



Bristlecone Chapter
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March 26, 2014

Delivered via electronic submission to jhart@inyocounty.us (April 1, 2014)

Board of Supervisors
Inyo County
PO Box N
Independence, California 93526

Re: Inyo County Renewable Energy General Plan Amendment

Dear Inyo County Board of Supervisors,

Please accept and fully consider these comments on the above – referenced Inyo County Renewable Energy General Plan Amendment (REGPA) on behalf of the California Native Plant Society (CNPS) and our local Bristlecone Chapter (hereafter CNPS).

The California Native Plant Society is a non-profit organization working to protect California's native plant heritage and preserve it for future generations. Our nearly 10,000 members professional and volunteers who work to promote native plant conservation through 33 chapters statewide. Our local CNPS Bristlecone Chapter has members from Inyo and Mono counties, as well as throughout California and from countries across the globe. The attraction of these hundreds of members is the vast and beautiful landscapes – montane and desert – where uniquely intriguing, diverse and sensitive vegetation occur. Local denizens and our visitors appreciate the lack of human disturbance that offers the increasingly rare opportunity for spacious solitude and provide safe harbor for our native plant and animal life.

As we transition toward a clean energy future, it is imperative for our future and the future of our wild places and wildlife that we strike a balance between addressing the near term impacts of large scale renewable energy development with the long-term impacts of climate change on our biological diversity, wildlife habitats and natural landscapes. To ensure that the proper balance is achieved, we need smart planning for renewable power that avoids and minimizes adverse impacts on wildlife and the ecological processes necessary to sustain them. These projects should be placed in the least harmful locations near existing

transmission lines and on already disturbed lands with low value to special-status plant and animal species.

While we support renewable energy production and utilization, we do not consider the construction of large-scale projects, and especially solar energy projects proposed on relatively undisturbed lands in the CDCA, to be the only, or even the best way, to achieve our renewable energy goals. Ideally such large scale solar and wind projects should be located on degraded or disturbed land such as degraded and abandoned agricultural fields, industrial sites, and near existing structures rather than on lands containing intact natural biological communities, particularly those that include threatened, endangered or other at-risk species.

The Inyo County REGPA will govern renewable energy development, (solar and wind) for many years. Under Inyo's Renewable Energy General Plan Amendment the County will invite development of 620,000 acres including undisturbed places such as Panamint Valley, Centennial Flat, Death Valley Junction, Deep Springs Valley and portions of Fish Lake Valley. This potential development will incur unprecedented and irreversible mass devastation of our native plant communities and the intricate web of life they support. We, CNPS, strongly urge the County to select the Less-Intensive Alternative, with modifications, thus providing a program for developing solar energy while still protecting our private and public lands.

Inyo County REGPA & CNPS Recommendations

CNPS will be submitting more detailed vegetation-related comments during the DEIS phase of the REGPA. At this time, we provide the following general comments:

- CNPS strongly opposes the destruction/conversion of intact native plant communities, including:
 - **Great Basin Communities**
 - Forests and Woodlands; Bristlecone Pine Forests, Montane and Desert Riparian Forest, Pinyon and Juniper Woodland
 - Scrub; Big Sagebrush Scrub, Carbonate Scrub
 - **Mojave Communities**
 - Forests and Woodlands; White Fir Forest, Joshua Tree Woodland, Desert Riparian
 - Scrub; Creosote Bush Scrub, Saltbush Scrub and Alkali Meadow, Sand Dune Scrub,
 - **Wetlands; Freshwater Spring and Marsh**

Although many of the species that comprise these plant communities are common, their co-occurrences within cohorts can be rare. What's more, in

some proposed REDAs, these plant communities occur at the edge of their range within key ecological transition zones. They represent vital components to the health and sustainability of the ecosystems.

We strongly urge Inyo County to develop an up-to-date vegetation map for Inyo County, and especially for any proposed REDAs. Vegetation mapping according to state standards set by the California Department of Fish and Wildlife will allow Inyo County to identify rare and common natural communities, integrate with recent vegetation mapping developed in other desert areas for the DRECP, and establish a baseline landcover map that will be necessary for a future county Natural Communities Conservation Plan.

- Sensitive, rare, threatened and endangered species must be protected and areas where these species occur must be avoided.
- Detailed floristic studies must be conducted to detect presence/absence of sensitive species. Vast areas of Inyo County have not been surveyed and reliance on spotty, existing data and the California Natural Diversity Data Base (CNDDDB) is an insufficient means of detection. Lands included in the REDAs need floristic surveys conducted by qualified professionals (trained botanists) familiar with Inyo County flora.
- CNPS Bristlecone opposes new transmission corridors due to their inevitable disturbance, spread and introduction of non-native, invasive species, and wide-scale destruction of native plant and animal habitat. We are unaware of existing or planned transmission facilities that could support large-scale wind and solar energy development in the County. We recommend that the REGPA be revised based on existing available transmission, which is most similar to the LDA.
- Invasive species are an existing threat to native vegetation communities within Inyo County - presenting ongoing management challenges. Disturbance, at any scale, promotes further expansion of existing invasive species, as well as introduction of exotic/invasive species. We recommend that the County include detailed, implementable weed management plans that will prevent expansion and introduction of invasive species. Weed management plans need to be designed by qualified, trained specialists.
- In-depth, detailed degraded lands surveys need to be conducted prior to site selection. Surveys need to include large and small areas that have been converted by previous disturbance and non-native species invasion. Site visits need to be included in surveys. The REGPA Degraded Land analysis is insufficient and sparse.
- While aware of the accelerated pace the County faces for the completed REGPA, CNPS urges a slower approach, when feasible, for site selection

that will reduce resource conflicts and loss of irreplaceable native vegetation.

- We recommend that the County adopt a modified Less-Intensive REDA strategy for the REGPA that removes inappropriate lands from the existing Less-Intensive proposal. There should be no projects developed outside the proposed Less – Intensive REDAs. Should Inyo County seek additional energy zones, they must be in areas identified as degraded, with lower impacts in the future, and ensure biological resources are sustainable for future generations. Complete conversion of hundreds of thousands of acres in Inyo County alone is not sustainable.
- We urge the County to integrate its planning with that of the DRECP and use the DRECP biological and conservation reserve design information to help guide its planning process so that the natural communities and at-risk species that exist within Inyo County can be protected and preserved within the larger, connected landscape of the California desert.

The California Native Plant Society looks forward to working in cooperation with Inyo County throughout the REGPA process.

Sincerely,

Julie Anne Hopkins
Bristlecone Chapter Conservation Chair

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