



AGENDA REQUEST FORM
BOARD OF SUPERVISORS
COUNTY OF INYO

For Clerk's Use Only:
AGENDA NUMBER

- Consent Departmental Correspondence Action Public Hearing
 Scheduled Time for Closed Session Informational

FROM: Inyo County Planning Department

FOR THE BOARD MEETING OF: March 29, 2011

SUBJECT: Correspondence Regarding the Solar Energy Development Programmatic Environmental Impact Statement.

DEPARTMENTAL RECOMMENDATION: Authorize the Chairperson to sign the attached correspondence to the Bureau of Land Management (BLM) regarding the Solar Energy Development Programmatic Environmental Impact Statement (PEIS).

SUMMARY DISCUSSION: On March 1, 2011, the Board reviewed a proposed comment letter regarding the BLM's Draft Solar PEIS and directed staff to comment to the BLM to the effect that Inyo County had invoked coordination and expected such coordination.¹ In considering this direction, staff realized that in response to the Board's invocation of coordination in 2009, the BLM included Inyo County in cooperative status regarding the PEIS. Given this status, it would seem that, rather than again invoking coordination, the County should more specifically point out the County plans and policies that conflict with the Draft Solar PEIS and should cite the coordination regulations that require the BLM to achieve consistency between its and the County's planning documents (to the extent possible). This would both recognize that the BLM has (more or less) complied with the initial stage of coordination requiring early involvement and input, and would request that the process move to the more important stage of attempting to achieve consistency between the BLM's proposed plan and the County's plans. The attached comment letter is designed to achieve this result.

ALTERNATIVES:

- Direct changes to the correspondence.
- Return to staff with other direction.

OTHER AGENCY INVOLVEMENT: BLM, Department of Energy, California Energy Commission, other cooperating California agencies

FINANCING: General Planning Department funds are utilized to monitor federal actions affecting the County.

¹ Refer to <http://inyoplanning.org/RenewableNewPage.htm> for the Agenda Request Form from March 1, 2011.

APPROVALS

COUNTY COUNSEL:	AGREEMENTS, CONTRACTS AND ORDINANCES AND CLOSED SESSION AND RELATED ITEMS (Must be reviewed and approved by county counsel prior to submission to the board clerk.) <i>R Miller YES 3-14-11</i>
AUDITOR/CONTROLLER:	ACCOUNTING/FINANCE AND RELATED ITEMS (Must be reviewed and approved by the auditor-controller prior to submission to the board clerk.)
PERSONNEL DIRECTOR:	PERSONNEL AND RELATED ITEMS (Must be reviewed and approved by the director of personnel services prior to submission to the board clerk.)

DEPARTMENT HEAD SIGNATURE:
(Not to be signed until all approvals are received)

Joshua Hart

Date: 3-18-11

Attachments: Draft Correspondence to BLM

March 29, 2011

Draft Solar Energy Programmatic EIS
Argonne National Laboratory
9700 S. Cass Avenue – EVS/240
Argonne, IL 60439

RE: Draft Solar PEIS

To Whom It May Concern:

Inyo County has reviewed the Draft Solar Programmatic Environmental Impact Statement (PEIS) and is supportive of this effort by Bureau of Land Management (BLM) and Department of Energy (DOE) to encourage and streamline solar energy development in California and the southwest.

Inyo County is particularly supportive of statements within the PEIS, such as found in Chapter 2, which note that additions to the proposed Solar Energy Study Areas/Solar Energy Zones (SEZ) are likely to be considered at a future date. Since becoming involved in the PEIS process in July of 2009, Inyo County has consistently requested that the County be included as a site for such Solar Energy Study Areas/SEZs.

As noted in our comment letter of July 28, 2009, there are PEIS-proposed Solar Energy Study Areas immediately adjacent to Inyo County across the California state line in Nevada. The County requests that the extensive BLM lands within its own borders – which contain the same excellent solar development potential as the adjacent Nevada BLM lands – be identified and targeted as Solar Energy Study Areas/SEZs in future planning.

Significantly, while BLM's preferred alternative is the Solar Development Program rather than the SEZ Program, the County notes that this action alternative also excludes lands the County has identified as appropriate for renewable energy development (refer to attached). The County's General Plan encourages the sound development of energy resources on federal lands within the County, and maintaining and expanding access to federal lands for those purposes (Policy Gov 10-1). The County notes that, not only are areas identified by the County as highly appropriate for solar energy development not included as SEZs in the PEIS, but some of those areas are specifically excluded from consideration for solar energy development. At this time, the PEIS is not consistent with the County's plans and policies.

Accordingly, Inyo County request additional and intensified coordination with the BLM to address and resolve the inconsistencies between the PEIS and the Inyo County General Plan and approved policies. In accordance with 43 C.F.R. 1610.3-1(f), Inyo County hereby informs the BLM of the specific inconsistencies between Inyo County plans and policies and the PEIS. The County requests staff-to-staff meetings to address these inconsistencies and, ideally, to resolve them. It is the County's position that the draft PEIS does not adequately identify and address these inconsistencies and the possible resolution of them.

Thank you for your attention. Please contact the County's Administrative Officer, Kevin Carunchio, at (760) 878-0292 at your earliest convenience to arrange for coordination.

Sincerely,

Susan Cash, Chairperson
Inyo County Board of Supervisors

Attachment: Map Comparing PEIS alternatives to Inyo County Renewable Energy General Plan Amendment Overlay

cc: Board of Supervisors, Inyo County
Kevin Carunchio, County CAO
Randy Keller, County Counsel
Joshua Hart, Inyo County Planning Director
Bob Abbey, BLM
Jim Abbot, BLM
Ashley Conrad-Saydah, BLM
Sara Quinn, BLM
Greg Miller, BLM
Linda Resseguie, BLM
Clare Laufenberg Gallardo, California Energy Commission
Regional Council of Rural Counties
California State Association of Counties
National Association of Counties

DRAFT Renewable Energy General Plan Overlay

Solar Development Program Alternative

No Action Alternative

Inyo County Boundary

County Boundaries

Roads



