



BOARD OF SUPERVISORS COUNTY OF INYO

P. O. BOX N • INDEPENDENCE, CALIFORNIA 93526
TELEPHONE (760) 878-0373 • FAX (760) 878-2241
e-mail: pgunsolley@inyocounty.us

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January 22, 2013

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



**Re: Description and Comparative Evaluation of Draft Desert Renewable Energy Conservation Plan Alternatives
Docket No. 09-RENEW EO-01**

To Whom It May Concern:

On behalf of the Inyo County Board of Supervisors, thank you for the continued opportunity to participate in development of the Desert Renewable Energy Conservation Plan (DRECP). Inyo County has a long history of providing renewable energy generation for California and the nation, and we are proud that our County possesses the resources necessary for future renewable energy production. The Inyo County Board of Supervisors has consistently expressed its support of appropriate renewable energy development that benefits local communities, and we hope that Inyo County will be able to participate in DRECP implementation. We confirm our continued support of renewable energy development, and we will participate in the siting and development of renewable energy facilities to ensure that our citizens are heard.

We have reviewed the Description and Comparative Evaluation of DRECP Alternatives and offer the following comments.

Mitigation on Public Lands: We are reassured that the DRECP is considering providing mitigation for renewable energy development on public lands, since less than two percent of our County remains in private ownership, and we look forward to this continuing discussion, including approaches to restore degraded public lands classified as Wilderness. We strongly encourage the DRECP to begin mapping areas of Wilderness for potential mitigation to catalyze this dialogue. As indicated in your documentation, over seven million acres within the plan area are already protected lands, and much of this land is in need of enhancement. We believe that this project provides an excellent opportunity to restore scarred lands, eradicate non-native species, support the recovery of endangered species, and undertake other important work that current funding constraints preclude within Death Valley National Park and Wilderness throughout our County.

Impacts to Inyo County: As previously indicated, we remain deeply concerned about potential direct economic impacts from renewable energy development on County services, programs, and infrastructure. We also worry about the DRECP's inconsistencies with the County General Plan and other County policies, including the potential loss of lands for biology-related mitigation; impacts to agricultural and mineral resources, impeded recreational access, and other degradations to multiple uses; impacts to public services, utilities, and infrastructure; demand for housing; and, the society, culture, and economy of the County. In particular, the vast scope of the conservation program contemplated will significantly impact multiple uses on the ever shrinking public lands that accommodate the many varied uses of value to our County, State, and nation (such as recreation, agriculture, mining, and other pursuits); we are gravely concerned that the project will severely reduce or eliminate these uses.

We appreciate that the DRECP has begun analyzing some of these issues, and particularly regarding land use, minerals, and recreational access, but we observe that significant work remains to be undertaken. Specifically, the alternatives analysis does not address agricultural resources and other multiple uses, socioeconomics (and particularly the vast scale of the proposed impacts to multiple uses and further loss of private lands in Inyo County), or public services, infrastructure, or housing. Given the severity of the new designations proposed, we encourage the DRECP to begin considering feasible programmatic mitigation now, such as new/expanded recreation areas and other access improvements, land releases for private development, release of Wilderness Study Areas, infrastructure and service enhancements, and programs to assist

in temporary housing. Due to the unique land ownership pattern here, we request that mitigation in our County be limited to the development that occurs in our County.

Development Focus Areas: We appreciate the DRECP's consideration of the renewable energy overlay that the County proposed several years ago, but note that most of the overlay is not being carried forward in the DRECP. We continue to believe that many of the areas we identified may be appropriate for renewable energy development, based on site specific studies and provided that our concerns discussed above can be addressed, and urge you to reconsider the decision to not identify those portions of Panamint Valley, Death Valley Junction, Rose Valley, and Owens Valley that we did as development focus areas (DFA). We are, however, encouraged that several of the alternatives include DFAs in and around Pearsonville and Trona, similar to our proposal. On the other hand, as we have conveyed to the Bureau of Land Management on multiple occasions, we do not believe that many of the Variance lands identified in the Solar Programmatic Environmental Impact Statement in Inyo County are viable, which we reiterate here.

Mapping: We are concerned about the broad-brushed approach to the mapping, and as we have previously conveyed, we object to new designations that further burden our private lands base. In particular, private and disturbed lands in and around Lone Pine, Cartago, and Olancho are designated moderate biological sensitivity public lands. Obviously, since these areas are private and/or are developed and otherwise highly disturbed, this designation is erroneous, and these areas should instead be mapped as urban or undesignated. Now that these areas have been mapped erroneously, it will be extremely difficult to correct. Other examples of private lands proposed to be burdened with new designations include developed lands in Shoshone and Tecopa, as well as degraded lands in Charleston View and Trona, that are described as having high and moderate biological sensitivity. Also, as we also have previously indicated, we object to identifying lands as subject to the Feinstein bill, as this is a proposal, has not been approved, and is subject to change through the legislative process.

Many of the alternatives propose Areas of Critical Environmental Concern (ACEC) and National Landscape Conservation Service (NLCS) on private lands and disturbed lands in and around Lone Pine, Cartago, Olancho, and Trona. These are highly inappropriate and should be eliminated. We strongly encourage you to coordinate with the City of Los Angeles regarding designating lands managed by the City.

Thank you again for the continuing opportunity to participate in development of the DRECP. If you have any questions, please contact County's Administrative Officer, Kevin Carunchio, at (760) 878-0292 or by email at kcarunchio@inyocounty.us.

Sincerely,



Supervisor Linda Arcularius, Chairperson
Inyo County Board of Supervisor

cc: Kevin Carunchio, CAO
Randy Keller, County Counsel
Joshua Hart, Planning Director
Governor Brown
Secretary Salazar, DOI
Bob Abbey, BLM
Dan Ashe, USFWS
Ren Lohefener, USFWS
Ron Nichols, City of Los Angeles, Department of Water and Power
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Regional Council of Rural Counties
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