RE: Transmission Aspects of the Desert Renewable Energy Conservation Plan

On behalf of Sierra Club, Defenders of Wildlife, and the Natural Resources Defense Council we submit these comments on the transmission aspects of the Desert Renewable Energy Conservation Plan (DRECP, the "Plan"). Our groups each believe in landscape-level planning for conservation and energy, and the value of comprehensive energy and transmission planning to serve multiple objectives—such as providing reliability, integration or other grid benefits, and avoiding harm to natural resources. We have a history of coming together on comments related to conservation, transmission and energy planning and appreciate the chance to do so now. In addition to the significant on-the-ground conservation benefits of the Plan, we also believe this could be an important opportunity to implement transmission and energy planning that serves multiple values.

Transmission Access to DFAs

Our organizations are deeply committed to the success of the DRECP. Together with providing durable conservation in areas of high conservation value, guiding renewable energy development to areas of low conservation value (in this case development focus areas (DFAs)) is imperative for the success of the DRECP. Access to transmission with available capacity is a potential major

benefit of development within a DFA. Conversely, failing to plan for transmission to DFAs could have significant impacts on guiding development to DFAs, and ultimately, the success of the Plan. For these reasons, DFAs should be designed with transmission access in mind--either near transmission with existing capacity, or with the potential to upgrade existing transmission or utilize existing rights-of-way with least environmental impacts.

Other sections of our comments groups' comments recommend the proposed DFAs be more finely analyzed to remove areas with important conservation and habitat value. Following this action to ensure that DFAs are, in fact, lower impact, if it is then determined that, in conformance with the loading order and California Utilities Code Section 454.5(b)(9)(c), transmission improvements within the DRECP area are needed to address resource needs, these improvements should be planned to serve DFAs. Focusing any needed transmission on DFAs will both implement the Plan's energy objectives and avoid guiding development to areas of higher conservation value. Enhanced, early coordination among California's energy agencies is needed to accomplish this goal. We have included various suggestions for how to ensure new transmission serves low-impact DFAs, but key to each of these is coordinated planning that integrates land use, electricity generation and transmission planning.

Transmission should be sustainably sited

We strongly support the Garimendi principles. Existing transmission should be upgraded where technically and economically justifiable, and if construction of new transmission lines is required, expansion of existing rights-of-way should be encouraged when technically and

economically feasible.[1] We also support full consideration of the availability of cost-effective alternatives to transmission, such as energy efficiency measures and distributed generation, [2] and California's Loading Order for prioritizing electricity source. The Loading Order sets a priority list for electricity sources. California's utilities must first employ energy efficiency and conservation to meet customer demand; then energy from renewable sources such as wind, solar and geothermal. Only after all those supplies are exhausted may the utilities purchase power from fossil fuel plants. Avoiding harm to sensitive lands and plant and animal species must also be a key feature of transmission planning, siting and construction.

1. DFAs Must Have Transmission Access.

Transmission access is often the single biggest indicator of a generation project's ability to be competitively priced, be attractive to off-takers, obtain a power purchase agreement and ultimately be constructed. The success of two contrasting solar energy zone competitive leasing processes in the BLM's Solar Energy Program illustrates the importance of developing and refining DFAs with transmission access in mind. Where there was significant commercial interest in developing Nevada's Dry Lake SEZ, which had excellent access to available transmission, there was no commercial interest expressed for the San Luis Valley SEZ in Colorado, which was transmission-constrained.

[1]SB 2431 (Garamendi, Chapter 1457, Statutes of 1988) , also included in California Public Utilities Code §.1005.1

[2]California Public Utilities Code. §.1005.1 requires the California Public Utilities Commission to consider the availability of cost-effective alternatives to transmission, such as energy efficiency measures and distributed generation, when making a decision on a Certificate of Public Convenience and Necessity.

However, this most basic of information on availability of transmission access to DFAs is not provided in the Draft Plan. Without knowing which DFAs have access to transmission with capacity (and how much), which DFAs have access to transmission that could be upgraded with minimal environmental impacts, or what it would take to build new transmission to a DFA, it is not possible to identify the suitability of the DFAs to fulfill the energy objectives of the Plan or to identify the environmental impacts of transmission infrastructure on the conservation objectives of the Plan.

There is also strong commercial development of renewable energy around the California state boundary and this information from other states and regional transmission planning entities should also be interwoven into the DRECP. Transmission rights-of-way do not stop at the border in many areas of the DRECP, and this information should be incorporated into the analysis of DFAs.

