

Submitted via email to docket@energy.state.ca.us



CALIFORNIA
WILDERNESS
COALITION

The Voice for Wild California

May 22, 2012

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET	
09-RENEW EO-1	
DATE	<u>MAY 22 2012</u>
RECD.	<u>MAY 23 2012</u>

Subject: Desert Renewable Energy Conservation Plan

Dear DRECP decision makers,

Thank you for this opportunity to review and comment on the Desert Renewable Energy Conservation Plan (DRECP) Development Focus Area (DFA) scenarios as laid out during the April 25th and 26th 2012 meeting .

The California Wilderness Coalition (CWC) is a non-profit organization incorporated under the laws of the State of California with its central office in Oakland, California, and field offices in Los Angeles and Shasta counties. CWC has more than 5,000 members and more than 200 member organizations and business sponsors. The CWC protects the natural landscapes that make California unique – providing clean air and water, a home to wildlife, and a place for spiritual renewal. The best remaining examples of these landscapes exist on the over 40 percent of California that is managed by such federal and state agencies as the U.S. Forest Service (USFS), Bureau of Land Management (BLM), National Park Service (NPS), U.S. Fish and Wildlife Service (USFWS) and California Department of Parks and Recreation. The most permanent and comprehensive way to protect government wild lands is to have them designated as “wilderness” by Congress (in the case of federal lands) or by the California State Legislature (in the case of lands managed by the state).

The CWC recognizes the importance of renewable energy in California and we do not believe that there has to be a significant conflict between the protection of wilderness-quality lands and “green” energy development. For example, we do not oppose energy development projects that are sited on private lands or sited on degraded lands close to existing infrastructure. We do believe that siting of renewable energy projects in the California desert and elsewhere should avoid negatively impacting the following: endangered and threatened species, Native American cultural sites and practices, public recreation (such as hiking, camping, hunting, fishing, etc), air quality, water quality and quantity, and scientific research. We also strongly believe that existing wilderness, wilderness study areas, proposed wilderness and citizens wilderness inventoried lands should be avoided when siting renewable energy.

From 1998 to 2001 the CWC conducted the Citizens Wilderness Inventory (CWI), a statewide survey of federal lands that met the definition of wilderness provided by Congress in the Wilderness Act of 1964. These include areas of land that:

- Are managed by the BLM, NPS, USFS or USFWS;
- Are over 5,000 acres or larger in size (smaller areas may be eligible under certain circumstances);
- Are “affected primarily by the forces of nature, with the imprint of man’s work substantially unnoticeable”; and
- Provide “outstanding opportunities for solitude or a primitive and unconfined type of recreation.”

The CWI identified 7.4 million acres of wilderness-eligible land around the state.

In 2011 the CWC decided that it was time to update the CWI to reflect federal land acquisitions, road closures, wilderness legislation and other factors. From 2011-2012 we focused on updating our maps of wilderness-eligible BLM lands and from 2012-2014 we will focus on USFS holdings.

Beginning in the early 2000s, the CWC began working with US Senator Dianne Feinstein as well as a diverse range of stakeholders including the US military, federal land management agencies, county officials, local governments, business owners, energy companies, recreation groups, and other community leaders on legislation to designate areas of federal public lands in the California desert as wilderness, national parks, and national monuments. The California Desert Protection Act (CDPA) of 2011 (S. 138) is a result of this collaborative process. The bill currently has over 125 major supporters and counting, including energy companies, city councils, chambers of commerce, county supervisors, local businesses, off highway vehicle groups, Native American tribes, outdoor recreation and tourism companies, and other environmental organizations.

We compared our revised and updated CWI maps for BLM lands as well as the map of Senator Feinstein’s CDPA to DRECP scenarios 4-6 and found the following potential areas of overlap. We say “potential” areas of overlap because the DRECP scenario maps are extremely hard to interpret with any precision. We would greatly appreciate more detailed maps of the various scenarios.

As is illustrated on the maps included with these comments, we found the following areas of potential overlap.

DRECP Scenario 4

It appears that the DFAs in Scenario 4 may overlap with the following wilderness-eligible areas identified in the CWI:

- Big Maria Mountains Potential Wilderness Additions (PWA). A PWA is a potential addition to an existing wilderness area.

- Coyote Mountains PWA
- Indian Wash Potential Wilderness (PW). A PW is a potential stand-alone wilderness area.
- McCloud Flat PW.

DRECP Scenario 5

It appears that the DFAs in Scenario 5 may overlap with the following wilderness-eligible areas identified in the CWI:

- Big Maria Mountains PWA;
- Bighorn Mountains PWA;
- Coyote Mountains PWA;
- Indian Wash PW;
- Little Picacho Peak PWA;
- McCloud Flat PW; and
- Middle Knob PW.

DRECP Scenario 6

It appears that the DFAs in Scenario 6 may overlap with the following wilderness-eligible areas identified in the CWI:

- Carson Slough PW;
- Coso Range PWA;
- Riggs Wash PW;
- Inyo Mountains PWA;
- Funeral Mountains PWA;
- Big Maria Mountains PWA;
- Bighorn Mountains PWA;
- Coyote Mountains PWA;
- Indian Wash PW;
- Little Picacho Peak PWA;
- McCloud Flat PW; and
- Middle Knob PW.

