



February 23, 2015

Via E-Mail: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

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



Re: DRECP NEPA/CEQA – Comment of Ranchers

Renewable Energy Action Team (“REAT”) Agencies:

The following comments on the Draft Desert Renewable Energy Conservation Plan (“DRECP”) and the September 14, 2014 Draft Environmental Impact Report/Environmental Impact Statement (“EIR/EIS”) are made by The Sauls Company and the four owners of cattle grazing allotments and leases issued by the federal Bureau of Land Management (“BLM”) and the federal National Park Service (“NPS”), comprising more 250,000 acres of land (“Clark Mountain”, “Horsethief Springs”, “Rattlesnake Canyon” and “Round Mountain”, as shown on the diagram attached).

We are very aware of major and diverse complaints and concerns regarding the DRECP effort in general: delays; increased complexity and rigor required in the contemplated permitting of renewable energy projects; less land designated for development of renewable energy resources; greater pressure on private lands already zoned or included in adopted plans for development; a lack of provision for funding and institutional arrangements for plan implementation; and, a general lack of support for it. Underlying these concerns, was the major question: ***what became of the primary focus and purpose of the DRECP to expedite the permitting of renewable energy projects, consistent with appropriate conservation, to meet federal energy objectives, as well as those of the Governor and the State to achieve 50% renewable energy by 2030 and 85% by 2050 (EO S-3-05).***

The single focus of this letter is not on the individual complaints. Rather, it is on making the mitigation of DRECP renewable energy projects more expeditious and less costly (in time and money).

***Our story:*** In December, 2011, with the encouragement of wildlife agency leaders, ranching and environmental organizations, and bi-partisan Congressional support – Senator Feinstein and then Congressman Lewis, Congress passed federal legislation (Pub. L. 112-74) authorizing ranchers in the California Desert to donate their grazing allotments and directing BLM to then “make the land available for mitigation.” Pursuant to this provision, more than 250,000 acres that our ranchers hold under federal grazing leases could be available as mitigation. Yet, it has

742 Summit Drive, Laguna Beach, CA 92651  
714 329-5786

[www.saulsco.com](http://www.saulsco.com)

taken more than three years to see even the first half of the Clark Mountain Allotment set aside as conservation for a Renewable Energy Project.

It now appears that BLM, CFWS and San Bernardino County are interested in exploring the use of these ranch lands as mitigation. However, the DRECP staff has not embraced and explored with any priority this approach as a major component of the DRECP. In fact, the DRECP provides little to no mention of the availability of this alternative for expeditiously mitigating renewable energy projects (and other projects) within the California Desert.

It is important to appreciate the full extent of this resource: the DRECP estimates that Renewable Energy development will require more than 215,000 acres within the 22,000,000 acres of the California Desert<sup>1</sup>. *Of this, less than 185,000 acres are estimated for Solar and Wind energy projects. AND, only a fraction of this acreage is required in San Bernardino County.* Arguably, our four ranches could provide all of the required mitigation for projects in that County and probably for the entire California Desert, and, if not sufficient, there are other ranches that could be relinquished for this purpose. The donations could be made at the outset, or in stages. The San Bernardino County staff is independently and currently exploring with us the development of a Mitigation Credit Pool program to accomplish this (an idea that could be extended to the other counties within the California Desert Areas).

As you can see from the attached diagram, our ranches are well located from a conservation standpoint (generally good grazing lands encompassing both flat lands and slopes, generally adjacent to the National Forest and the Mojave Preserve, as well as within areas calling for a buffer between urban expansion and lands to be conserved). Further, the DRECP has been very focused on using low quality habitat for development areas. ***Therefore, the potential of these ranches to provide high quality habitat as compensatory mitigation for impacts to low quality habitat appears to us to make a great deal of sense, especially if it could be accomplished quickly -- in a single (or staged) effort.***

With such a single effort, our collective accomplishment would implement the Governor/State's and the federal objectives of moving quickly forward with renewable energy. If a fraction of the effort put into the DRECP to date were to be focused on expediting renewable energy projects by pooling the mitigation from these ranches, the idea could not only be contemplated in a revised draft of the DRECP (six months from now), it could be referenced as complete.

We stand ready to discuss this approach further with you and your staff.

