STATE OF CALIFORNIA GOVERNOR'S MILITARY COUNCIL ASSEMBLYMEMBER ROCKY CHÁVEZ, CHAIR



August 7, 2018

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

Dear Director Perez:

The California Governor's Military Council – comprised of retired flag and general officers, civic leaders, bipartisan state legislators and senior policymakers – identifies important policy issues and advises the Governor and State Legislature on national security and military affairs. We serve to protect and enhance U.S. military and national security operations in California, as well as support our service members, veterans and their families. We also coordinate the state's diverse advocacy efforts to underscore the unique national security value of California's military bases, national security activities, defense technology companies, and workforce to policymakers and the public, ensuring California speaks with a unified voice.

We write to you today to support previous scoping comments made by the California Natural Resources Agency, the California Energy Commission and the California Department of Fish and Wildlife in opposing the reopening of the Desert Renewable Energy Conservation Plan (DRECP). As the Natural Resources Agency indicated in their letter from March 21, 2018, the DRECP successfully "provides for renewable energy production on public lands while also protecting California's Mojave Desert for its biological, cultural, and recreational values." In that same spirit, the Military Council is specifically concerned about the potential risk to critical military facilities and operational areas in the DRECP planning area.

The DRECP is the result of a multi-year collaborative effort between federal, state, local and tribal partners. The result of that effort is a plan that provides an acceptable balance of conservation and development, while providing a clear framework to protect the military's operating environment for testing and training and providing identified areas for the siting of renewable energy to further California's renewable energy and greenhouse gas reduction goals. Reopening the plan will likely impose new, redundant costs, and will require significant time and energy for all parties involved, including your regional Bureau of Land Management (BLM) office in California. Additionally, undergoing a lengthy revision process will create unnecessary uncertainty about how public lands in the desert will be managed, and cause delays for the siting of renewable energy on compatible public land.

The DRECP's established guidelines and framework ensures that conservation and development of renewable energy can co-exist. Changing the carefully negotiated agreement where renewable energy infrastructure should most appropriately be sited may result in encroachment risks on the military's testing and training activities in the Mojave Desert. The DRECP establishes a clear framework that mitigates the siting of incompatible renewable energy to areas that do not threaten military operations. Additionally, while the DRECP created habitat zones for endangered desert species, any set-aside habitat lands outside of military bases that become developed could push threatened species on to military installations, the exact opposite intent of the original plan. This will continue to make military bases refuges of last resort for such species, and could limit the activities that bases can perform as they work around species encroachment, threatening both the health of these important species and military testing and training.

Instead of a reopening of the DRECP, we offer that BLM should work collaboratively with the State of California, local governments, tribes, and the Department of Defense to address specific updates or edits to the implementation of the Plan, while retaining all existing provisions that are focused on protection of the military mission in the desert. We absolutely appreciate the desire to ensure responsible development of our public lands and would be more than willing to assist in this effort. The Council's staff contact for this issue is Gareth Smythe, who can be reached at Gareth.Smythe@OPR.CA.GOV or (916)322-6034.

Sincerely,

Colonel Rocky Chávez, USMC, Retired Chair, Governor's Military Council

Assemblymember, CA-76

Viće Admiral Jody Breckenridge, USCG, Retired

Vice Chair, Governor's Military Council

Scott Morgan

Deputy Director, Governor's Office of

Planning and Research (OPR)

Colonel Deborah Aspling, USAF, Retired Member, Governor's Military Council

Anci Potefan

Major General Alice Astafan, USAF, Retired Member, Governor's Military Council

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Panorea Avdis Director, Governor's Office of Business and Economic Development (GO-Biz) Member, Governor's Military Council

Soullker

Major General David Baldwin The Adjutant General, California Military Department (CMD) Member, Governor's Military Council

Thomas Berard, SES, USAF, Retired Member, Governor's Military Council

Phillip Coyle

Phillip Coyle Member, Governor's Military Council

Joseph A. Czyzyk

Joseph Czyzyk Member, Governor's Military Council

Acades a. Cracche

Charles Giacchi, SES, USN, Retired Member, Governor's Military Council

Lieutenant General Edward Hanlon, Jr., USMC, Retired Member, Governor's Military Council Vin formacini us

Dr. Vito Imbasciani, MD

Secretary, California Department of Veterans Affairs (CalVet)

Member, Governor's Military Council

Jacqui V Li

Assemblymember Jacqui Irwin, (CA-44) Member, Governor's Military Council

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Major General Anthony Jackson, USMC, Retired

Member, Governor's Military Council

James a Johnson

Rear Admiral James Johnson, USN, Retired, MD

Member, Governor's Military Council

Major General Dennis Kenneally, USA, Retired

Member, Governor's Military Council

Senator Janet Nguyen, (CA-34) Member, Governor's Military Council

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Vice Admiral Daniel Oliver, USN, Retired Member, Governor's Military Council Major General Eldon Regua, USA, Retired Member, Governor's Military Council D00-

Senator Richard Roth, (CA-31) Member, Governor's Military Council Tumble to Aleghor

Rear Admiral Kenneth Slaght, USN, Retired Member, Governor's Military Council

Lieutenant General Eugene Tattini, USAF, Retired Member, Governor's Military Council

CC: Ron Tickle, Executive Director, Department of Defense Siting Clearinghouse Rear Admiral Yancy Lindsey, Commander, Navy Region Southwest Brigadier General Kevin J. Killea, Commanding General, Marine Corps Installations, West Brigadier General Roger Turner Jr., Commanding General, MCAGCC Twentynine Palms Brigadier General Carl E. Schaefer, Installation Commander, Edwards Air Force Base Colonel Seth Krummrich, Garrison Commander, Fort Irwin