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California Energy Commission

DOCKETED

09-RENEW EO-1

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RE: Philip Leitner comments on the Draft EIR/EIS for the DRECP (DRECP NEPA/CEQA)

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I am a wildlife biologist who has conducted field research in the western Mojave Desert for almost 40 years. My main area of interest has been the biology and conservation status of the Mohave ground squirrel (*Xerospermophilus mohavensis*), one of the Covered Species under the DRECP. I am happy to have the opportunity to comment on the Draft EIR/EIS for the DRECP. My comments will focus primarily on the implications of the DRECP and its alternatives for the conservation of the Mohave ground squirrel (MGS). My comments will primarily address issues geographically focused on the West Mojave and Eastern Slopes Ecoregion.

General Comments

The need to allocate land in the California deserts for development of 20,000 MW in renewable energy generating capacity should be re-examined in view of (1) the large potential for renewable energy on abandoned farmland in the San Joaquin Valley and other regions of California and (2) the recent upsurge in distributed generation close to load centers. *The Final EIR/EIS should re-examine the out-dated assumptions behind the goal of locating 20,000 MW of renewable energy in the California deserts.*

Although the land requirement for 20,000 MW can be estimated in various ways, it does not appear to exceed 200,000 acres. Yet none of the alternatives provide less than 1,000,000 acres in DFAs. *The Final EIR/EIS should justify this extreme discrepancy in terms that can be understood by the average citizen.*

The five alternatives provide for DFA acreages ranging from 1,070,00 to 2,473,000. Even the lowest of these is clearly far more than is really needed. If it is possible to provide more than enough land to meet the 20,000 MW under Alternative 1, how can the other alternatives even be considered when they would seriously impact important biological resources that are supposed to be conserved.

Proposed Development Focus Areas and Their Impacts to MGS Conservation

In Appendix C. Biological Goals and Objectives, Section 25 provides detailed Biological Goals and Objectives related to the Mohave ground squirrel. In the Preferred Alternative and in all 4 of

the other Alternatives there are placements of DFAs that will prevent the attainment of the stated MGS Biological Goals and Objectives.

- 1) Rose Valley (Inyo County). In all 5 alternatives, a DFA is proposed for Rose Valley. This region has been recognized as occupied by MGS for over 30 years and is included in the Coso Range-Olancha key population center. The northern portion of the MGS range (including Rose Valley) may be particularly important for survival of the species in the face of climate change. *I believe that no renewable energy development should be permitted in Rose Valley.*
- 2) North of Inyokern along US 395 (Kern County). In the Preferred Alternative and Alternative 2, a DFA is proposed to run N/S roughly parallel to US 395 north of Inyokern. This DFA appears to be overlaid on an area that is an important component of the MGS Conservation Area as defined under the West Mojave Plan. This area was included in the MGS Conservation Area because it provides the only viable connection between the central and northern parts of the MGS range that does not involve military land where conservation protection cannot be guaranteed. Development of renewable energy in this corridor would cut a critical linkage and fragment the range of the species. *I believe that no renewable energy development should be permitted in this DFA.*
- 3) Vicinity of Ridgecrest in Indian Wells Valley (Kern County). Alternatives 1, 3, and 4 propose to locate a DFA in the vicinity of the City of Ridgecrest. The Preferred Alternative and Alternative 2 propose the same area for renewable energy development but also include additional DFA lands to the south of SR 178 between Ridgecrest and Inyokern. The Indian Wells Valley between Ridgecrest and Inyokern is the location of an extensive developed urban barrier to gene flow and dispersal between northern MGS populations and those to the south. Siting renewable energy development in this region will simply make this barrier even more impervious. *I believe that no renewable energy development should be permitted in Indian Wells Valley in the vicinity of Ridgecrest and west to Inyokern.*
- 4) Searles Valley (Kern/Inyo Counties). Alternatives 2, 3, and 4 propose a DFA for Searles Valley. In the case of Alternatives 2 and 3, the DFA appears to be located mainly on the dry lake bed, which of course is not MGS habitat. In Alternative 4, the DFA appears to be located just to the north of the lake bed. Northern Searles Valley is occupied MGS habitat with many occurrence records. Recent trapping and trail camera surveys have shown that this area supports an abundant and widespread MGS population. Siting of renewable energy projects just north of the lake bed could cut off MGS populations in Northern Searles Valley from connections to the south. *I recommend siting of such projects in this area only if it can be demonstrated that genetic and dispersal corridors with adjoining populations to the south of Searles Lake will not be severed.*
- 5) Little Dixie Wash (Kern County). Alternative 2 proposes to locate a DFA from Inyokern southwest along SR 14 through a broad valley known as Little Dixie Wash. This region supports an abundant and widespread MGS population and has been identified as a key population center for the species. Development of renewable energy in this region would clearly make it impossible to attain DRECP Goal MGSQ1: Emphasize conservation in 1) Mohave ground squirrel key population centers. Among other considerations, projections of MGS habitat suitability under future climate change point to this as a critical region for conservation of the species. *I believe that there is no conceivable justification for opening this region to renewable energy development.*