It also appears that the DFAs in Scenario 6 may overlap with the following lands in S. 138:

- Mojave Trails Proposed National Monument
- Kingston Range Proposed Wilderness Additions
- Avawatz Mountains Proposed Wilderness Additions
- Vinagre Wash Proposed Special Management Area

As the DRECP process moves forward and it begins to trigger site-specific National Environmental Policy Act (NEPA) analyses, we will be encouraging the BLM to identify all

wilderness-quality lands and to remove them from the list of areas that could be appropriate sites for energy development.

Instruction Memorandum (IM) 2011-154 and Manuals 6310 and 6320 set out the BLM's approach to protecting wilderness characteristics on the public lands. This guidance acknowledges that wilderness is a resource that is part of BLM's multiple use mission, requires the BLM to keep a current inventory of wilderness characteristics, and directs the agency to consider protection of these values in land use planning decisions. The IM (issued July 25, 2011) directs offices to "conduct and maintain inventories regarding the presence or absence of wilderness characteristics, and to consider identified lands with wilderness characteristics in land use plans and when analyzing projects under [NEPA]." BLM's wilderness inventory must be updated when:

- The public or BLM identifies wilderness characteristics as an issue during scoping in a NEPA analysis;
- Undertaking a land use planning process;
- BLM has new information concerning resource conditions, including public or citizens' wilderness proposals;
- A project that may impact wilderness characteristics is undergoing NEPA analysis; or
- Additional lands are acquired.

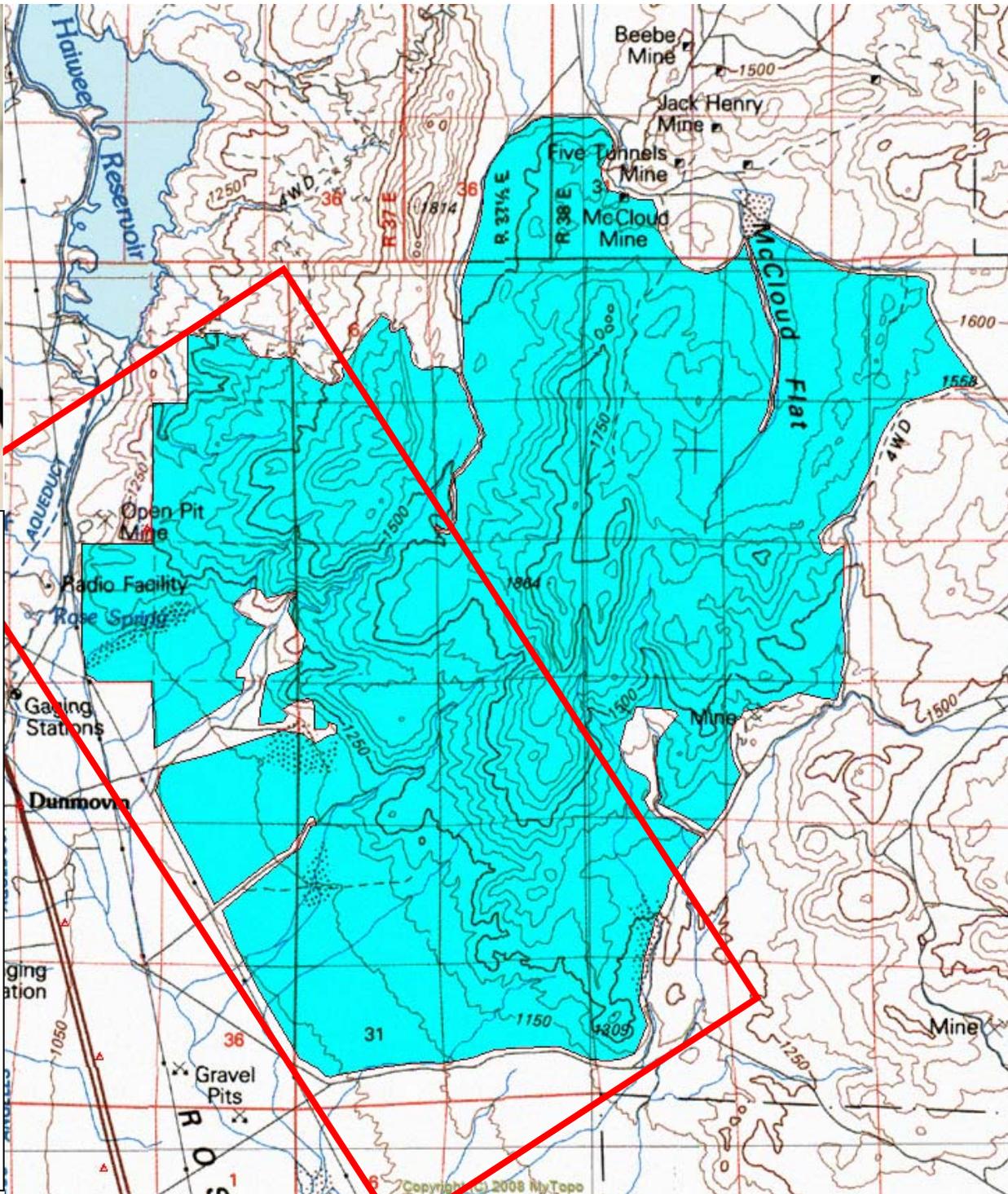
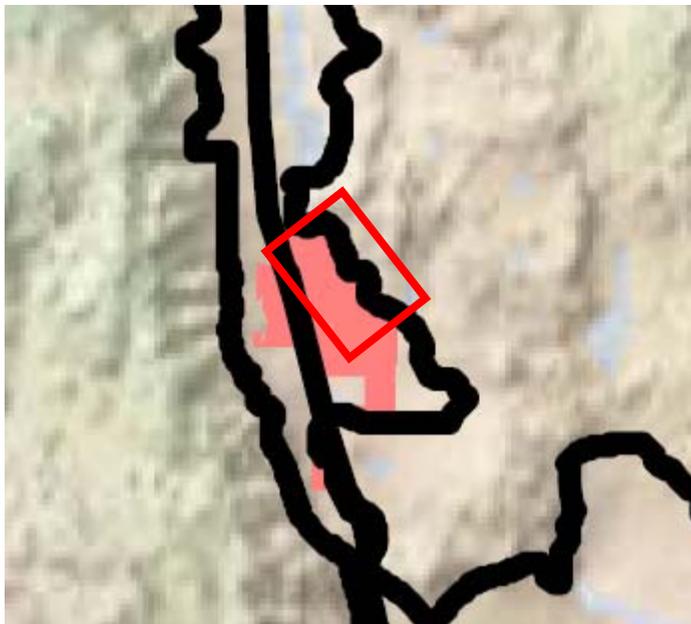
We request that the DFAs be modified to exclude all of the wilderness-quality lands listed above, as well as other wilderness-quality lands that the BLM might identify during NEPA assessments of individual energy development projects.