Recommendation:

We recommend the DRECP use SCE's publicly available Generation Interconnection Availability Maps to determine where upgrades can build off existing capacity; and obtain maps from LADWP, IID and SDG&E to identify which DFAs have available transmission or could be updated with minimal environmental impacts, and provide this information.

We recommend the DRECP collaborate with WestConnect on their regional plans and review and consider the projects planned to connect to utilities within the DRECP footprint.

We further recommend that a complete transmission analysis be conducted for each DFA to determine what existing transmission lines and poles are available to provide new transmission to each; and what additional new transmission lines and other infrastructure (such as substations) would be required to fully build out each DFA, utilizing all information cited above. Then an effects analysis for each DFA should also be undertaken.

2. The DRECP requires a coordinated Transmission Plan.

Although the Technical Transmission Group (TTG) report included as Appendix K, provides an excellent high-level look at how much acreage might be needed to bring generation from DFAs to load centers, this is not sufficient analysis for the purpose of a programmatic document or for planning or recommending individual upgrades. The TTG compiled the transmission-system additions by defining transmission components to match the renewable generation capacity for each DFA. The transmission additions described herein include connector transmission lines and substations, as well as the collector lines (also known as radial generation tie lines, or gen-tie lines) and delivery lines that would connect and facilitate delivery of renewable energy projects to load centers. We support this effort, but as discussed in greater

detail below, there are major errors with the report and it should not be considered a substitute for a transmission plan.

Appendix K specifically did not look at the environmental constraints or impacts of developing in particular areas. Indeed, the TTG Report uses total acreage as the only factor for determining transmission impacts, and did not include information on existing biological or land use constraints, which is strange given the uniquely large amount of land use and biological information obtained as part of the DRECP. We are concerned that by focusing on acreage only, the full extent of transmission impacts for each alternative was not considered in determining a preferred alternative. These factors have great impact, not only on the conservation objectives of the DRECP, but also on price, which can be a determining factor in transmission planning. Further, the TTG report did not analyze the transmission impacts of Alternative 4 or the No Action Alternative. Failure to consider the impacts of an alternative calls into question the process of determining a proposed alternative.

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Most of the issues addressed in our last comments on the TTG report have not been addressed, as the report has only been updated to address minor changes in the DFAs.[3] The TTG Report assumes new transmission will be needed to serve 14,000 MW (assuming lines serving 7,500 MW are either approved, operational or under construction). This assumes that the total MW out of the DRECP area will be 21,500—over the high end of the current energy assumption of 20,000- 22,000 MW. As Sierra Club notes in their Acreage Calculator analysis, the amount of MW proposed for the Plan Area is artificially high for a variety of reasons, including projections

[3] We incorporate by reference our specific comments on the last TTG report.

regarding energy efficiency and customer side generation that are significantly more regressive than reflected in the state's Climate Plan and historical trends, while projections that increase need for large-scale renewables from the Plan Area are extremely aggressive. Moreover, the Energy Calculator does not account for a large number of existing, planned and permitted projects. Additionally, the TTG Report assumes 1,500 MW from DOD lands *added* to the high end of the DRECP number. This 1,500 MW should not be additive to the total MW assumed out of the Plan Area, which is based on demand.

Moreover, the TTG Report continues to ignore non-wire alternatives despite recent FERC orders and other drivers requiring these to be a key element of current and future transmission planning, including CAISO policies. These options will certainly improve within the term of the Plan. The TTG Report likewise didn't consider high-voltage direct current transmission, which could minimize infrastructure, nor did it consider maximizing the size of transmission lines to allow for adding capacity later.

We are additionally concerned that not all transmission under consideration that can serve the DFAs is accounted for, including existing and proposed infrastructure under both CAISO and non-CAISO balancing authorities. This analysis also did not evaluate the system flows in light of transmission we reasonably expect will be developed in the next 5-10 years—a necessary step to understand the effect this transmission has on transfer capacity from the DFAs-, indeed the report itself included a disclaimer that it is not a substitute for a transmission analysis.[4] Additionally, we are concerned about potential ownership-of-line issues.

