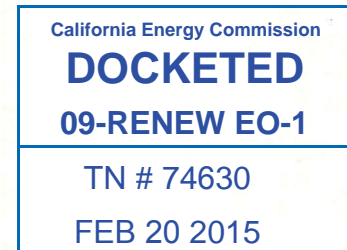


PO Box 63  
Shoshone, CA 92384  
760.852.4339  
**AMARGOSA CONSERVANCY.ORG**

February 18, 2015

California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512



Re: DRECP NEPA/CEQA

To Whom It May Concern:

My name is Patrick Donnelly, the Executive Director of the Amargosa Conservancy, based out of Shoshone. I am also a resident of Shoshone. The Amargosa Conservancy is very concerned about our desert lands being developed with large-scale renewable energy projects, especially since they will have a significant impact on the Amargosa Watershed, and the many unique species and people that make the area their home. We would rather see renewable energy projects being built in urban areas, on rooftops and in industrial areas.

Unfortunately, we recognize that renewable energy companies have been applying, and will continue to apply, to develop more and more of our public desert lands. We therefore appreciate that the Bureau of Land Management, along with the CEC and other agencies, has issued the Desert Renewable Energy Conservation Plan, to attempt to identify areas where energy development in our deserts may be less harmful to plants, wildlife, scenery, recreation and other values, while also identifying places that should not be developed.

Thank you for including many important areas in National Conservation Lands in the Preferred Alternative, such as Afton Canyon, Amargosa River region, Chemehuevi Valley, Chicago Valley, Chuckwalla Bench, Dublin Hills, Indian Pass/Milpitas Wash, Mojave Trails/Route 66, Palen Lake, Panamint Valley, Shadow Valley, Ship Mountains, and Upper McCoy Valley.

The Amargosa Conservancy prefers the number, location, and size of the lands being proposed as National Conservation Lands in Alternative 3. However, that Alternative proposes too many areas being available for renewable energy development.

Assuming that the BLM proceeds with the Preferred Alternative, we would like to draw attention to the many places in our deserts that the Preferred Alternative does not go far enough to protect from renewable energy development. We ask the BLM to improve the Preferred Alternative of the DRECP by including the following additional places, in their entirety, in National Conservation Lands:

- Argos (Rte. 66)
- Ash Hill (Rte. 66)

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- 
- Avawatz Mountains area (including the "Bowling Alley")
  - Big Maria Mountains and surrounding flats
  - Bristol Lake area
  - Cadiz Valley/Iron Mountains
  - California Valley (including Charleston View)
  - Coso Range area
  - Danby Lake area
  - Lower Centennial Flat
  - Malpais Mesa area (including northwestern Talc City Hills, Santa Rosa Flat, Conglomerate Mesa)
  - Mule Mountains
  - Orocopia Mountains area
  - Palen McCoy/Ward Valley/Rice Valley area
  - Pinto Mountains area
  - Ragtown (Rte. 66)
  - Red Mountain
  - Riverside Mountains area
  - Rodman Mountains area
  - Rose Valley/McCloud Flat
  - Sacramento Mountains
  - Silurian Valley
  - Slate Range
  - Sperry Hills/Kingston Range
  - Valley Mountain
  - Vidal
  - Whipple Mountains area

We also ask the BLM to make the following changes to the Preferred Alternative:

- Designate National Conservation Lands as either Visual Resource Management Class I or II, so that approved activities will only cause limited changes to landscape character; and
- Retain Areas of Critical Environmental Concern within National Conservation Lands (instead of removing that special management designation), so that there will be an added layer of protection for more specific values within these areas.

Sincerely,

Patrick Donnelly  
Executive Director

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