Thank you for your consideration.

Sincerely,



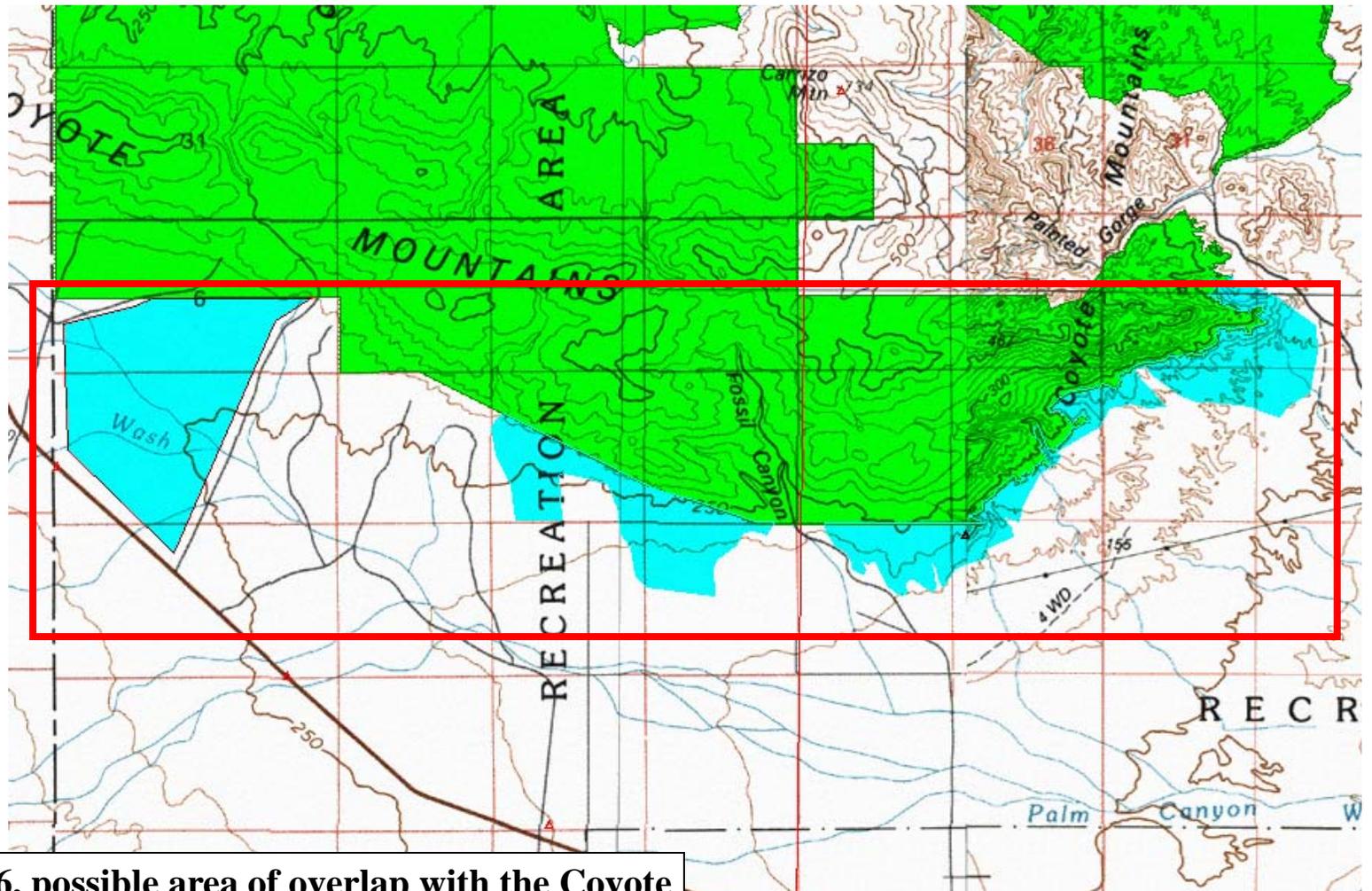
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DRECP Scenario 4, possible area of overlap with the McCloud Flat Potential Wilderness

