



Mojave Desert Resource Conservation District

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February 23, 2015

Via E-mail docket@energy.ca.gov and First Class Mail

California Energy Commission

Dockets Office, MS-4

Docket No. (09-RENEW EO-01)

1516 Ninth Street

Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

09-RENEW EO-1

TN # 75096

FEB 23 2015

Re: Draft DRECP CEQA/NEPA document and related Environmental Impact Report/Statement

The Mojave Desert Resource Conservation District (District) is a self-governed Special District operating under Division 9 of the California Public Resources Code. Our boundaries consist of the entire Mojave Desert portion of San Bernardino County. Established in March 1951, the District is the largest of the 3,000 Districts across the nation. Total area that the District covers is 11,500,000 acres (17,969 square miles). The District is approximately half the size of the DRECPs planning area.

The District is committed to the development of a land stewardship ethic that promotes long-term sustainability of the region's rich and diverse natural resource heritage. We, therefore, provide the following services:

Technical Assistance

The purpose of the program is to assist land-users, communities, units of state and local government, and other Federal agencies in planning and implementing conservation systems. The purpose of the conservation systems are to reduce erosion, improve soil and water quality, promote irrigation efficiency, improve and conserve wetlands, enhance fish and wildlife habitat, improve air quality, improve pasture and range condition, reduce upstream flooding, and improve woodlands.

Environmental Quality Incentives Program (EQIP)

The Environmental Quality Incentives Program provides technical, educational, and financial assistance to eligible farmers and ranchers to address soil, water, and related natural resource concerns on their lands in an environmentally beneficial and cost-effective manner. The program provides assistance to farmers and ranchers in complying with Federal, State, and tribal environmental laws, and encourages environmental enhancement. Our programs provide financial incentives to develop habitat for fish and wildlife on private lands. Participants agree to implement a wildlife habitat

development plan and the U.S. Department of Agriculture agrees to provide cost-share assistance for the initial implementation of wildlife habitat development practices.

Conservation Reserve Program (CRP)

The Conservation Reserve Program reduces soil erosion, protects the Nation's ability to produce food and fiber, reduces sedimentation in streams and lakes, improves water quality, establishes wildlife habitat, and enhances forest and wetland resources. It encourages farmers to convert highly erodible cropland or other environmentally sensitive acreage to vegetative cover.

Mojave Desert Resource Conservation and Development (RC&D)- (partner)

The purpose of the Resource Conservation and Development (RC&D) program is to accelerate the conservation, development and utilization of natural resources, improve the general level of economic activity, and to enhance the environment and standard of living in authorized RC&D areas. It improves the capability of State, tribal and local units of government and local nonprofit organizations in rural areas to plan, develop and carry out programs for resource conservation and development.

Soil Survey Program Information

The National Cooperative Soil Survey Program (NCSS) is a partnership led by USDA's Natural Resource Conservation Service (NRCS) of Federal land management agencies, state agricultural experiment stations and state and local units of government that provide soil survey information necessary for understanding, managing, conserving and sustaining the nation's limited soil resources. Soil surveys provide an orderly, on-the-ground, scientific inventory of soil resources. This is the basic information needed to manage soil sustainability. They also provide information needed to protect water quality, wetlands, and wildlife habitat.

As you can see by our services, the District has a history of aiding public agencies and private land-owners in resolving numerous natural resource issues. We have performed numerous natural resource mitigation/compensation projects in our district for government and private entities to offset the impacts of their developments and/or to benefit special status species. Many of these projects are in the form of habitat enhancement and are mostly three to five years in duration. Our work is supported by and in unison with the various regulatory permitting and wildlife agencies.

In its current form, the DRECP's complexity - its multitude of confusing and seemingly internally conflicting programs and mitigation strategies – leaves us with the concern that the DRECP or any one of its numerous programs could trump, dilute, or at least interfere with our current and productive (locally managed) mitigation/compensation projects and natural resource strategy development on private lands.

1. The document fails to address existing conservation practices that are undertaken by our District and our role in implementing future conservation management actions. The documents should both describe our role in Conservation Planning within our District and ensure that our role in the District is maintained and enhanced by undertaking needed management activities should the DRECP be adopted.
2. All proposed management activities as well as their goals and success criteria be clearly described in the dEIR/EIS so there is a clear understanding of the management efforts to be implemented.
3. We strongly support San Bernardino County's DRECP Position Statement. It targets the Plan's elements that would adversely affect our on-going, successful programs. As an example: The full value of Mojave Desert cattle allotments' private lands, grazing rights and permits must remain intact for mitigation/compensation until entirely and voluntarily relinquished – and the multitude of water sources created and maintained by ranchers must remain in use for wildlife that has become dependent upon them.

The DRECP should focus on “Point of Use Distributed Generation” as a means of avoiding the adverse consequences of large-scale industrial RE developments that destroy the various resources we are charged to protect.

Please respond by informing us how the DRECP plans to address our role in the conservation projects to be undertaken by the DRECP in our District. Our respective roles need to be clearly delineated in order to develop a meaningful working relationship. To aid in this effort, we look forward to meeting with you to discuss and define our roles and relationship prior to the adoption of the DRECP. The results of these discussions should be fully documented in the subsequent plan and EIR/EIS.

Please contact us to schedule a meeting.

Sincerely,

Chuck Bell,
President. 760 964 3118 chuckb@sisp.net