

Subject: DRECP NEPA/CEQA comment by Ingrid Crickmore and Robert Ellis February 23, 2015 TN 74880

California Energy Commission Docket Office, Docket Number 09-RENEW EO-01

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We are long-time residents of California. Since 1982 (Ingrid Crickmore) and 1990 (Robert Ellis), we have visited the California Desert regularly, to camp, hike, and enjoy its natural beauty and wildness. We are members of Desert Survivors, a desert conservation and hiking group. We agree with and have signed on to the responses to the DRECP that are being filed by the Center for Biological Diversity, and by Kevin Emmerich and Laura Cunningham of Basin and Range Watch.

In addition to the detailed comments made by CBD and Basin and Range Watch, we wish to point out a specific area of the California Desert that should be removed from any possible threat of development, yet is not so protected in the DRECP. In fact it seems to be suggested as a place for such development, as far as we can tell from this/these very impenetrable document(s).

This indicates to us a glaring and dangerous lack of planning in the formulation of this document.

The area we want to particularly point out as deserving of protection from any kind of large-scale development is known to some as “the Chuckwalla Bench” or “The Bradshaw (trail)”.

This beautiful area has few constituents to advocate for it precisely because it is so wild and so remote that few people other than off-road enthusiasts have been there, yet it is one of the areas most deserving of protection in all of California.

It is one of the richest botanical areas in the California deserts, as well as a Desert Tortoise area, and probably also a haven for other life forms as well. Because of its length and proximity to several mountain ranges, it is a natural wildlife corridor that should be left intact and not disturbed by roads and development.

This area includes but is not limited to the Bradshaw Trail or the Chuckwalla Bench proper: it is a wide east-west swathe bounded on the east by the Salton Sea, on the south by the Chocolate Mt. Gunnery Range, on the north by the crests of a string of ridges just south of Interstate 10 (west-to-east: the Mecca Hills, the Orocopia, Chuckwallah, Little Chuckwallah, and Mule Mts), and on the east by agricultural lands in the Palo Verde mesa.

It is only accessible via rough dirt roads such as the Bradshaw Trail from the Salton Sea area and the Palo Verde mesa, and various even rougher dirt tracks from the north.

Its incredible biological diversity has been noted since at least 1905 (see botanist H.H. Hall’s glowing description of the Chuckwalla Bench area, quoted in Edmond C. Jaeger’s classic botanical treatise *Desert Wild Flowers*, p127 on the discovery in 1905 of the shrub known as Purple bush, *Tetradococcus hallii*).

The BLM has established an ACEC (area of critical environmental concern) over parts of the area, but even this designation apparently no longer “counts” in the rush for energy development, and a wind farm has been proposed within the actual ACEC boundaries.

This whole area has unusual diversity and productivity, including many known rareties and endemics (such as the amazing and gigantic Munz Cholla/ *Cylindropuntia munzii*) and relatively unknown populations of other rare plants (example: *Koeberlinia spinosa*—now documented by plant specimens held at the Jepson Herbarium, U.C. Berkeley, CA). Very newly discovered species (such as the recently described *Cylindropuntia chuckwallensis* and *Euphorbia jaegeri*) have also been found in this area—indicative of more yet to be discovered.

This is one of the many areas that the proposed DRECP would apparently leave open for exploitation for energy, and has already been proposed for wind farms even *within* a BLM ACEC area.

Because of this and other concerns, already noted by the Center for Biological Diversity and Basin and Range Watch, we submit that the DRECP does not adequately address environmental and planning concerns of the California Desert.

Ingrid Crickmore and Robert (Bob) Ellis