 McCloud Flat Potential Wilderness

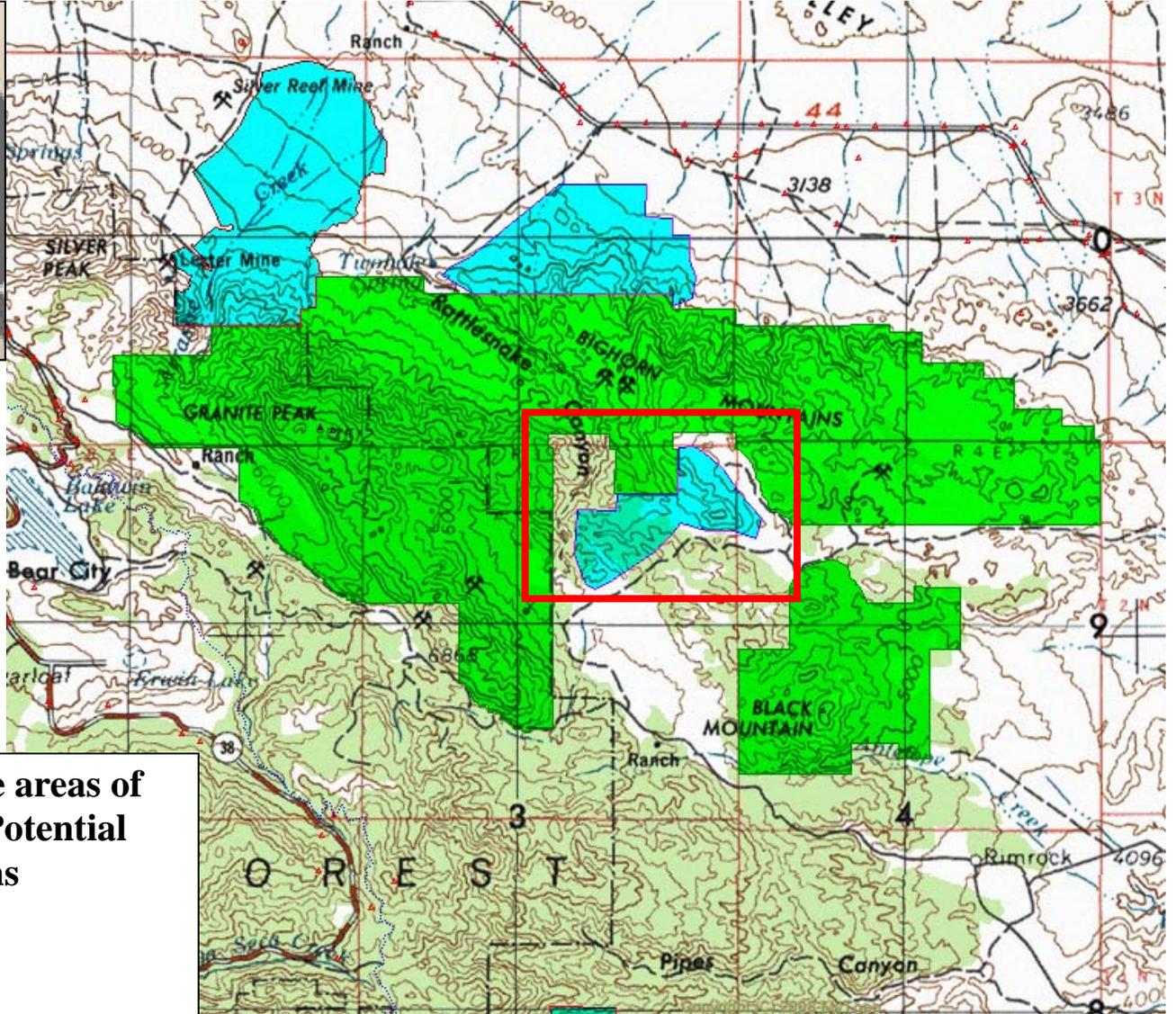
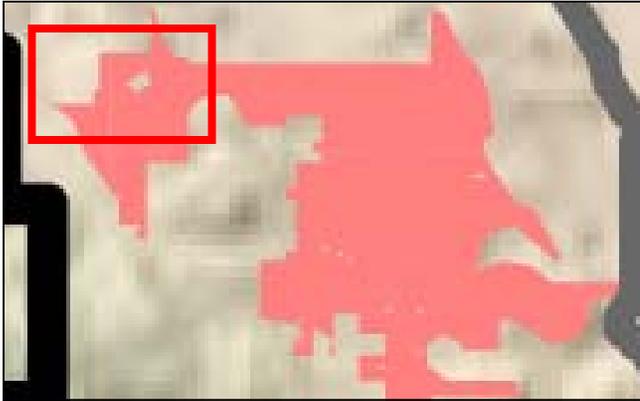
 Possible area of overlap



