

California Energy Commission  
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California Energy Commission

**DOCKETED**

**09-RENEW EO-1**

TN # 75047

FEB 23 2015

Re: DRECP NEPA/CEQA

To Whom It May Concern

I support the Preferred Alternate of DRECP conditional to adding changes listed below:

I am commenting on Desert Renewable Energy Conservation Plan (DRECP) as a manager of significant nonrenewable resources with over 50 years of experience in that field. Nonrenewable resources according to NEPA and CEQA include significant vertebrate paleontologic resources, as well as archaeological and historic resources. These resources require annual inventory, evaluation and management to prevent degradation from natural sources as well as human activities. Consequently, motor assisted and access with passive disturbance must be kept available to allow for best resource management practices by qualified professionals under permit to local and lead agencies.

Federal programs in California for management of nonrenewable resources depend on access to those resources by volunteers, students and support groups. These resource management programs involve high school, college and family groups, and as enjoyable, educational experiences, they reinforce family values and Earth Science concepts. As justification for volunteer support, there is just one BLM paleontologist assigned to manage nonrenewable paleontological resources within the states of California, Arizona and New Mexico. Additionally, we find that wilderness status is discriminatory to youth, seniors and good resource management practices. For the DRECP designations below I recommend that motor assisted access and designated routes become a part of the Special Recreation Management Areas (SRMA) and protected from being listed in the Development Focus (DFA) areas as well as being removed from National Conservation Lands.

The Mojave and Colorado Deserts have a record of vertebrate fossil life that spans more than 400 million years. As a Subgroup member and active participant of the BLM West Mojave (WEMO) Travel Study Plan (2 / 2012 thru 4 / 2014) I and many professional paleontologists provided geographic polygon planning units showing limits of formations containing nonrenewable paleontological resources. With those layers of data came descriptions of past, current and ongoing research and resource management programs that follow NEPA & CEQA guidelines for resource management. This resource management data is available from the BLM Barstow Field Office and must be incorporated into the DRECP process.

The best concept presented in the Desert Renewable Energy Conservation Plan (DRECP) of the Bureau of Land Management (BLM) and California Energy Commission (CEC), along with other agencies is localizing sites of energy production adjacent to areas of urban energy consumption. This reduces impacts elsewhere from remote energy generation and proliferating energy transmission corridors.

However, there appear to be resource management areas and educational opportunities that the DRECP does not adequately protect from renewable energy development. Specifically, there are several resource study sites within Development Focus Areas (DFA) that are not within Special Recreation Management Areas, and should be placed there.

## **San Bernardino County**

**Afton Canyon:** Afton Canyon is located south of I-15 about 30 miles east of Barstow and 25 miles west of Baker. This area contains nonrenewable resources from Ice Age lake sediments and Miocene sedimentary basins. Additionally, the area is an educational field study site for California State University San Bernardino (CSUSB) geology and biology departments, and under study by the United States Geological Survey (USGS). This area, with existing roads and trails should be considered for a Special Recreation Management Area.

**Cady Mountains:** The Cady Mountains are located south of Afton Canyon and north of I-40, between Newberry Springs and Ludlow. These mountains contain the oldest known Tertiary vertebrate fossils in the Mojave Block, and describe sequential development of fossil communities between 25-16 Million years. The area is under study by the USGS and BLM volunteers in paleontology.

**Hector Hills:** A small DFA near the Hector offramp, located in Sections 4, 5, 6, 15, 16, 21 and 22, T8N, R5E, SBBM (Newberry Springs DAG) blocks access to Pisgah Crater Road, Black Butte Road and Hector Road (north). The areas north and south of I-40 in this area, including Sleeping Beauty, Hector Mine and Pisgah Crater are used for education and research by San Bernardino Valley College, California State University San Bernardino, Copper Mountain Community College, Victor Valley Community College and BLM volunteers in conducting paleontological resource management programs.

**Chambless:** The Chambless fossil sequence in the Marble Mountain area is southeast of Chambliss and the National Trails Hwy. Existing roads to the fossil sites are outside the Wilderness area. and must be left open for research access.. These 542 million year old fossils a burst of diverse forms after the cold period named "Snow Ball Earth" are under study by the University of California Riverside Geology Department, San Bernardino Valley College, Copper Mountain Community College, and other institutions across the United States that schedule field trips to this area. Denial of use would have a major impact on national educational research.

