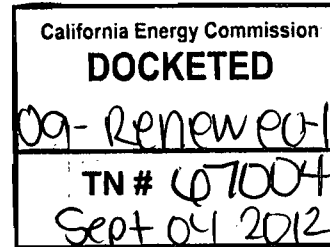


RIVERSIDE COUNTY PLANNING DEPARTMENT

Carolyn Syms Luna
Director

August 30, 2012

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 DRECP Alternatives and Issues of Concern to Riverside County

Dear Mr. Harlow:

Riverside County, having developed and implemented both the Coachella Valley and Western Riverside Multi Species Habitat Conservation Plans (HCP), is a recognized leader in the protection of natural communities and endangered species and understands 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. We appreciate the concerted efforts of the DRECP to share information and seek our input. Although the County supports renewable energy production and acknowledges the positive effects it will have generally, the County has concerns regarding the proposed DRECP.

Riverside County has regularly provided oral input at DRECP meetings, but would like to take this opportunity to discuss concerns on several topics and respond to specific questions posed by DRECP staff. The discussion will focus on the following: the need for a defined implementation strategy, Riverside County's concern regarding the long term community impacts resulting from single industry emphasis planning, the disproportionate impacts of the DRECP to Riverside County, and responses to questions posed by the DRECP.

While the information the DRECP has shared with stakeholders has acknowledged gaps, without a defined implementation plan it is impossible to evaluate or even consider the DRECP. The implementation plan is the foundation of an HCP. It provides structure to the development/conservation strategies and resulting alternatives. It answers critically important questions-- How will consistency with the DRECP be determined? What is the organizational structure for plan implementation? How will land acquisition decisions be made? How will conservation land decisions be made and how will those lands be acquired? What is the anticipated cost of the Plan? What is the funding source for administration, acquisition, management and monitoring? How will the implementing body interface with local government? What provisions will be memorialized to ensure that DRECP funding challenges do not directly or indirectly burden the local jurisdiction?

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Riverside County feels the DRECP should encourage renewable energy production at or near the point of consumption to minimize the commitment of private lands to renewable energy projects, transmission, and associated mitigation, freeing up those lands for uses that may produce more jobs and stimulate diverse economic development. The result of focusing the benefits of an HCP on a specific area to benefit a specific industry may prioritize that particular type of development, whether or not it may benefit the community. An area consumed by one industry poses a risk to that area in the event the technology becomes outdated or the industry falters. We have serious reservations about the wisdom of planning for an area that acknowledges the very real possibility of boom and bust.

The intensity of renewable energy development proposed for Riverside County under any of the DRECP alternatives disproportionately impacts Riverside County in the following ways:

- Added development in Riverside County will enable other areas to meet their mandates at the uncompensated expense to our local jurisdiction.
- Renewable energy does not bring the long term jobs or economic benefit to the community, potentially depriving the community of economic benefit that may be realized by other development on the same footprint.
- While the percentage of private land required for mitigation has not been defined, it is generally accepted that mitigation is required in the area of impact. That being the case, Riverside County will bear a disproportionate burden for mitigation that will economically impact the County by removing private lands from the tax rolls and/or by further restricting public lands that otherwise benefit our community economically, recreationally, and aesthetically.

The DRECP proposed a number of questions specific to Riverside County. While a more detailed response will involve close examination and discussion, we will attempt to provide some general information to assist the DRECP. Response to these questions should not be construed as concurrence with one or any of the proposed alternatives.

Do any of the DFAs conflict with the County's land use plans (e.g., general plan or zoning)? If so, how and where does it conflict? How could the DFA be made more consistent with the County's land use planning policies or goals?

Desert Center

The primary Land Use Designation (LUD) under Alternative #1 is Rural Residential, a low intensity LUD with a minimum 10 acre lot size. This is consistent with the minimum lot size for utility scale solar projects. The General Plan incorporates policies that encourage utility scale solar projects consistent with County Ordinance and Board of Supervisors Policy B-29, where applicable. The Natural Assets zoning classification does not allow solar power plants and, at a minimum, would require a change of zone application.

Chuckwalla

The primary LUD under Alternative #1 is Open Space – Rural, a low intensity LUD with a 20 acre minimum lot size. The General Plan incorporates policies that encourage solar power plant development, but the Zoning Classification is not consistent with County Ordinance to authorize solar facility development.

Blythe

The unincorporated areas of Blythe contain a series of Low Density Residential LUDs that would conflict with all of the alternatives because solar power plants are not authorized in areas designated as Residential. Alternatives #4 and 5 significantly increase the DFA along I-10. While

this area is within a General Plan LUD that would authorize solar power plant development, there are zoning consistency issues.

To make the DFAs more consistent with the County's land use planning, the DFA alternatives should be limited to areas with zoning that would allow solar power plant development.

Should any areas within a DFA be limited to one technology (e.g., a "geothermal only" area) or where one technology should be given a higher priority than another (e.g., an area within which solar PV should be given a higher priority than wind, or vice versa)?

The County has identified specific areas of the County as Wind Energy Zones, which are currently zoned Wind Energy. The most productive of these areas is the San Geronio Pass Wind Energy Policy Area (http://www.rctlma.org/genplan/content/ap2/pap.html#TOC3_20). That said, the most widely allowed technology is photovoltaic followed by solar thermal (tower or trough).

Do any of the biological reserve designs conflict with the County's land use plans? If so, how and where does it conflict? How could the reserve design be made more consistent with the County's land use planning policies or goals?

Generally speaking, the private County lands within the reserve design boundary are various General Plan Open Space LUDs. With the exception of LUD Open Space – Conservation Habitat, all Open Space LUDs have some development potential. The most concentrated area of private land with development potential, albeit limited, appears to be in the area south of I-10 within the Chuckwalla/Bradshaw Trail area. Consistency with the County's land use planning policies will depend on the level of control and the permitted activities required for conservation under the DRECP.

While Riverside County finds the DRECP to be lacking critical components and falling short of benefitting the communities outside of our existing HCPs, we continue to share 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
Riverside County Planning Director