



BOARD OF SUPERVISORS COUNTY OF INYO

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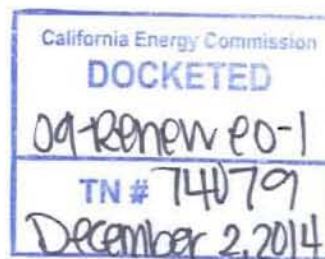
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November 17, 2014

Jim Kenna, Director
California State Office, Bureau of Land Management
2800 Cottage Way, Suite W-1623
Sacramento, CA 95825

Charlton Bonham, Director
California Department of Fish and Wildlife
1416 9th Street, 12th Floor
Sacramento, CA 95814



**Re: Desert Renewable Energy Conservation Plan – Draft Agreement by and between the Bureau of Land Management and the California Department of Fish and Wildlife
Docket No. 09-RENEW EO-01**

Dear Mr. Kenna and Mr. Bonham:

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. We appreciate the opportunity to review the Draft Agreement by and between the Bureau of Land Management (BLM) and the California Department of Fish and Wildlife (CDFW), and provide our input below.

Mitigation within Wilderness and Death Valley National Park: As previously expressed, we are reassured that the DRECP is considering providing mitigation for renewable energy development on public lands, since less than two percent of Inyo County remains in private ownership. We continue to believe that mitigation on public lands in Inyo County should be steered towards existing protected areas, since almost two-thirds of our County has been designated Wilderness. We believe that the DRECP 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 (DVNP) and Wilderness throughout Inyo County. We suggest that the Agreement include specific references to encourage enhancement in Wilderness, and we recommend development of additional agreements with the National Park Service to enhance Wilderness and other lands within the DRECP planning area in DVNP.

Federal Land Policy Management Act: The draft Agreement references the Federal Land Policy Management Act with regards to coordination with the State. We suggest that it also reference coordination with local agencies, including working to harmonize BLM's land use planning with local agency planning.


Multiple Uses: We are pleased that the draft Agreement recognizes the importance of multiple uses on BLM lands. As we have previously conveyed, we are very concerned about the DRECP's potential to displace multiple uses on public lands in Inyo County, particularly from mitigation for project occurring outside of Inyo

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County. We encourage strengthening the Agreement's commitment to maintaining these multiple uses within the context of conservation on the same lands. Please also clarify how conservation on public lands will be implemented temporarily.

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 Richard Pucci, Chairperson
Inyo County Board of Supervisors

cc: County Administrative Officer
County Counsel
Planning Director
Governor Brown
Secretary Jewell, DOI
Neil Kornze, BLM
Steve Nelson, BLM
Carl Symons, BLM
Katrina Symons, BLM
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Kathy Billings, DVNP
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