DRECP Scenarios 4-6, possible area of overlap with the Coyote Mountains Potential Wilderness Additions

-  Coyote Mountains Existing Wilderness
-  Coyote Mountains Potential Wilderness Additions
-  Possible area of overlap





DRECP Scenario 5, possible areas of overlap with the Bighorn Potential Wilderness Additions

 Bighorn Existing Wilderness

 Bighorn Potential Wilderness Additions

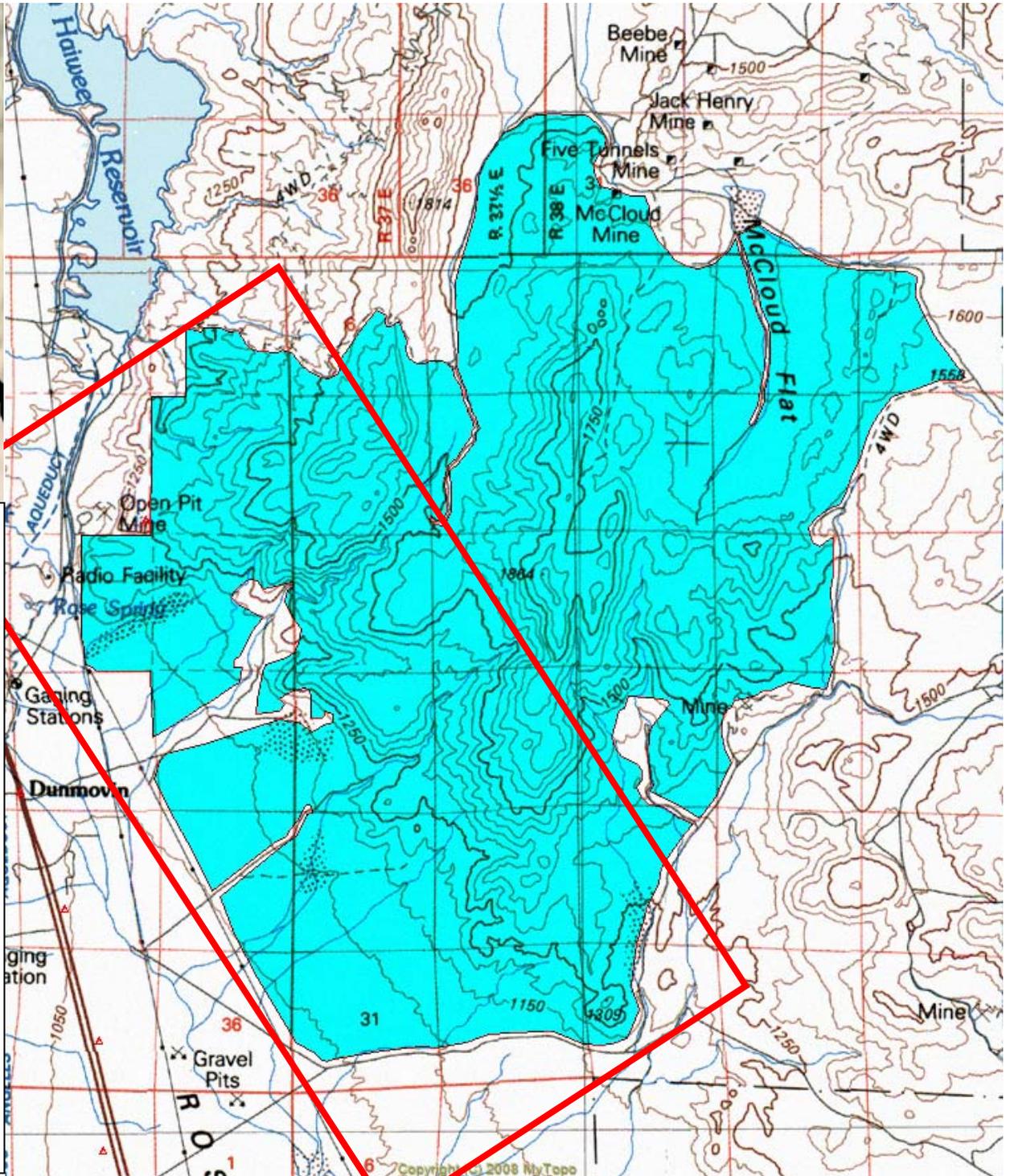
 Possible area of overlap

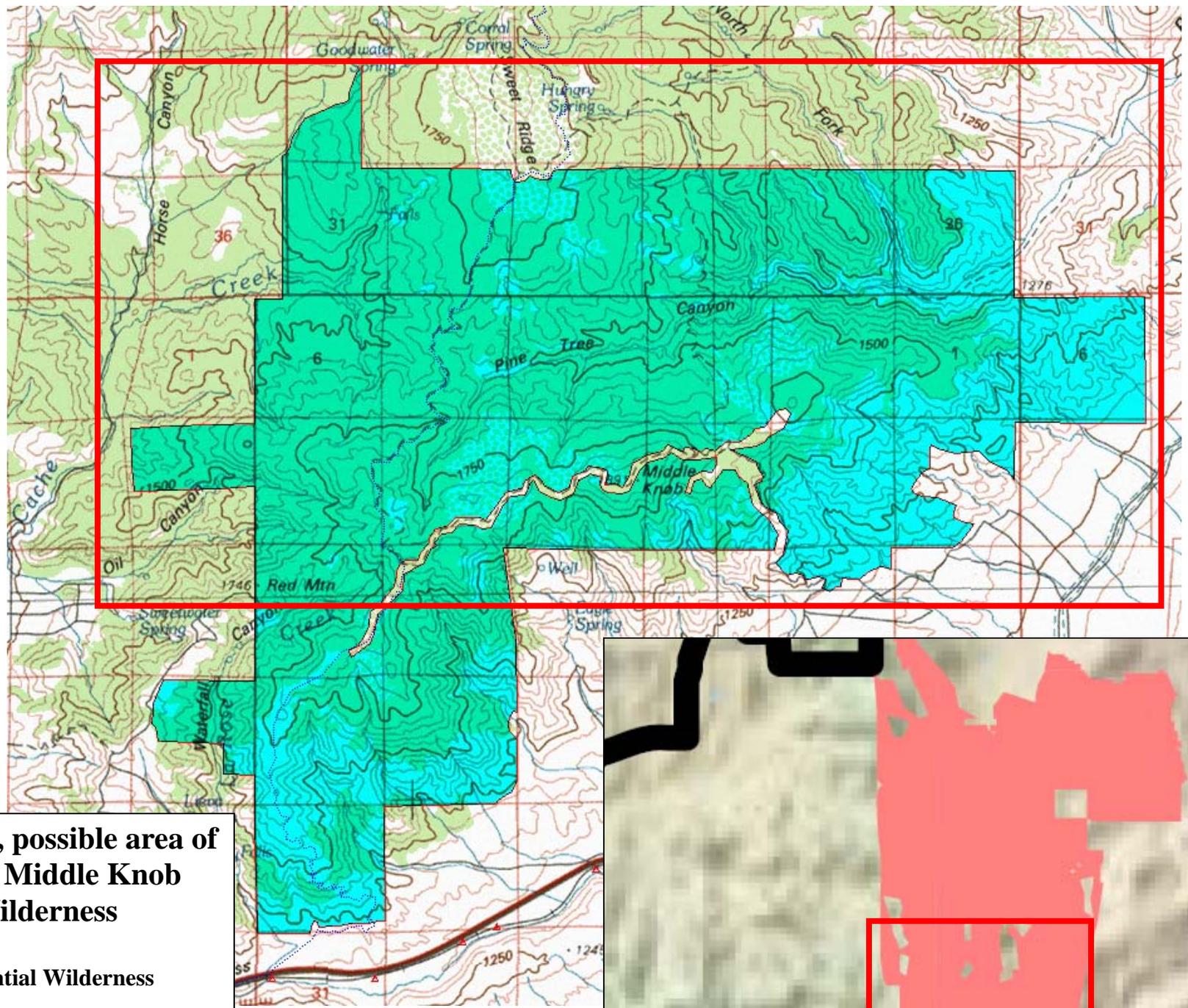


DRECP Scenario 5, possible area of overlap with the McCloud Flat Potential Wilderness

