

March 17, 2011

Supervisor Bob Buster
County of Riverside
County Administrative Center
4080 Lemon Street, Fifth Floor
Riverside, CA 92501

Subject: Riverside County's Position on the Desert Renewable Energy Conservation Plan

Dear Supervisor Buster:

Thank you for your February 8 letter discussing Riverside County's interests and concerns regarding the Desert Renewable Energy Conservation Plan (DRECP). We are aware of the County's longstanding interests in and contributions to habitat conservation through its existing approved plans and are also appreciative of the County's commitment to participation in the DRECP process through its representative on the Stakeholder Committee. For those reasons we welcome this opportunity to engage with you in a discussion of the opportunities posed by the DRECP and your concerns regarding the DRECP.

Your letter addresses three principal areas of concern that appear to be generally shared by other counties in the DRECP planning area. First, you seek information and assurances regarding the impact of the DRECP on the County's land use programs and controls. Second, you express reservations about the effects of large-scale conservation associated with the DRECP on the local economy and on the County's resources and unique character. Third, you ask specific questions about the number and scale of renewable energy projects and associated mitigation areas that will be sited in Riverside County pursuant to the plan.

On the first of these, the agencies participating in the DRECP would, of course, welcome the counties and other local jurisdictions as full partners in the planning process with the ultimate intent of applying for state and federal incidental take permits for species covered under the plan. That seems the best way for Riverside County, with its recognized experience and expertise in habitat conservation planning, to take a leadership role in designing the plan in a way that is responsive to local conditions and needs. In the next few months decisions will need to be made as to whether counties will:

- a) become full participants with the goal of ultimately receiving state and federal permits under the DRECP;
- b) prefer a plan design that allows local governments to choose at some future point to tier off the plan through a separate permit application; or
- c) seek to advance a plan that combines both approaches.

The state and federal agencies engaged in the DRECP are of the view that if counties become full participants, county needs would most effectively be addressed while accomplishing the conjoined goals of renewable energy development and habitat conservation. We look forward to discussing the options with Riverside County with the goal of identifying the most effective and productive structure for County engagement in the DRECP.

Regarding your concerns about the scale of conservation actions proposed under the plan, it seems reasonably clear that whether there is a habitat conservation plan prepared under the DRECP or not, significant renewable energy development will occur in the Southern California desert in the coming years—on lands managed by the United States Bureau of Land Management, on private lands subject to local government land use authority, or subject to permitting by the California Energy Commission (for thermal power plants of 50 MW or greater). Likewise, whether there is a regional plan or not, if approved, those renewable energy projects would likely be conditioned to contain significant mitigation, including land purchases or other mechanisms. What remains to be seen is whether renewable energy development and associated conservation will be planned regionally. While the DRECP is a work in progress, it seems clear that mechanisms will need to be identified to assure participants that the benefits and burdens of renewable energy development under the plan are not disproportionately distributed, and we look forward to working with the County's representatives to that end.

You also asked several specific questions such as the number of renewable energy projects that would be sited on federal or private lands in Riverside County. One of the primary goals of the DRECP is to identify habitat of low biological value within the planning area that may be most suited for renewable energy infrastructure development. We do not anticipate determining the actual number of projects within the DRECP since that would largely depend on the design of projects by the energy developers. As you may know through the County's participation at DRECP Stakeholder Committee meetings, the DRECP is still early in the planning process. Riverside County's continued participation in the DRECP would assist the DRECP agencies in determining how much suitable land exists for development.

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Additionally, in response to the third bullet of your letter, specific means to accomplish mitigation and conservation objectives will be laid out in the plan. In connection with mitigation, the DRECP process will evaluate options in addition to land set-asides to accomplish mitigation and conservation requirements of the plan.

Finally, you asked that existing approved habitat conservation plans remain "intact" through the DRECP planning process and that the DRECP should encourage renewable energy generation near points of consumption. On the latter, the DRECP will, within the context of the planning and implementation efforts, seek to advance generation near consumption in accordance with state and federal policies. As for leaving existing HCPs "intact" without the addition of new requirements, the DRECP planning area has been revised, as the County requested, to delete the Coachella Valley and Western Riverside Multi Species Habitat Conservation Plans (see enclosed map). The DRECP will neither increase nor decrease the required measures under those plans.

Again, thank you for your letter. We will follow up with Gail Barton and would be pleased to discuss the DRECP with you at your convenience.

