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California Energy Commission

DOCKETED

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DRECP Comments

Transition Habitat Conservancy is a 501 (c) (3) landtrust operating in the West Mojave Desert. In the last 3 years we have acquired 6,673 acres of conservation lands in the West Mojave Desert. Our conservation projects should not appear on the DRECP maps as DFA's. The GIS layers for our already protected lands have been sent to Mr. Howard at DUDEK. We are purchasing private lands for Conservation.

Conservation Area #1 where Transition Habitat Conservancy is actively acquiring lands-Pinon Hills, CA From Sheep Creek Wash to Mescal Creek, south of Highway 138 to the US Forest Service Lands in the south. This is being funded by Department of Fish and Wildlife, Wildlife Conservation Board and National Fish and Wildlife Service. You should remove this area from the DFA and put it on the maps as a Conservation Planning Area.

Conservation Area #2 West Antelope Valley where Transition Habitat Conservancy is actively acquiring lands, in Lanacaster, CA

Our active conservation lands acquisition project goes from The State Parks Poppy Reserve to Ripley's Woodland State Park as northern boundaries. All lands adjacent to the Poppy Reserve to the West, all lands south of Landcaster Road to the US Forest Service Boundary, and all the way to Three Points Road on the East. Please remove DFA's from this active Conservation Project.

Conservation Area #3 includes private lands within the Fremont-Kramer Desert Wildlife Management Area as well as the Superior-Cronese Desert Wildlife Manamgent Area which are Desert Tortoise Recovery Units 1 and 2 in the USFWS Recovery Plan. Every other section is BLM owned lands and we are purchasing the private land inholdings in this area. A great deal of SB 34 Advanced Mitigation Funds were spent in this area as part of the DRECP. These designated tortoise recovery areas should be receiving the highest possible management designations and implementation funding.

Other Comments:

The plan should include a mechanism, whereby as the DFA reaches the proposed percentage of development (I believe it was 8% in L.A. county) the plan would recommend a moratorium on further development until it is determined through a public process that more development would not adversely affect habitat in the DFA.

DRECP Comment period should be extended. This is an enormous document to digest.

Distributed Rooftop and other innovative distributed energy should be the main focus before we add additional large utility scale projects to the desert. The problems caused by transmission to the desert

tortoise have been largely under-recognized by the DRECP. The recent 2015 Tortoise Symposium discussed this in great detail and should be a place to gather information that informs the DRECP Plan.

The Independent Science Advisory recommendations should be reviewed and followed.

In Rural Communities such as Phelan, Oak Hills, Llano, Kings Canyon, Pearblossom, Three Points, etc. the Community Plans that are included in the General Plans for LA and San Bernardino Counties should be respected. Our Community Plans place very high priority on maintaining Rural Character and these areas should not include any industrial scale development.

I can be reached at anytime to supply additional information and maps of our areas, although DFW and DUDEK have them.

Sincerely Yours,

Jill Bays

President

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