville, CA) as a technical specialist involved with planning, design, implementation, and monitoring of conservation practices to address these concerns. I have particular experience and credentials in restoration, management, and monitoring of desert upland and riparian ecosystems which will be directly, and perhaps adversely affected by the current draft DRECP documentation.

Many people, organizations, and agencies have expressed concern regarding the extraordinary and difficult complexity of the document. Of concern also is its apparent insufficiency in addressing proper modes, siting, and scale of energy generation and distribution, impacts to adjacent and nearby private property, and protection of multiple uses within the desert environment, among other concerns. I support these comments and related concerns. However, my primary issue is with the paucity of thought, planning, and written materials addressing both *development and enforcement* of technical measures to address erosion control, disturbed site reclamation (as appropriate), and weed management on development footprints (whether solar, wind, thermal, or other technologies).

In my experience in San Bernadino, Los Angeles, and Kern Counties, where solar and wind developments have been installed in recent (last 5-10) years, these aforementioned technical measures have received little serious consideration by state and county regulatory agencies, as evidenced by significant on-site erosion and weed proliferation occurrences. Many facilities, for

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both wind and solar power generation, are woefully inadequate in applied measures on the significant areas of highly disturbed soils to 1) control erosion from wind; 2) control incipient invasive species populations; and 3) reclaim or rehabilitate disturbed sites via revegetation and/or bioengineered structural measures. Until stronger language and technical guidelines / requirements to address these ecological issues are further considered and included in any draft DRECP document(s), soil resource degradation for short- and long-term periods will continue to occur as a direct result of facility installation and associated poor ordinance enforcement and follow-up management.

This resource degradation, primarily in the forms of erosion (with resultant sand and dust movement off-site), and increased potential for weed establishment and weed seed dispersal, will adversely impact not only *efficient and durable operation of the facility itself*, but also neighboring lands (affecting resource stability, land values, and costs of ameliorating conservation practices).

The DRECP and associated documentation in its current form is inadequate in addressing these concerns, particularly from planning and enforcement standpoints pertaining to 1) technical requirements vetted through experts in the fields of erosion control, revegetation, and weed management; and 2) enablement of adequate and comprehensive enforcement procedures at multi-governmental levels, in order to assure that technical requirements for site stabilization are fully met in a timely manner.

I encourage your strong reconsideration and revision of the DRECP in its current format before any approval is issued. I would be glad to provide input and assistance, where helpful, to this process.

Sincerely,

Kenneth D. Lair