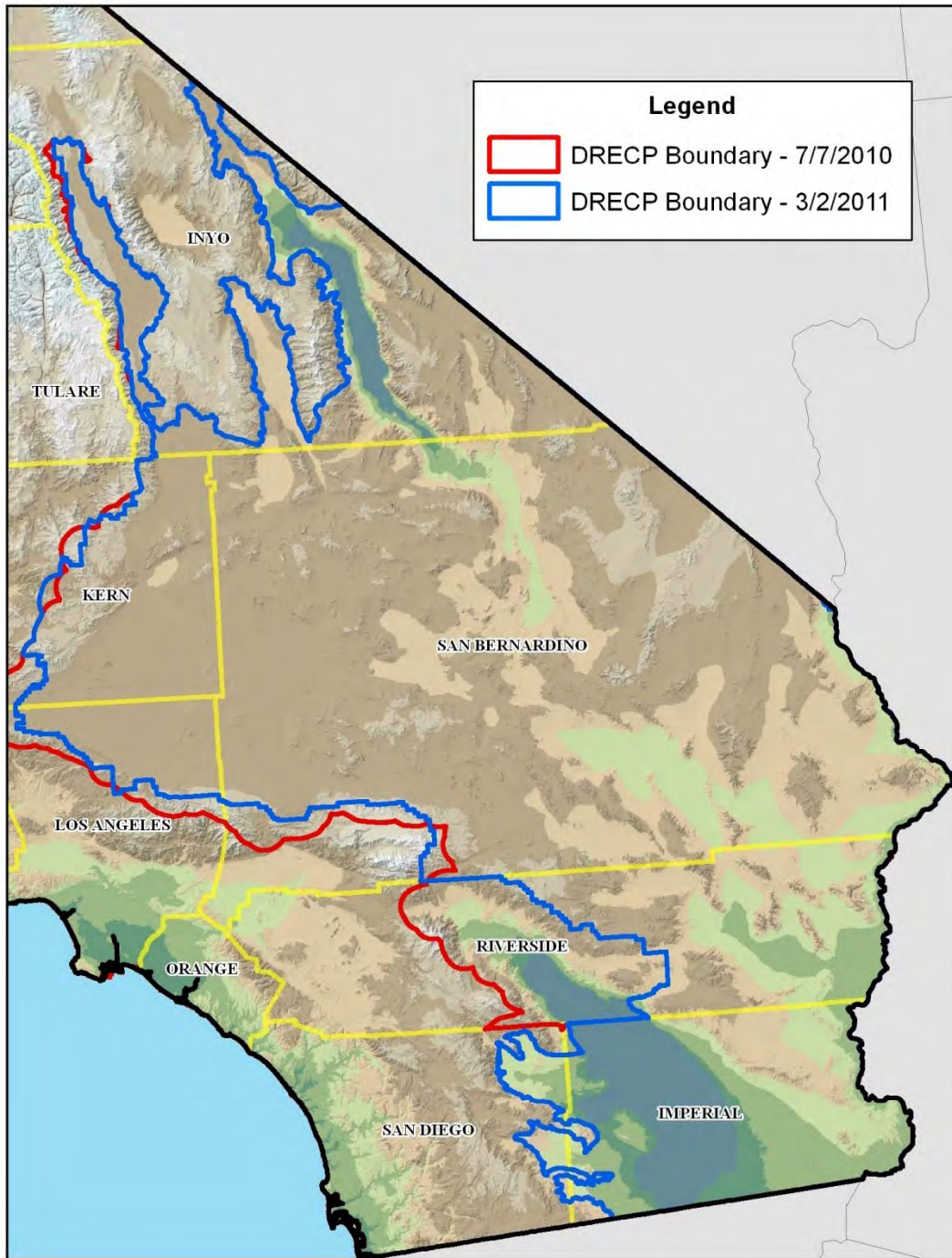
Sincerely,

A handwritten signature in blue ink that reads "David L. Harlow". The signature is fluid and cursive, with a long horizontal line extending to the right.

David L. Harlow
Director, Desert Renewable Energy Conservation Plan

Enclosure: map of revised DRECP area

Cc: Robert Weisenmiller, Chairman, California Energy Commission
Karen Douglas, Commissioner, California Energy Commission
Melissa Jones, Executive Director, California Energy Commission
Michael Valentine, Assistant DRECP Director
Michael Picker, Special Advisor to the Governor for Renewable Energy Facilities
Manal Yamout, Special Advisor to the Governor for Renewable Energy Facilities



Revised DRECP Plan Area

Initial Boundary:
24,553,504 acres
(in red)

Revised
Boundary:
22,587,002 acres
(in blue)

Difference:
1,966,502 acres