

DOCKETED

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Comment Received From: Josh Candelaria

Submitted On: 7/29/2016

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County of San Bernardino Comments Re: RETI 2.0

Additional submitted attachment is included below.



County Administrative Office Governmental & Legislative Affairs

Josh Candelaria
Director

July 29, 2016

Board of Commissioners
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Subj: RETI 2.0 Request for County Comments

Members of the Board:

On behalf of the Board of Supervisors, I thank you for the opportunity to comment on RETI 2.0 via the seven questions submitted to county governments by your staff. I am writing for two reasons: first, to confirm our commitment to responding to the questions in a timely manner; second, to emphasize key concerns County of San Bernardino continues to have both regarding RETI 2.0 and the DRECP.

To guide your ongoing research, I refer you to two important County documents:

- Position Paper on DRECP that we submitted to CEC on February 12, 2015. In this document, the County emphasized five fundamental positions on DRECP compatibility, or lack thereof, with County priorities;
- Board of Supervisors Resolution 2016-20, stating the County's position on the DRECP LUPA.

In brief, the County continues to hold and recommend the following summarized positions related to siting of utility-oriented renewable energy generation facilities (with emphasis added on central points):

1. Protect desert community values and economic development opportunities by:
 - a. Focusing renewable energy development on private land in areas that have marginal economic development potential, have been previously disturbed, or have been contaminated, in addition to federal land in the County
 - b. Focusing mitigation and conservation on federal land in the County
 - c. Minimizing mitigation and conservation on private land in the County
2. Encourage distributed generation that addresses local needs while allowing excess energy to be sold to the grid
3. Maintain County land use authority
4. Retain access to and availability of mineral resources in the County
5. Seek means to improve economic benefits of renewable energy development to the County of San Bernardino

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Per the above-noted Resolution, the County has expressed its general and tentative support for five (5) of the Development Focus Areas (DFAs) identified in the BLM DRECP LUPA (North of Kramer Junction, Trona, Hinkley, El Mirage, and Amboy), recognizing that further County evaluation of all BLM DFAs will continue in the preparation, public review and ultimate adoption of its Renewable Energy Element. Further analysis of these five (5) DFAs may confirm, modify or eliminate the tentative support stated. We have numerous strong concerns about the remaining DFAs in other areas of the County.

Please note that the County has never received any substantive response to these concerns nor has there been any clear effort to revise the DRECP to address the issues raised by the County and its constituents. We respectfully observe that we are somewhat perplexed by the shift from DRECP to RETI 2.0. We emphasize that, in the context of these documents, the County of San Bernardino strongly urges the CEC and its RETI 2.0 affiliates to carefully consider our expressed positions, priorities and concerns in the process of defining future transmission corridors and refinement of DFA locations.

If you have any questions regarding the County's position, please do not hesitate to contact Josh Candelaria, Director of Governmental Affairs at (909) 387-4821 or jcandelaria@sbcountry.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'James Ramos', with a stylized flourish at the end.

JAMES RAMOS
Board of Supervisors Chairman
Third District Supervisor
County of San Bernardino