

**PLANNING AND COMMUNITY  
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Administrative Operations  
Engineering, Surveying and Permit Services  
Planning and Community Development  
Roads

September 10, 2010

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

File: DRECP

**RE: Comments on Draft Independent Science Advisors Report for the California Desert Renewable Energy Conservation Plan (August 2010)**

Dear Dr. Spencer,

Kern County Planning and Community Development Department appreciates the opportunity to provide comments on the Draft Recommendations of Independent Science Advisors Report for the California Desert Renewable Energy Conservation Plan (DRECP).

The following are comments on the report from the perspective of a local government agency permit holder for the NCCP:

- US. Fish and Wildlife is actively engaged in a revision to the Desert Tortoise Recovery Plan. This effort is well along and includes the August 1, 2008 Draft Revised Recovery Plan for the Mojave Population of the Desert Tortoise. Conclusions presented in the Independent Science Advisors Report do not represent the most recent information and guidance on Desert Tortoise recovery. The report should be revised to include the current extensive reexamination of the 1994 recovery plan.
- Statements in Section 2.20.4 Wind Power are based on outdated and old technology for wind development. As an example, modern turbines do not provide perching and nesting opportunities and no such activities occur in the Tehachapi Wind Resource area on turbines. A review of current data and consultation with industry experts is requested.
- It is unclear how Section 4.2.7 Buffer Reserves with Compatible Land Uses would be implemented or managed given the focus of this NCCP is only renewable energy and not other land uses on private land.

Thank you for the opportunity to participate.

Sincerely,

A handwritten signature in black ink, appearing to read "Lorelei H. Oviatt", is written over a light blue horizontal line.

LORELEI H. OVIATT, AICP, Director  
Planning and Community Development Department