 McCloud Flat Potential Wilderness

 Possible area of overlap

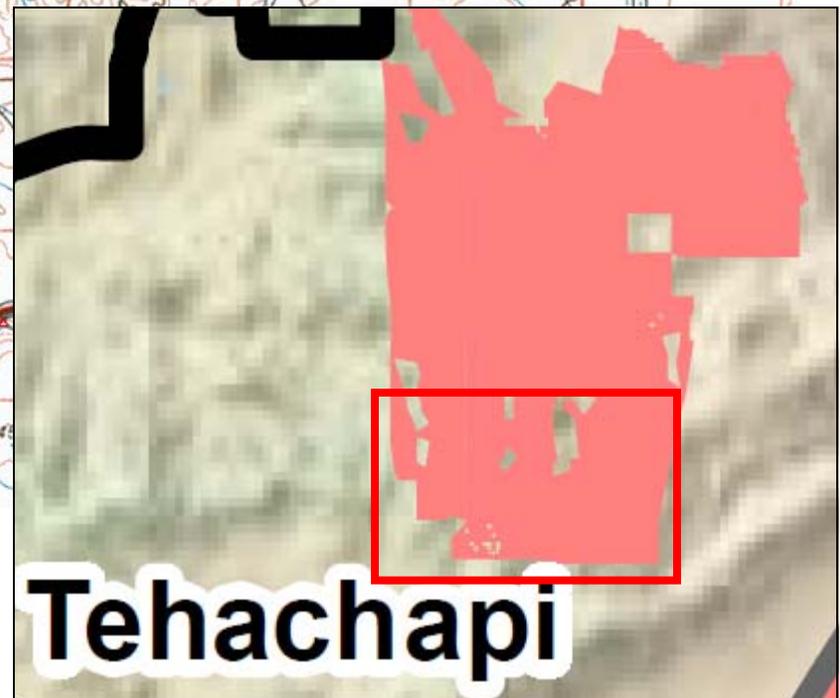




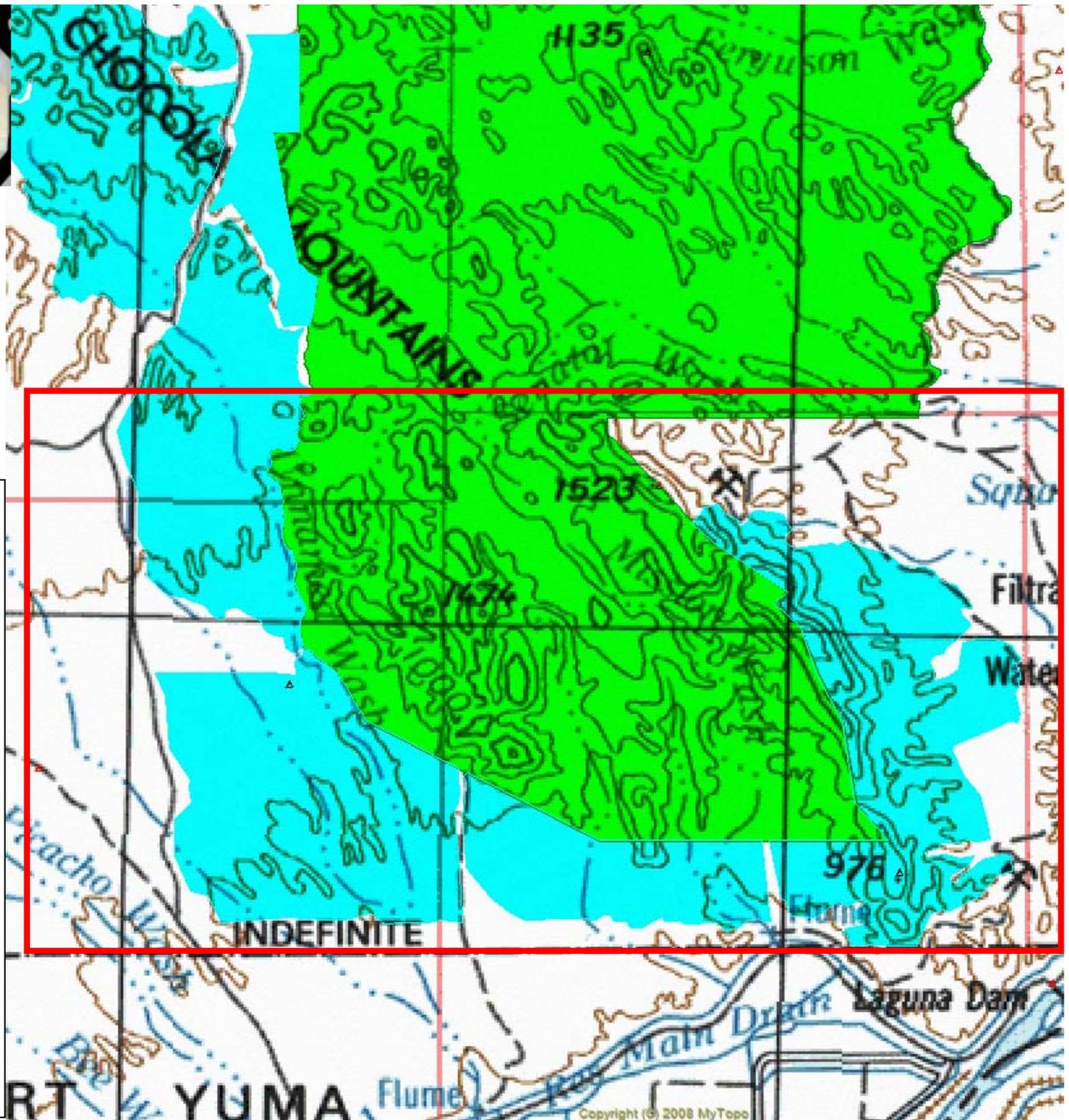
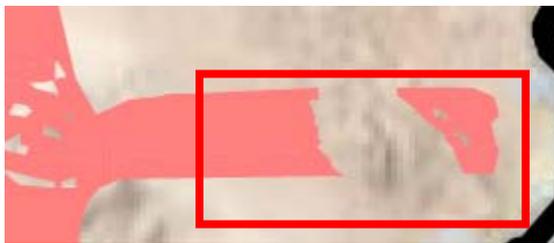
DRECP Scenario 5, possible area of overlap with the Middle Knob Potential Wilderness