[4] Appendix K itself states: The information presented in this report has been developed solely for the purpose of defining approximate impact acreage for transmission that could be associated with the alternatives considered in the

The TTG Report continues to use outdated data and forecasts, retains the assumption that renewable power in the California desert to displace out-of- Plan and out-of-state state fossil fuel resources but does not assume any out-of-state renewable resources will serve the Plan Area. The TTG Report's equal split of displaced fossil generation within the four regions continues to seems highly unlikely, particularly as recent events in Southern California, such as the San Onofre Nuclear Generating Station retirement and replacing proceeding, shows that retirements of major baseload power sources tend to lead to a need for local, rather than remote resources. The TTG Report continues to looks *only* at the 2020 pre-renewable cases prepared by the California Transmission Planning Group (CTPG) to determine the availability of existing transmission capacity. As we noted previously, this report is no longer used by the CAISO and is outdated, yet the TTG did not use more recent reports used by the WECC in its analysis.

We bring these issues up, not to criticize the TTG's work but to emphasize the need for a more robust transmission plan. Coordinated and comprehensive energy planning processes that integrate land use, electricity generation and transmission planning is key to landscape planning efforts such as the DRECP. In recent years, significant public and private investments have been made in landscape-scale planning for energy at the local, state, and federal levels–including the DRECP, but also the BLM Solar Energy Program and multi-state planning efforts. BLM's Solar Energy Program and the DRECP each generated significant data on the conservation values of specific areas, but this information has not been used to inform energy planning-level decisions at the California Public Utilities Commission (CPUC) or project-level decisions by California

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Draft DRECP and Draft EIR/EIS. This effort is not intended to identify specific new transmission lines, identify specific routes, or to replace the utilities' transmission planning processes (Appendix K, page 8).

utilities. Likewise, this information has not been incorporated into the California Independent System Operator (CAISO)'s transmission planning process, which relies on portfolios prepared by the CPUC in its transmission planning. This process heavily weights whether projects have power purchase agreements in approving specific upgrades, leading to reactive transmission planning which is fundamentally misaligned with landscape-level planning.

It is critical that this coordinated planning process begin soon. The CAISO's annual transmission planning process (TPP) addresses energy and reliability needs ten years into the future and analyzes "policy driven," "economic," and "reliability" improvements to address future needs. The CAISO's most recent draft TPP, released after the Draft DRECP, yet again does not mention the DRECP, despite enormous state and federal agency investments in the Plan. In accordance with the CAISO's tariff requirements to consider only final, statutory policy, the only "policy" the CAISO considers is California's 33% RPS requirement. To develop a major new line, it must be first studied in the TPP process, then approved by the CAISO Board of Governors, and then undergo a full CEQA analysis in connection with obtaining a Certificate of Public Convenience and Necessity (CPCN) from the CPUC in a proceeding which by no means guarantees success. All of this must transpire *prior* to actually building the new line, which could itself take multiple years. **Given the long lead -time and high costs of developing new transmission projects, it is therefore critical that the CAISO begin studying transmission access to all the DRECP DFAs now.** This must be done in a comprehensive, comparative way in order to inform the public which upgrades are most cost-effective, most protective of the desert environment, and maximize resources and locations which can avoid fossil fuel development or provide grid benefits, first taking into account and fully analyzing

non-wires alternatives such as demand response, energy efficiency and storage. [5] Without such a thorough transmission analysis, we are concerned that a continued disconnect between the DRECP and California's energy and transmission planning processes will lead to finite customer resources being spent on transmission upgrades or lines which could prioritize other areas within the DRECP (such as conservation areas), or fail to serve areas with the locational or technological benefits most valuable for avoiding dependence on fossil fuels, such as areas nearer load or areas with the potential for solar trough with storage or geothermal. A market-based approach to transmission development in the DRECP area will neither serve the conservation objectives of the DRECP nor prioritize the development of those resources and locations most pivotal for meeting our climate goals and creating a resilient, renewable grid. We have included below a menu of possible approaches for closing this gap. Pivotal to the success of any of these recommendations will be full engagement and cooperation by the CPUC, CAISO and the state's utilities along with the DRECP management team, and appropriate engagement with the public at all steps in the process.

Recommendations:

- **CAISO:**
    - The CAISO should catalyze a special study plan for the DRECP[6] or incorporate information on DFAs into the current TPP. After needed system improvements have been identified through a comprehensive, multi-value process, which looks at energy efficiency, storage and distributed solutions to address resource needs,

[5] http://www.caiso.com/documents/paper-non-conventionalalternatives-2013-2014transmissionplanningprocess.pdf
[6] Any studies should not assume full-build out of the DFAs.

any improvements to serve the DFAs should be classified as "policy lines" by the CAISO.