- 6) US 395 between Kramer Junction and Red Mountain (San Bernardino County). Alternative 2 proposes to locate a DFA on both sides of US 395 that would block the Central linkage between MGS populations on EAFB and those to the north in the Fremont Valley/Spangler key population center. In addition, the Preferred Alternative proposes to establish the area west of US 395 here as a Special Analysis Area. Finally, Alternative 4 identifies some BLM lands west of US 395 as DRECP Variance Lands. There is abundant evidence that establishes this area as a high-priority MGS habitat linkage. Since 2011 there have been numerous MGS detections in the area proposed for this DFA, Special Analysis Area, and Variance Lands. Development of renewable energy in this region would clearly make it impossible to attain DRECP Objective MGSQ1.3: Conserve and avoid disturbance of high-priority habitat linkages and corridors... *I believe that no renewable energy development should be permitted in this corridor.*
- 7) Desert Tortoise Research Natural Area (Kern County). Although it is very difficult to be sure, careful examination of the maps presented in Volume II seems to indicate that all alternatives except for Alternative 1 would locate DFAs on some or all of the lands included in the DTRNA and its western and eastern expansion areas. It is very difficult to understand the basis for designating all or part of the DTRNA for renewable energy development. This area has been conserved for decades and is an extremely important conservation area for both desert tortoise and MGS. Conservation and avoidance of disturbance of suitable habitat in the DTRNA is specifically mentioned in DRECP Objective MGSQ1.1. *I believe that there can be no possible justification for proposing renewable energy development on the DTRNA and its western and eastern expansion areas.*
- 8) Linkage from DTRNA to EAFB (Kern County). In the Preferred Alternative and Alternatives 2 and 3, a DFA is proposed that would extend south and east from California City to the northern edge of EAFB. This DFA would effectively block a linkage between key MGS population centers at the DTRNA and on EAFB. Recent data clearly demonstrates that this linkage is occupied by MGS and thus provides genetic connection. *I believe that no renewable energy development should be permitted in this corridor.*
- 9) North of Saddleback Butte (Los Angeles County). The Preferred Alternative and Alternative 4 appear to show a DFA extending north of Saddleback Butte State Park toward the southern boundary of EAFB. This area is included in the MGS Conservation Area under the West Mojave Plan. It was intended to provide a linkage between the MGS population on EAFB and Saddleback Butte, which has supported an MGS population in the past. Placement of a DFA in this linkage with the potential for renewable energy development here would preclude the possibility of re-establishment of an MGS population at Saddleback Butte. *I believe that no renewable energy development should be permitted in this corridor.*

Covered Species Effectiveness Monitoring

Covered species effectiveness monitoring is proposed for a number of species, including the Mohave ground squirrel. Under the Preferred Alternative, for example, range-wide population monitoring and surveys of data gap areas are listed for the Mohave ground squirrel. In Table II.3-17, more detail is provided concerning a number of monitoring approaches. As described, these monitoring efforts would be quite expensive. Similar monitoring efforts were proposed for this species under the BLM's West Mojave Plan, but were never carried out. Without adequate

monitoring, there is no way to determine the effectiveness of proposed conservation measures or to implement Adaptive Management. *The DRECP Final EIR/EIS should clearly specify which monitoring tasks will be accomplished for the Mohave ground squirrel and over what time period. It should also guarantee adequate funding for these activities.*

Conservation Planning Areas

Conservation Planning Areas (CPAs) are intended to provide habitat acreage to compensate for loss of habitat due to renewable energy development. All alternatives present a CPA to the east of California City toward the San Bernardino County border and south to SR 58. All alternatives also present a CPA in eastern Los Angeles County.

The CPA east of California City is made up primarily of private land that has a long history of sheep grazing and in recent decades has been heavily used for ORV recreation. The implication is that this land is to be used as compensation for loss of covered species habitat elsewhere. *Unless the DRECP Final EIR/EIS presents evidence that this land supports covered species and is of suitable quality, it should not be designated as a CPA.*

The CPA in eastern Los Angeles County is also made up primarily of private land that has been used for livestock grazing and has a high cover of invasive plants. *Unless the DRECP Final EIR/EIS presents evidence that this land supports covered species and is of suitable quality, it should not be designated as a CPA.*