Sincerely,



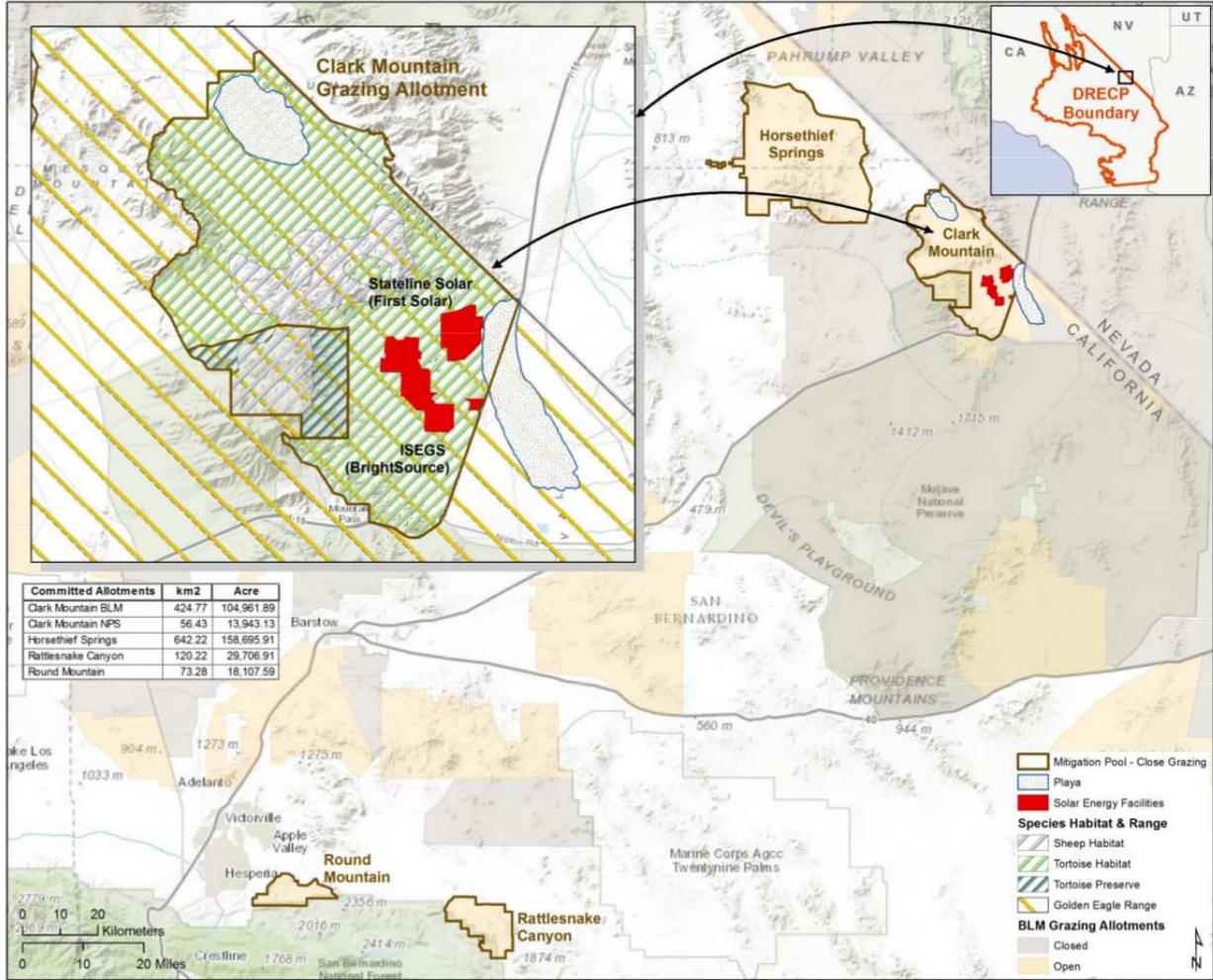
Ed Sauls  
President  
The Sauls Company

cc: Billy Mitchell, Rattlesnake Canyon  
Jon Stone, Round Mountain  
Jay Moon, Clark Mountain  
Ron Kemper, Horsethief Springs

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<sup>1</sup> See Table 1: Revised 2040 Staff Renewable Resource Portfolio, Page 2,  
[http://www.drecp.org/documents/docs/DRECP\\_Acreage\\_Calculator\\_Documentation.pdf](http://www.drecp.org/documents/docs/DRECP_Acreage_Calculator_Documentation.pdf)

# Desert Ranches



Data Sources: ESRI Topographic Basemap Service, CA BLM, DRECP, CEC, USFWS DTRO, CDFG Golden Eagle Range <http://www.dfg.ca.gov/wildlife/nongame/raptors/goldeneagle/>, Playa - USGS Topo, Sheep & Tortoise Habitat - Lindell Marsh  
 Author: L. Benvenuti, Redlands Institute, University of Redlands. Document Path: R:\Projects\DTRO\LindelMarsh\SolarMitigationBank.mxd Date: 3/1/2013