February 23, 2015

Via fax: 916-654-4421

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5312

Re: DRECP NEPA/CEQA Docket No. 09-RENEW EO-01
Comments of Majestic Realty Co. re Property in Daggett, California

Dear Commission Staff:

Our affiliate, Daggett Ranch L.L.C., owns approximately 190 contiguous acres of land, located in an
unincorporated part of San Bernardino County, California, commonly known as Daggett, more specifically
shown on Exhibit “A” to this letter (the “Daggett Ranch Land”). For your reference, I have included the San
Bernardino County Assessor Parcel Numbers for the Daggett Ranch Land on Exhibit “B” also attached to this
letter.

The Daggett Ranch Land is included within the study area of the Desert Renewable Energy Conservation Plan
(“DRECP”). In the Draft DRECP Interagency Preferred Alternative (Figure II.3-1), it appears that portions of
the Daggett Ranch Land have been given three different proposed designations:

(1) “Development Focus Area, Preferred Alternative,”
(2) “Impervious and Urban,” and
(3) Undesignated.

I understand that in preparing the DRECP the Commission staff is evaluating an area of over 22 million acres
and, accordingly, may not have focused with granularity on specific parcels such as the Daggett Ranch Land.
By this comment letter, I am providing more detailed information on the uniform characteristics of the
Daggett Ranch Land. We request that the portions of the Daggett Ranch Land that are proposed to be
Undesignated and “Impervious and Urban” should instead be designated as “Development Focus Area,
Preferred Alternative”.

I have attached a letter from our environmental consultant, Environmental & Regulatory Specialists, Inc., in
support of this request.

Sincerely,

MAJESTIC REALTY CO.

[Signature]

Fran Inman
Senior Vice President

Attachment: Exhibit “A” EARSI Letter dated 2/23/2015
Exhibit “B” Assessor Parcel Number
February 23, 2015

Via fax: 916-654-4421

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

re: DRECP NEPA/CEQA Docket No. 09-RENEW EO-01
Analysis in Support of Comments of Majestic Realty

Dear Commission Staff:

Our client, Daggett Ranch LLC, which is controlled by Majestic Realty Co., owns approximately 190 contiguous acres of land, located in an unincorporated part of San Bernardino County, California, commonly known as Daggett, more specifically shown on Exhibit “A” to this letter (the “Daggett Ranch Land”). Our client engaged us to inspect the entirety of the Daggett Ranch Land.

The Daggett Ranch Land is included within the study area of the Desert Renewable Energy Conservation Plan (“DRECP”). In the Draft DRECP Interagency Preferred Alternative (Figure II.3-1), it appears that portions of the Daggett Ranch Land have been given three different proposed designations:

(1) “Development Focus Area, Preferred Alternative,”
(2) “Impervious and Urban,” and
(3) Undesignated.

Based upon our inspection of the Daggett Ranch Land, we conclude that there are no meaningful differences in the environmental attributes as between the Undesignated Daggett Ranch Land and the Daggett Ranch land designated as “Development Focus Area, Preferred Alternative” and “Impervious and Urban”. The lack of distinction includes no apparent differences in the presence/absence of habitat, endangered or sensitive species, blue line stream(s) or other natural resources.

Based upon our review our client is providing this letter in support of its request that the portions of the Daggett Ranch Land that are proposed to be Undesignated and “Impervious and Urban” should instead be designated as “Development Focus Area, Preferred Alternative”.

Sincerely,

David J. Tanner
President

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Environments & Regulatory Specialists, Inc. • 223 62nd Street • Newport Beach • CA 92663
(949) 846-8958 • www.earsi.com • email: dave@earsi.com
EXHIBIT “B”
Daggett Ranch, LLC

San Bernardino County Assessor Parcel Numbers:
0516-251-08
0516-291-03
0516-291-04
0516-291-05
0516-291-06
0516-291-07
0516-301-02
0516-301-03
Response to Comment Letter E48

Majestic Realty Co.
Fran Inman
February 23, 2015

E48-1 Thank you for your comment. Following release of the Draft DRECP and in response to public comments received from a diverse group of stakeholders, the REAT Agencies (i.e., Bureau of Land Management [BLM], U.S. Fish and Wildlife Service [USFWS], California Energy Commission, and California Department of Fish and Wildlife [CDFW]) have adjusted the planning process and are employing a phased approach for the DRECP: one phase addressing BLM lands and another phase addressing nonfederal lands. Under Phase I of the DRECP, the DRECP BLM LUPA and Final EIS addresses land uses, including renewable energy and transmission development, on BLM-administered lands only. See also Volume II which includes revised descriptions and mapping for the range of alternatives considered for the BLM LUPA.