



File Code: 2720

Date: November 28, 2011

Pattern Energy Group LP
Cleghorn Ridge Wind LLC
Alex Hoffer
Pier 1, Bay 3
San Francisco, CA 94111

Dear Mr. Hoffer:

I have completed the initial screening review of your renewable energy proposal (cover letter dated September 14, 2011 and attached SF-299 'Application for Transportation and Utility Systems and Facilities on Federal Lands' dated September 15, 2011). Your proposal is for a Project Area Site Testing Permit for the development of wind energy facilities along and near Cleghorn Ridge on 2,816 acres of lands administered by the Front Country Ranger District of the San Bernardino National Forest. It includes the installation and operation of additional Meteorological Towers (MET) and Sonic Detection and Ranging (SODAR) units as well as for a variety of planning and resource studies.

Proposals for occupancy and use of National Forest System (NFS) lands are subject to screening criteria according to the regulations established in Title 36 CFR 251.54(e). Based upon my review I have determined that your proposed use does not meet the minimum requirements of initial screening outlined in 36 CFR 251.54(e). However, we are very willing to work with you on any modifications you wish to make to the proposal that would mitigate the concerns identified through the screening process.

The proposal did not meet minimum requirements in the following areas:

- The application requests approval to construct approximately 8 wind turbines, related infrastructure and access roads within the Cajon Inventoried Roadless Area (IRA). You may not be aware that a road may not be constructed or reconstructed in inventoried roadless areas of the National Forest System (36 CFR 294.12), and none of the allowable exceptions in the 2001 Roadless Rule are applicable to this project. We would be glad to work with you in determining if it is feasible to either relocate the infrastructure and access roads outside of the IRA or to eliminate this section from the proposal.
- The application shows the Pacific Crest National Scenic Trail (PCT) intersecting the project area. Because the PCT is a congressionally designated National Scenic Trail, significant relocation of the PCT requires an act of Congress, which is outside our Agency's authority to approve. In addition, Forest Service policy (FSH 2709.11, Section 72.2) does not allow for wind energy proposals to be approved on National Scenic Trails. We would be happy to



work with you in determining if it is feasible to either relocate the infrastructure away from the PCT or eliminate a section of it to mitigate impacts to this trail.

- The application shows a portion of the project area is within the Cleghorn Canyon Research Natural Area (RNA). This RNA was established to protect a diverse array of habitat and animal communities including at least 20 special plant and animal species, including federally listed Threatened, Endangered and Sensitive species. Direction in the San Bernardino National Forest Land Management Plan does not allow for modification of conditions and processes within a RNA. We can work with you to determine if it is feasible to modify the project area to avoid impacts to the RNA.
- The application indicates the need to gate Forest Road 2N47 on both ends of the project area to exclude any public access and to create an exclusive use zone up to one and one-half times the wind turbine tower height wide and approximately 7 miles long. This exclusive use zone is necessary to avoid potential safety hazards to the public associated with wind turbines. Forest Road 2N47 is not only a designated Off Highway Vehicle (OHV) route, but a major access route providing public access to the surrounding forest for a host of multiple use activities. We cannot allow such an exclusive use that would displace ongoing and anticipated multiple use activities. We would be glad to work with you to determine if modifications to the proposal are feasible to mitigate exclusive use concerns.
- In addition to being a major public access route, Forest Road 2N47 also functions as a primary fuelbreak along the top of Cleghorn Ridge. During fire suppression operations it is reinforced with aerial retardant or water drops and is an important piece in the Forest's overall fuelbreak system. It has historically been used to prevent wildfires from burning into San Bernardino, Hesperia, Crestline, Lake Arrowhead and surrounding communities. Fixed wing and rotary aircraft operations in this area would be adversely impacted during a wildfire because of the 'no fly zone' that would be created along the seven mile length of Cleghorn Ridge where the wind turbines would be located. We cannot allow a 'no fly zone' along this ridgetop as it would have a significant adverse effect on fire suppression operations and the ability of the Forest Service to protect life, property and resources. We would be happy to work with you to determine if modifications to mitigate this health and safety concern are feasible.

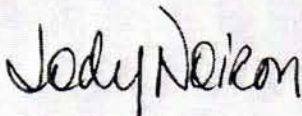
In addition to the concerns identified through the initial screening, and as you are aware from discussions with Forest Service and US Fish and Wildlife Service staff, the proposal raises significant wildlife and habitat concerns that would require close consultation with the US Fish and Wildlife Service. The proposed project area is within the historic home range for California Condors, as well as the current home range for eagle and bat species, other raptors and migratory bird species that are particularly impacted by wind farm operations. Other federally listed threatened, endangered and sensitive species may also be impacted by the proposal. We encourage you to coordinate closely with the US Fish and Wildlife Service should you choose to pursue modifying the proposal to address the concerns identified in the screening process.

Even though my review has found that the current proposal does not meet the minimum requirements of the initial screening criteria, please know that the San Bernardino National Forest supports national renewable energy goals and will gladly consider a modified proposal. As stated

above, I am available to meet with you to go over the issues we identified in this letter and help answer any questions you may have on a modified proposal. I would like to schedule a meeting with you within the next 30 days to ensure we continue timely communication.

I am returning your current application and associated attachments. As you may not be aware, my decision to reject the current application is not subject to administrative appeal (36 CFR 251.86). If you have questions regarding this review or would like to meet with me and/or my staff to discuss this further, please contact Jason Collier, Special Uses Coordinator at (909) 382-2869.

Sincerely,



JODY NOIRON
Forest Supervisor

Attachments

Cc: Front Country District Ranger
Forest Lands and Special Uses Program Director
Regional Forester