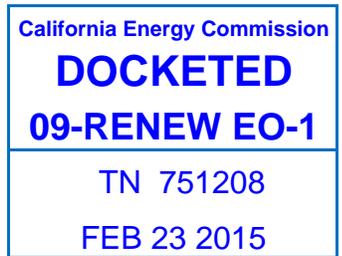




February 23, 2015



VIA ELECTRONIC MAIL

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

Sacramento, CA 95814-5512

RE: Comments to Draft DRECP & EIR/EIS

Dear Sir and/or Madam:

Thank you for the opportunity to provide comments on the draft Desert Renewable Energy Conservation Plan (DRECP) & EIR/EIS. Further, we thank DRECP staff for the opportunity to provide direct input into the cost and feasibility of providing mitigation for renewable energy and transmission projects in the California deserts. Our comments focus on the role of private lands acquisition as a primary tool for achieving mitigation objectives and seek clarification on the selection criteria for the Preferred Conservation Alternative.

Wildlands is a national leader in developing private lands mitigation solutions. Currently, Wildlands operates 35 active wetland mitigation and species conservation banks (Banks) servicing 43 counties in California. In addition to Banks, Wildlands has completed numerous turnkey mitigation projects on behalf of public and private development projects with permits requiring offsite mitigation, including many utility scale solar and wind projects. Our projects have been approved by California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (FWS), U.S. Army Corps of Engineers (USACE), U.S. Bureau of Land Management (BLM), California Public Utilities Commission (CPUC), California Energy Commission (CEC), various Regional Water Quality Control Boards and numerous California Environmental Quality Act lead agencies.

Habitat loss is widely regarded as the primary threat to the survival of wildlife in the United States. Within the DRECP boundary alone many square miles of habitat are being lost or degraded at an alarming rate as a result of development, conversion, incompatible use, and fragmentation. The most effective, and in the long run, most essential tool conservationists have is to remove threats to intact habitat including development and degradation, and manage intact habitat to preserve its wildlife and ecosystem services in-perpetuity. In the California Deserts over the last few years, this has been accomplished to great success through private lands

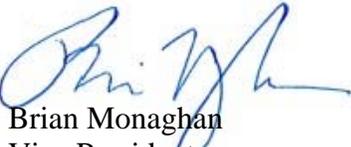
acquisition directed by project mitigation requirements. Private lands acquisition prevents habitat loss and degradation and allows projects to proceed in an environmentally responsible fashion. Private lands acquisition should be a priority as it secures protection for land that is at risk of continued or further degradation. Rather than directing additional funding towards land that is already permanently protected in public ownership, private land alternatives ensure that the preserved property is properly protected and endowed for reasonable and appropriate stewardship, and it relieves taxpayers of current or future obligations associated with the uncertainty of managing, monitoring, and maintaining conservation lands. It is therefore our recommendation that language be inserted into the DRECP that establishes a compensatory mitigation priority that gives first preference to private off-site lands mitigation acquisition.

It is our recommendation that to assure an effective and efficient compensation mitigation program to offset residual, unavoidable impacts, the DRECP mitigation alternatives should include consistent mitigation standards that are required of all forms of mitigation. These standards should, at a minimum, address at least the key elements common among the currently adopted resource agency policies and guidelines. The DRECP should establish high conservation outcome standards consistent with existing agencies guidelines and policies.

In the DRECP Preferred Alternative, there are lands labeled as "Conservation Planning Areas." Conservation Planning Areas appear to be private parcels with high quality habitat that should be considered during conservation planning and considered and/or targeted for permanent conservation and management. The DRECP should consider areas where private parcels are not labeled as Conservation Planning Areas even though they contain high quality habitat and should be targeted for conservation acquisition. One such location is the Piute-Fenner DWMA, north of Interstate 40 and east of Highway 95 in San Bernardino County. Please clarify the selection methodology for categorization of private lands as Conservation Planning Areas, and consider expanding this layer to include additional high quality potential conservation lands.

We thank you for the opportunity to provide comments and look forward to participating further as the process moves ahead. Please feel free to contact me by phone at (916) 435-3555 or by email at bmonaghan@wildlandsinc.com.

Sincerely,



Brian Monaghan
Vice President
Wildlands