- Alternately, transmission to the DFAs could also be considered as part of a 50% renewables trajectory study based on Governor Brown's recent announcement.

- **Focused community-based efforts**
  - Transmission lines are often stymied by the "chicken and egg" paradigm of responsive transmission planning, where it is difficult to rationalize a new line without specific generation projects, yet utilities are unwilling to enter into power purchase agreements with generation projects without transmission access. A recent departure from this approach was the Tehachapi Study Group. In response to the desire from multiple parties to access high-quality wind resource in the Tehachapis, CPUC, CAISO, SCE and local agencies and interests worked together to form the Tehachapi Study Group, ultimately getting the Tehachapi Renewable Transmission project built. We recommend that the CAISO, CPUC, environmental groups, DRECP management and local communities form a similar study group to develop least-regrets transmission projects to bring power from low-impact DFAs or portions of a DFAs with local support, which could engender the support of the local community.

- **Prioritized transmission to DFAs that serve multiple values.**
  - It is important to plan now for a mix of renewable technologies throughout the state, along with demand-side resources that can together address our varying seasonal and daily energy needs, without over-procuring natural gas. The DRECP area has

numerous renewable resources (solar PV and thermal, wind and geothermal) available. A number of these resources are unique to the DRECP area, while others, such as PV, are locatable elsewhere in the state, or in the built environment. A more comprehensive analysis by all the energy agencies[7] could better evaluate which are most important to fulfill our statewide energy goals, and when. Once these low-impact, high renewable value locations are identified, transmission should be prioritized to these locations.

- In particular, we recommend that the DRECP work with Imperial County, Imperial Irrigation District, CPUC and CAISO to study and work to facilitate transmission to develop the extensive geothermal resources in Imperial County, including identifying ways this development and the DRECP as a whole, could facilitate much-needed Salton Sea restoration.

- **WECC Case studies**
  - We recommend the DRECP propose a "DRECP DFA transmission" case for analysis by the WECC and CAISO, to evaluate system flows in light of transmission reasonably expected to be developed in the next 5-10 years, and to understand the effect this transmission has on transfer capacity from the DFAs. WECC should analyze broader interconnection-wide impacts, while CAISO should study power flow effects solely influencing the California transmission system. The CAISO should then study the transmission available and planned for these areas and evaluate how much additional capacity is needed. We could understand how the power flows

[7] See, Sierra Club's comments on the DRECP Planning Process for further development of this concept.

change in response to transmission additions and where congestion either occurs or could be alleviated.

- **CPUC prioritization of lines serving low-impact DFAs in CPCN process**
  - We recommend CPUC should give Certificate of Public Convenience and Necessity (CPCN) approval priority to transmission identified in the DRECP as needed to serve DFAs, as required by California Public Utilities Code. §.1005.1. The CPCN process appears to already value zone-based development but it is not clear how this been implemented. Specifically,[8]California Public Utilities Code. §.1005.1. states: (*a) The commission shall issue a decision on an application for a certificate within 18 months of the date of filing of the completed application, when all of the following are true:(1) The application is for a certificate for building or upgrading an electrical transmission line that the commission finds necessary to provide transmission to load centers for electricity generated in a* ***high priority renewable energy zone or*** *is reasonably necessary to facilitate achievement of the renewables portfolio standard."* In our experience, whether a line would serve a renewable energy zone is generally not adequately considered, but this process could be used in the future to prioritize lines serving DFAs, if a line is found necessary.

3. Transmission incentives to DFAs should be clarified and public engaged in planning

Transmission permitting incentives are vague within the document. One public land incentive was BLM's integration of planned transmission corridor improvements developed by the TTG. This group has not been convened in several years, and to our knowledge does not have a role in DRECP implementation doing forward. Moreover, we are concerned that the TTG process was not as open and transparent as it could have been.