**Yermo Area:** The Yermo area within T10N to T11N, R1E to R2E (Newberry Springs DAG), including the Calico Mountains, Yermo and Toomey Hills and Agate Hill contain Miocene sediments with nonrenewable vertebrate and unique invertebrate paleontological resources. These vertebrate fossils and non-vertebrate environmental indicators describe changes of topography from vast wooded areas around lakes to the arid desert of today. The area and its resources are currently under study by the USGS, UC Santa Barbara, CSU Fullerton & Los Angeles and BLM volunteers in paleontological resource management. Please recognize this area as a new SRMA under the DRECP, and maintain access for research and resource management.

**Kramer Junction:** contains early Miocene sediments with the potential for vertebrate fossils that would be the same age as the fossils from the Boron Local Fauna to the west. The area southeast of Kramer Junction (Highway 58 and Highway 395) should remain open for resource management and research.

**Sperry Wash:** in the Dublin Hills, west of Shoshone (Owlshead DAG). Given this area's close proximity to the Amargosa River Valley/Grimshaw SRMA contains a fossilized late Miocene flora of an age not duplicated elsewhere in the Mojave Desert. I request that the SRMA be expanded to include the Sperry Wash and surrounding sediments so that research regarding the ancient flora may continue.

## **Riverside County**

**Hauser Volcanic Area:** Miocene sediments in the Hauser area are located within T 8 ½ S, R 19 E, and T 8 ½ S, R 20 E, (Trigo DAG). These Miocene sediments contain vertebrate fossils and tracks of fossils that need management programs. Additionally, the area is covered by a Memorandum of Understanding (2000) between the U.S. Bureau of Land Management and the California Federation of Mineralogical Societies, Inc. reserving the area for geologic recreation. I ask the BLM to expand this SRMA to include all of the Miocene sediments in an effort to provide continued access for resource management and research.

### **Imperial County**

**Yuha Basin:** Between I-8 and Highway 98 and Dunaway Road Miocene stratigraphy records the intrusion and retreat of marine waters into southern California caused by the opening of the Gulf of California. This catastrophic event is undergoing research by the University of Oregon, USGS, Anza-Borrego Desert State Park paleontologists and BLM volunteers in paleontology. Please consider designating this area as a SRMA so that access for research and resource management may continue.

**Rare Mineral Species:** The Mojave Desert contains two localities that have an extremely high potential for containing mineral species that have never been described by mineralogists. Research and mineralogical studies are ongoing west of Baker, CA in the Soda Mountains and at Otto Mountain. In the last five years, seven (7) minerals new to science have been described. To date, there are seventeen (17) "first occurrences" of new minerals in this portion of the Mojave Desert. Research for new, naturally occurring mineral species must continue, and access routes through the area must remain open. Please consider designating this area as a SRMA so that access for research and resource management may continue.

**In this regard:** the DRECP proposes closing all locatable mineral mines. Locatable mineral exploration and development has less impacts to renewable resources than does development of salable and solid leasable resources. Closure of mineral localities increases the dependency of the United States on extra-continental sources for mineral products.

**Additionally:** In establishing the California Desert Conservation Area (CDCA) within the Federal Land Policy and Management Act of 1976 Congress found that: 'the California desert contains historical, scenic, archeological, environmental, biological, cultural, scientific, educational, recreational, and economic resources that are uniquely located adjacent to an area of large population:"

I would like to request that 'recreation,' 'family values' and 'educational opportunities' be added to the array of values to be emphasized in the future travel management planning.

If recreation is not added to the language of the Final EIR/EIS, it will be contrary to the agency assurance to recreation stakeholders that designated motorized routes would not be closed by DRECP.

Because of the 'more restrictive shall apply' clause regarding NLCA CMA's, the protections for recreational routes of travel in the SRMA's will mean nothing.

I support plans to increase lands managed for research, resource management and recreational emphasis and exclude them from renewable energy development through designation of Special and Extended Recreational Management Areas. I ask that these proposed designations from the Preferred Alternative be carried over to the Final EIR/EIS.

I do not support any additional land for Areas of Critical Environmental Concern (ACEC) or National Conservation Land (NCL) designations. The Bureau of Land Management must carefully consider whether land qualifies for the above designations because of significant criteria of relevance or importance. I believe the hard work exhibited in the Draft DRECP document show that in-depth investigation has been undertaken to find those special areas that warrant increased protection. In my examination I do not find any other or additional areas that warrant inclusion to ACEC or NCL designations.

Thank you for your interest and support of resource management. I look forward to a personal response describing your acceptance of the above resource management concepts and specifics.

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CA BLM WEMO TMA Subgroup (representing nonrenewable resources)

California State University Desert Symposium Convener

BLM Volunteer in Paleontology CA-13-06P

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