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September 12, 2011

Mr. Jim Bartel
U.S. Fish and Wildlife Service
6010 Hidden Valley Road
Carlsbad, CA 92001

DOCKET	
09-RENEW WEO-1	
DATE	SEP 12 2011
RECD.	SEP 13 2011

Re: Comment on the scope of issues and alternatives addressed in the Desert Renewable Energy Conservation Plan, Habitat Conservation Plan, and Possible Land Use Amendment, Southern California: Environmental Impact Statement

Dear Mr. Bartel:

The Town of Apple Valley (Town) appreciates this opportunity to provide comments to the U.S. Fish and Wildlife Service on the Notice of Intent for the Desert Renewable Energy Conservation Plan (DRECP), Habitat Conservation Plan (HCP), and Possible Land Use Plan Amendment Environmental Impact Statement (EIS) (collectively referred to herein as the DRECP).

The Town has been working with the US Fish and Wildlife Service-Ventura Office to develop a 285-square mile (170,000 acres) Multi-Species Habitat Conservation Plan (MSHCP) for the Town's limits and Sphere of Influence. The Town is developing the MSHCP to implement its General Plan and achieve its over-arching vision that the Town's quality of life is tied to its rural character, which needs to be preserved and protected for the long-term health of the community.

Because the MSHCP includes both incorporated and County lands, the Town is looking at implementing several conservation strategies that have been identified as important in wider regional planning efforts, including the DRECP. Due to the inclusion of these regional strategies, the Town's MSHCP effort is well supported by the County of San Bernardino (County) and other local stakeholders.

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Recently, County Supervisor Brad Mitzelfelt hosted a meeting for the Town with CEC Commissioner Karen Douglas and key DRECP staff, key County staff, USFWS, and CDFG on August 3, 2011 to discuss the MSHCP and DRECP efforts. At that meeting, the Town shared that its planning effort is based on a regional conservation strategy that protects key linkages in the high desert. At the conclusion of this meeting, it was agreed by all participants that a working group should be formed to discuss how to build on the synergy between the two planning efforts.

Specifically, the MSHCP is looking at protecting two critical regional linkages, the Wild Wash Linkage and the San Bernardino-Granite Mountains Linkage. Both of these linkages pass through the Town's planning area. By identifying and protecting these linkages, the Town's MSHCP integrates well with the goals and objectives of larger conservation planning efforts taking place in the Mojave Desert, including the DRECP.

To preserve the two key regional linkages identified, the Town's MSHCP looks to build on the existing network of Bureau of Land Management (BLM) lands, a total of approximately 55,250 acres, within its planning area. These nearly contiguous blocks of federal lands provide important landscape level connections between the coastal and desert mountains and the Ord-Rodman and Freemont-Kramer Desert Wildlife Management Areas (DWMA). Its value should be recognized by the DRECP planning effort. As you are aware, the DWMA's were established by the West Mojave Plan to protect the desert tortoise and its critical habitat. The West Mojave Plan also notes the future need to provide linkages between the DWMA's.

The Town is requesting that large-scale renewable energy development be excluded from the regional linkages identified by the MSHCP. To date, the DRECP documents do not recognize either of these linkages. It is a priority to both the Town and the region that these linkages are completed.

The Town is committed to ensuring that the MSHCP is consistent with the DRECP's planning effort. We believe that Town's effort to establish the regional linkages identified will not only enhance the DRECP but will increase the region's resiliency to the uncertain effects of Climate Change.

Thank you again for this opportunity to provide comments to the DRECP. We look forward to working with the DRECP Team on this planning effort through the establishment of the working group. For additional information on the Town's MSHCP, please contact Lori Lamson, Assistant Director of Community Development, at (760) 240-7000, extension 7200.



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We look forward to working with the Service on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi Brannon", with a long horizontal line extending to the right from the end of the signature.

Heidi Brannon
Vice President, Director of Projects

cc: Lori Lamson, Assistant Director Community Development

Solution Strategies, Inc. (SSI) is consulting for the Town of Apple Valley on the development of its MSHCP. SSI also represents the Town at the DRECP stakeholder meetings.