



PROTECTING OUR NATURAL AND CULTURAL HERITAGE

August 21, 2013

James G. Kenna
State Director
Bureau of Land Management
California State Office
2800 Cottage Way, Suite W-1623
Sacramento, CA 95825-1886

California Energy Commission
DOCKETED
09-RENEW EO-1
TN 72389
DEC. 04 2013

RE: December, 2012 Draft DRECP

Dear Mr. Kenna:

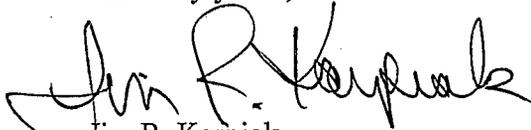
On behalf of the Coachella Valley Mountains Conservancy ("CVMC"), I appreciate the opportunity to offer comments on the draft Desert Renewable Energy Conservation Plan (the "DRECP"). CVMC is a state agency that works to conserve and protect the mountains in and around the Coachella Valley, as well as habitat lands governed by the Coachella Valley Multiple Species Habitat Conservation Plan (the "MSHCP"). Although for the most part, the area covered by the DRECP does not overlap with the territory covered by MSHCP, using the multi-agency planning process represented by the DRECP will promote balance in future development that will retain critical habitat for species protected by federal and state laws around a large swath of California.

The only aspect of the DRECP that directly affects the MSHCP area is the designation of certain existing areas of critical environmental concern ("ACEC") that are partially within the MSHCP area (i.e., the Whitewater Canyon ACEC, the Morongo Canyon ACEC, and the Chuckwalla Bench ACEC) as National Conservation Lands. This will give those areas additional protection from development pursuant to the Omnibus Public Land Management Act of 2009, which is a very positive step that will complement the implementation of the MSHCP.

I would suggest that BLM also consider designating three other ACEC that are partially or wholly covered by the MSHCP as part of the National Conservation Lands system: the Willow Hole/Edom Hill ACEC, Coachella Valley Fringe Toed Lizard ACEC, and the Dos Palmas ACEC. Expanding protection under federal law to each of these areas will assist in the preservation of habitat for numerous species as documented extensively in Article IV of the MSHCP.

If I can provide more information about the ACEC or the MSHCP, please do not hesitate to contact me. Again, thank you for this opportunity to provide input on the DRECP and particularly into which areas in the desert will be designated as National Conservation Lands.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jim R. Karpiak". The signature is fluid and cursive, with a large initial "J" and "K".

Jim R. Karpiak
Executive Director