



EDMUND G. BROWN JR., Governor
JOHN LAIRD, Secretary for Natural Resources

March 21, 2018

Mr. Jerry Perez
Bureau of Land Management, California State Director
2800 Cottage Way
Rm W-1623
Sacramento, CA 95825

Dear Director Perez,

This letter accompanies a joint letter submitted by two state agencies within the California Natural Resources Agency in response to the US Bureau of Land Management's public comment period to consider amending the Desert Renewable Energy Conservation Plan (DRECP).

California is opposed to reopening DRECP, which provides for renewable energy production on public lands while also protecting California's Mojave Desert for its biological, cultural, and recreational values. The DRECP was crafted from extensive stakeholder input and public outreach over eight years; reopening the plan will waste time and resources.

While the current plan provides balance in both conservation and development, reopening DRECP will create uncertainty and long delays for new renewable energy projects on public lands and will impose new costs on all parties who compromised on the existing plan. The Bureau of Land Management should instead work proactively with the state of California, local governments, tribes, and stakeholders to resolve issues by implementing the original plan and working to resolve issues collaboratively.

The Desert Renewable Energy Conservation Plan is a major component of California's renewable energy planning efforts. The state of California is eager to work as a collaborative partner during DRECP's implementation.

Sincerely,

A handwritten signature in blue ink that reads 'John Laird'.

John Laird
Secretary for Natural Resources

Attachments

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March 21, 2018

Jerome E. Perez
BLM-California State Director
2800 Cottage Way, Rm W-1623
Sacramento, California 95825
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Dear Mr. Perez,

Thank you for the opportunity to submit comments on the scope of the Bureau of Land Management's proposed review of the Desert Renewable Energy Conservation Plan (DRECP) Land Use Plan Amendment, which amended the California Desert Conservation Area, Bishop Resource Management Plan, and the Bakersfield Resource Management Plan in the Mojave and Colorado/Sonoran Desert regions of California. The DRECP was a multi-year collaborative effort and is an important part of California's effort to meet our greenhouse gas reduction and renewable energy goals. For the reasons stated below, the California Energy Commission and the California Department of Fish and Wildlife oppose the reopening of the DRECP and recommend that the Bureau of Land Management work proactively with the state, local governments, tribal leadership, and interested stakeholders to implement the Plan effectively and resolve issues with implementation as they arise.

As you know, the California Energy Commission and the California Department of Fish and Wildlife worked very closely with the Bureau of Land Management and the U.S. Fish and Wildlife Service in the development of the DRECP over a period of many years. The DRECP reflects hundreds of meetings, thousands of public comments, and deep commitment from all of the public agencies who partnered to develop the Plan. The result was a Plan that provides for renewable energy production from public lands in support of the state's greenhouse gas reduction and renewable energy goals, while also protecting the incredibly rich biological, cultural, recreational, and many other values of the California desert.

We understand that some parties have raised concerns with some of the conservation management actions (CMAs) that apply to renewable energy projects in the development focus areas established through the DRECP. Although the DRECP designed the development focus areas to be attractive for renewable energy projects, it also contemplated the possibility of adjustments. Indeed, the DRECP anticipated the need to allow for CMAs to evolve as better ways of achieving their goals become available. For example, the DRECP establishes a process, described on page 63 of the Record of Decision and page 228 of the Land Use Plan Amendment, that allows for alternative methods to be used to meet the purpose and objectives of particular CMAs with review by the California BLM State Director and consultation with

the U.S. Fish and Wildlife Service, the California Energy Commission, and the California Department of Fish and Wildlife. This is one example of an existing mechanism to address concerns with the DRECP. At this stage, there is no need to reopen the multi-year process and amend the Plan itself.

In lieu of the proposed review and reopening of the DRECP, we recommend the Bureau of Land Management work collaboratively with the U.S. Fish and Wildlife Service, the state, local governments, tribes, and interested stakeholders to address any issues with the CMAs through the above process established in the DRECP. To facilitate this process, our agencies would be willing to convene and lead a working group with stakeholders to identify CMAs that need focused attention and to make recommendations for alternative means to achieve the objectives of those CMAs where appropriate, provided that we have a clear commitment that the Bureau of Land Management will not pursue a reopening of DRECP, and instead will prioritize working with the state to address the highest priority issues with the CMAs through administrative processes.

We appreciate the many years of partnership between our agencies and the Bureau of Land Management, and we hope to work with you, and the many stakeholders in California who put eight years of work into the Plan, to achieve the goals of the DRECP through proactive and collaborative implementation.

Sincerely,



Drew Bohan
Executive Director
California Energy Commission



Charlton H. Bonham
Director
California Department of Fish and Wildlife