

NATIONAL PARKS CONSERVATION ASSOCIATION

Protecting Parks for Future Generations

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California Energy Commission
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National Parks Conservation Association's (NPCA) comments on the DFA's

DRECP decision makers,

NPCA, the leading voice for the national parks, appreciates the opportunity to deliver public comments for the Desert Renewable Energy Conservation Plan (DRECP) and the development focus areas (DFA) presented at the April 25-26 meeting in Ontario. NPCA is a national non-profit, well-represented in the California Desert, dedicated to protecting and enhancing the rich natural, cultural, and historic resources of the National Park Units. We support and represent a membership and advocacy of over 600,000 individuals, including more than 99,000 Californians. We continue to work in partnership with the administration, federal and state agencies, communities, and elected officials to encourage a thoughtful approach to how and where we site industrial-scale renewable energy projects in the California desert. We have worked to connect California desert residents and decision makers to the DRECP process, and have participated in DRECP meetings throughout the planning process.

NPCA recognizes that the DRECP, in some scenarios, is focusing development zones closer to desert communities and in areas determined to have lower resource conflict. NPCA believes that a phased development approach can meet immediate development needs using disturbed public and private lands while incorporating a flexible adaptive management framework. This phased development should include a specific plan to meet our 2020 renewable energy portfolio standards, and a specific plan to increase that portfolio beyond state-mandated requirements. A more thoughtful and transparent approach will allow us to learn and grow without the negative costs and conflict we have experienced from impacts to land, species, and taxpayers as we pursue renewable energy development.

We also recognize that the Mojave and Colorado deserts have not been fully studied nor thoroughly mapped. All decisions that we make in relation to developing industrial-scale renewable energy can affect natural, cultural, and economic resources. Renewable energy projects can also have short and long term impacts to wildlife connectivity,



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recreational access, ecosystem resiliency, and species' ranges. Our decisions must consider these points and represent our concerns about resources; add to our knowledge of this landscape and recognize the permanent impacts associated with the industrialization of arid lands. We must choose the right places because desert lands heal on a geological timetable, and we have the opportunity to utilize lands that have already been significantly altered.

NPCA encourages DRECP decision makers to oppose or modify DFA alternatives 4, 5, and 6 due to their negative impacts to National Parks, designated wilderness, wildlife connectivity, water resources, sensitive and listed species and local economies.

Therefore, we ask that you consider the following issues in your decision to establish DFAs:

- Consistency with decisions made in Solar PEIS-- Areas excluded from solar zones and variance lands within the Solar PEIS process should be similarly excluded from consideration within the DRECP. One example of this is Development Scenario 6 identifying over 60,000 acres of lands east of Joshua Tree National Park (along Route 177) within the DFA. This scenario includes lands that were excluded from development within the Solar PEIS. Any lands excluded from SEZ or variance in the FEIS of the PEIS should automatically be removed from the DRECP.
- Consistency with Cattelus lands and the California Desert Protection Act of 2011 (CDPA)-- NPCA continues to advocate for protection of the Cattelus lands donated to conservation by the Wildlands Conservancy. We also support the future protections proposed within the CDPA. Alternatives 5 and 6 appear to conflict with both Cattelus and CDPA south of Interstate 40 and east/southeast of the Cady Mountains between Interstates 15 and 40.
- Protection of Mojave River water that terminates in Soda Dry Lake and adjacent/connected springs and seeps-- The Daggett triangle has been identified as a low-conflict, development priority due to the fallowed agricultural land and other private and public lands with intensive land usages. Our initial concern with development here is associated with Mojave River water and impacts to Mojave National Preserve. The Mojave River flows above the surface at the Mojave Narrows, Camp Cady, Afton Canyon, and at Soda Dry Lake (within Mojave National Preserve). Wherever it flows above ground, it creates important wetlands, providing a home to sensitive flora and fauna such as Tui Chub, Western Pond Turtle, and others. We recommend that water usage be scrutinized



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- in any proposed project, and that preference be given to projects that limit usage of, protect, and/or retire water in this region.
- Protection of water in Death Valley Junction, and sources feeding Devil's Hole, Ash Meadows, and the Wild and Scenic Amargosa River-- DFA 6 includes lands that are connected to these water sources. Ash Meadows is the largest wetland in the Mojave and Devil's Hole is located within Ash Meadows and is an exclave owned and managed by Death Valley National Park. The Amargosa River is the only designated Wild and Scenic River in California's Mojave Desert, within the DRECP planning area and it terminates in Death Valley National Park. These wetlands and riparian corridors are home to rare, sensitive, federally threatened and endangered and endemic species found nowhere else. Protection of water resources in this region is critical to natural communities and for human communities. Several communities, such as Shoshone and Tecopa have become gateway communities serving visitors to Death Valley National Park. These communities have a financial interest in protecting their water resources and their pristine views.
 - Inclusion of existing connectivity and wildlife linkage data-- The Morongo Basin Open Spaces Group and South Coast Wildlands connectivity data should be considered in DFA development. Key areas of concern include connectivity between Joshua Tree National Park and the Palen-McCoy Wilderness; between Joshua Tree National Park and the Twentynine Palms Air Ground Combat Center; between Mojave National Preserve and connected designated and proposed Wilderness Areas and Wilderness Study Areas; and between Death Valley National Park and connected wilderness and river corridors to the south and east.
 - Removal of high conflict projects in remote, pristine locations-- The Silurian Valley Wind Project along SR 127 (north of Baker) is proposed in DFA 6. This project interrupts an important and unique viewshed. Disturbance of this scenic landscape between Mojave National Preserve and Death Valley National Park could harm local communities who serve destination tourists, as well as fragmenting wildlife movement corridors between the two National Parks and adjacent Wilderness. Concern has been raised from local communities about this project. This area is currently being considered as an ACEC by the BLM.
 - Honoring Administration initiatives through DRECP planning-- The Obama Administration and the DOI recently released an initiative to drive tourism to the United States. The California desert and its National Parks, Wilderness, and other public lands are important destinations for national and international visitors, especially from Northern Europe. We must analyze the impacts to tourism created by siting projects adjacent to our protected lands. Comments citing the need to gain a deeper understanding of the full-range of impacts, including economic



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- impacts, were made during the comment period provided during the April 26th meeting.
- Better protecting cultural resources and First Nations history-- Increased coordination with tribes, dedicated, deeper work on cultural resource identification and avoidance, including predictive modeling and avoidance of high-conflict cultural resources is needed.
 - Responsible roll-out of DRECP-- Opportunities for public comment must be present within the California desert. This is simply good policy, but it also provides opportunities for underrepresented and socio-economically disadvantaged communities to share their voices on issues that will affect them, their communities, and their backyards. We recommend that meetings be held in Barstow, the Morongo Basin (Yucca Valley, Twentynine Palms, Joshua Tree, Morongo Valley) and/or Palm Springs, Imperial County, and in the West Mojave (Lancaster or Palmdale). These meetings should be held as workshops to inform the public about the purpose and progress of the DRECP and DFAs, Meetings should include a public scoping period for individuals to share their concerns and suggestions.

We appreciate the continued opportunity to voice our concerns.

Respectfully,



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National Parks Conservation Association



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