Additional public land incentives include the assertion that BLM will commit staff and prioritize projects that provide needed transmission to the DFAs, and will tier transmission NEPA to DRECP documents to the greatest extent practicable, and that these actions will take place through future BLM regulations, rather than the DRECP. Tiering seems particularly concerning, given statements otherwise in the document that the transmission analysis was solely to calculate acreage, and in no way was to be considered a CEQA/NEPA analysis, and the complete lack of on-the-ground environmental impacts analysis of transmission within the Plan. In addition, the plan provides incidental take coverage for long-term operations and maintenance of transmission infrastructure, which provides efficiencies and benefits to transmission owners and operators. Benefits include: improved customer service by avoiding schedule delays associated with acquiring individual, project-by-project permits for threatened and endangered species, ensuring the long-term protection of sensitive species through a process that allows the owner/operator to access and maintain its facilities in a timely manner, a more turnkey process for acquiring mitigation that promotes a holistic view of habitat conservation, since mitigation to compensate for impacts is done on a landscape, rather than parcel-by-parcel, basis., which can be important, as transmission mitigation can often be quite small and having a mechanism to contribute this mitigation to a broader landscape vision is potentially meaningful. Finally, greater

certainty that regulatory requirements could be fulfilled in a more expeditious way could be expected to more easily attract project financing for DFA-related transmission and generation projects. This is a very significant benefit.

Recommendation:

- Our recommendation is that the TTG process be replaced by a more robust transmission planning processes recommended above.
- Given the lack of environmental analysis of transmission improvements in the draft DRECP, draft DRECP will need to be significantly amended to allow for any tiering as there is no site-specific analysis included at this time. Failing that, each transmission improvement will require full CEQA/NEPA analysis.
- We recommend the utilities or other parties developing transmission improvements fund BLM staff time.

4. Existing Corridors must be defined.

The Plan should define "existing corridors." The DRECP repeatedly uses the term, [9] yet "existing corridors" is not defined within the Plan. Thus it is difficult to understand the universe of corridors that can be considered, and to properly identify and analyze the environmental impacts of developing transmission infrastructure. This is essential to both assess any potential transmission impacts on the conservation lands to fulfill the Plan's conservation objectives, and

[9] 11.3-317

to determine whether the DFAs provide access to transmission with available capacity or to transmission which can be upgraded with minimal environmental impacts. The Plan must tie the term "existing" to the date of release of the draft EIR/EIS to remove an ambiguity regarding whether future utility and BLM planning processes could create additional "existing corridors." Again, not understanding this universe makes it difficult to identify and analyze the impacts of developing transmission on both the energy and biological goals and objectives of the Plan.

Recommendation:

- We recommend that the term "existing corridors" be defined as "valid and existing transmission right-of-way as of the date of the release of the DRECP draft EIR/EIS (e.g., September 21, 2014)."

5. Westwide Energy Corridors (WWEC) should be addressed more fully.

The Plan must explain whether the Section 368 corridors currently under review will be considered "existing corridors." As background, as directed by Section 368 of the Energy Policy Act of 2005, BLM and the US Forest Service (USFS) undertook a programmatic environmental impact statement (PEIS) designating right-of-way (ROW) corridors across public lands in eleven Western states in order to streamline and facilitate the siting of linear energy infrastructure (pipelines and transmission lines). However, the original corridor designations, proposed in 2009, did not do enough to connect renewable energy to load centers, did not provide enough opportunity for public input on their construction, and did not adequately analyze potential

impacts on wildlife and the environment.

In response, conservation organizations challenged the designation of the originally proposed corridors. The litigation resulted in a settlement agreement, in which the agencies agreed to review the corridors to address these issues. A number of corridor segments are located in the California desert. There are a number of natural resource and wildlife concerns with specific corridor segments within the Plan area, including impacts to previously undeveloped areas within designated critical habitat, designated conservation areas and priority linkages for the Mojave desert tortoise, priority Mojave ground squirrel habitat and connectivity linkages for Desert bighorn sheep and other wildlife. We incorporate by reference the GIS *Risk Analysis of the West Wide Energy Corridors (WWEC),* prepared by Defenders of Wildlife, May 2014*"* (DOW WWEC Report) which identifies concerns with specific corridor sections in the California desert and includes recommendations for corridor refinements. We support the refinements recommended in this report, and support finding alternatives to these segments recommended for removal.

The BLM should use this opportunity to modify, delete and, if necessary, add additional corridors where suitable. We strongly encourage CA BLM to work with NV BLM on this process, to ensure effective and responsible corridor designation. This will establish an important foundation for the Regional Periodic Review of corridor designations.

The DRECP must explain whether the Westwide Energy Corridors will be considered "existing corridors."

Recommendation:

- We recommend that the BLM LUPA modify the Section 368 Corridors of Concern consistent with BLM's wildlife policies, the DRECP's biological goals and objectives and the goal of serving DFAs by refining the WWEC Corridors as outlined in the DOW WWEC Report.

6. Transmission must be sustainably sited and impacts properly mitigated.

The DRECP preferred alternative allows transmission within existing corridors within all categories of BLM managed land other than wilderness or wilderness study areas[10] including Areas of Critical Environmental Concern (ACECs) and NLCS units. Most of these designations were created to conserve specific natural resource values which are key to achieving the biological goals and objectives and conservation strategy of the Plan. It is not clear if any attention has been paid to how potential transmission within existing corridors intersects and potentially conflicts with the conservation values and biological goals and objectives of the Plan. Further analysis of impacts of potential transmission is an essential element that must be included in the EIR/EIS.

Transmission within NLCS units raises additional concerns regarding consistency with the NLCS designating Act. As specified in the Omnibus Public Land Management Act of 2009,[11] the NLCS was established to "*conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations*." The Act goes on to require that NLCS units be managed "*in a manner that protects*

[10] 11.3-317
[11] 16 U.S.C. 7202

the values for which the components of the system were designated".[12] It is not clear that any analysis was conducted to determine whether development in specific energy corridors would protect the values for which any specific NLCS unit was designated.

Additionally, BLM's own policy guidance states: *"(T)o the greatest extent possible, subject to applicable law, the BLM should through land use planning and project-level processes and decisions, avoid designating or* ***authorizing use*** *of transportation or utility corridors within Monuments and NCAs. To that end, and consistent with applicable law, when developing or revising land use plans for Monuments and NCAs, the BLM will consider: designating the Monument or NCA as an exclusion or avoidance area;…."*[13] We support consistency across NLCS units and with BLM policy, meaning in this case that these lands should not include transmission as a default measure.

Recommendations:

- We recommend that the DRECP adopt the approach in Alternative 1 which "*excludes all existing transmission corridors from National Conservation Lands."* [14] Within NLCS units, "*only site authorizations that protect or enhance conservation values, such as those granted as compensatory mitigation for Covered Activities within DFAs or for habitat restoration, would be allowed. National Conservation Lands would be avoidance areas for all other linear ROWs unless the use is clearly compatible with the protection of National*

[12] BLM Manual 6100-National Landscape Conservation System

[13] BLM Manual 6100-National Landscape Conservation System

[14] II.4-33

Conservation Lands values."[15] Unlike Alternative 4, this approach would not completely foreclose development of new transmission within NLCS units, but would require any future linear ROW to be compatible with NLCS values, consistent with BLM policy.

- We recommend the DRECP to define as part of the NLCS system, *in addition to* the wilderness, wilderness study areas, national monuments, wild and scenic river segments, and national scenic or historic trails specifically designated in subsection (b)(1) of the 2009 Omnibus Act, as additional lands which are "managed for conservation purposes" in the 2009 Omnibus Act those lands recommended in comments from Defenders of Wildlife et al,[16] and accordingly treat these lands as per the Approach in Alternative 1.

6. Transmission conservation management actions (CMAs) should be enhanced based on conservation values impacted.

Conservation management actions do not appear to vary based on the designation of the lands impacted; rather, mitigation ratios are constant regardless of the type of lands impacted. This amounts to a failure to take a "hard look" at impacts in any kind of site-specific (or even generic, based on designation) way. Additionally, each of the action alternatives in the DRECP includes identical transmission Avoidance and Minimization CMAs to those listed in the Preferred Alternative, making it difficult to compare the impacts between alternatives.

[15] II.4-34

[16] These lands include all designated ACECs within the CDCA, all designated Desert Wildlife Management Areas ("DWMAs") within the CDCA,. all BLM designated Conservation Areas for imperiled plants and wildlife in the CDCA, all Wildlife Habitat Management Areas designated in the CDCA, all wetland and riparian areas designated in the CDCA in 2009, Research Natural Areas, National Natural Landmarks, National Register of Historic Places lands, Lands with Wilderness Characteristics and Limited Use Class Lands

Recommendation: We recommend the DRECP provide a range of conservation and management actions, including increased compensation ratios for impacts within NLCS and other units with protective designations, based on BLM policies, for transmission impacts.

We thank you for the opportunity to comment on this valuable process.

Sincerely,

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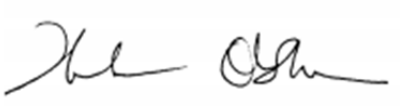

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