 Middle Knob Potential Wilderness

 Possible area of overlap

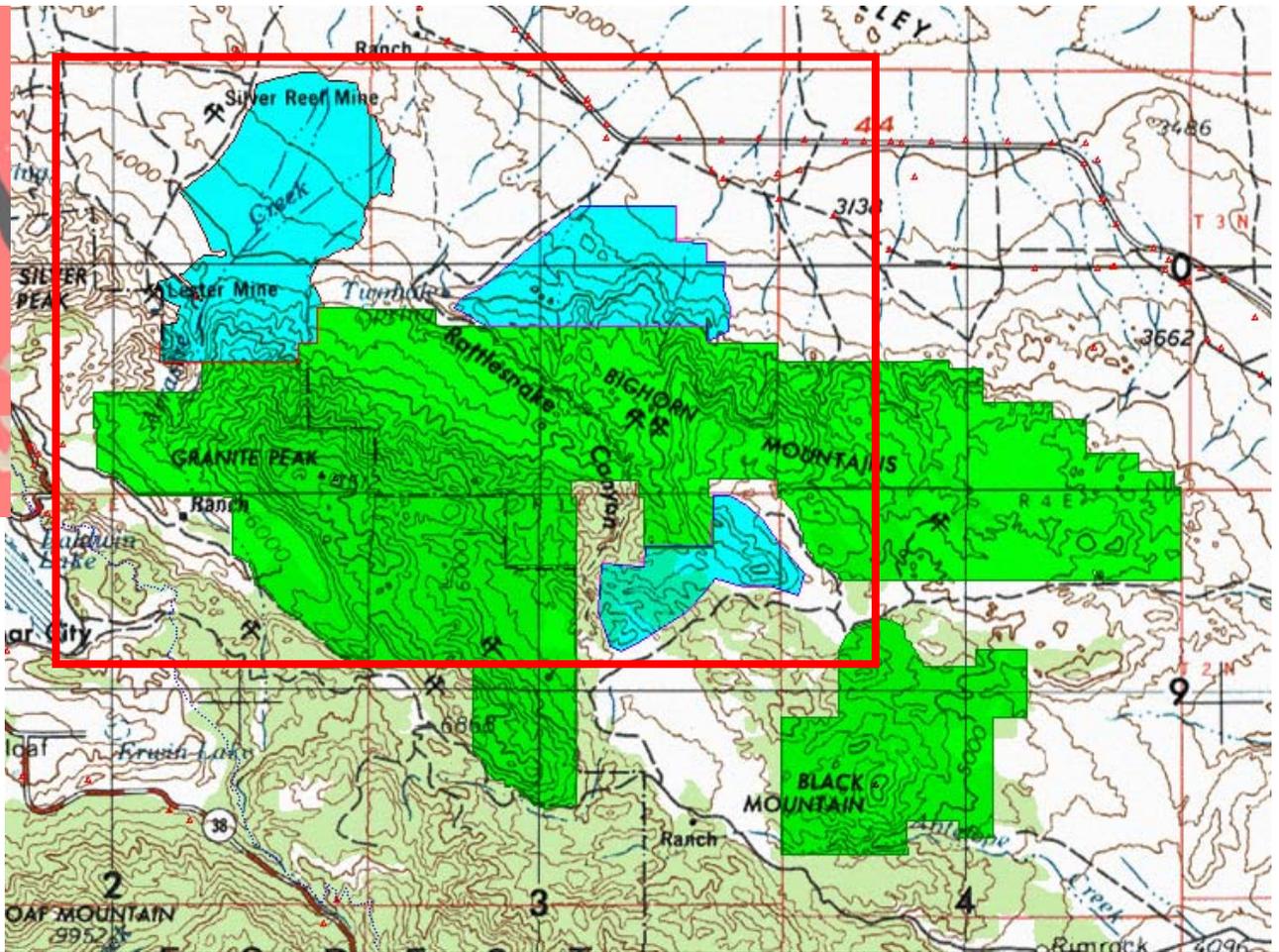


Tehachapi



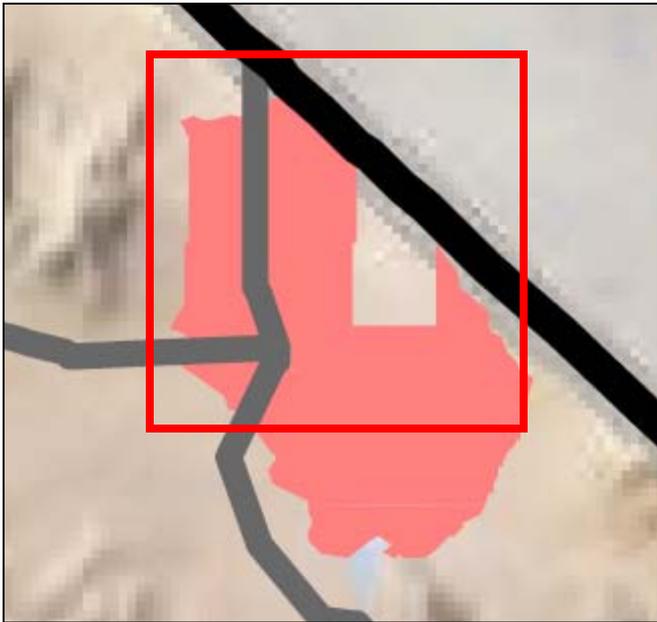
DRECP Scenarios 5-6, possible areas of overlap with the Little Picacho Peak Potential Wilderness Additions

-  Little Picacho Peak Existing Wilderness
-  Little Picacho Peak Potential Wilderness Additions
-  Possible area of overlap



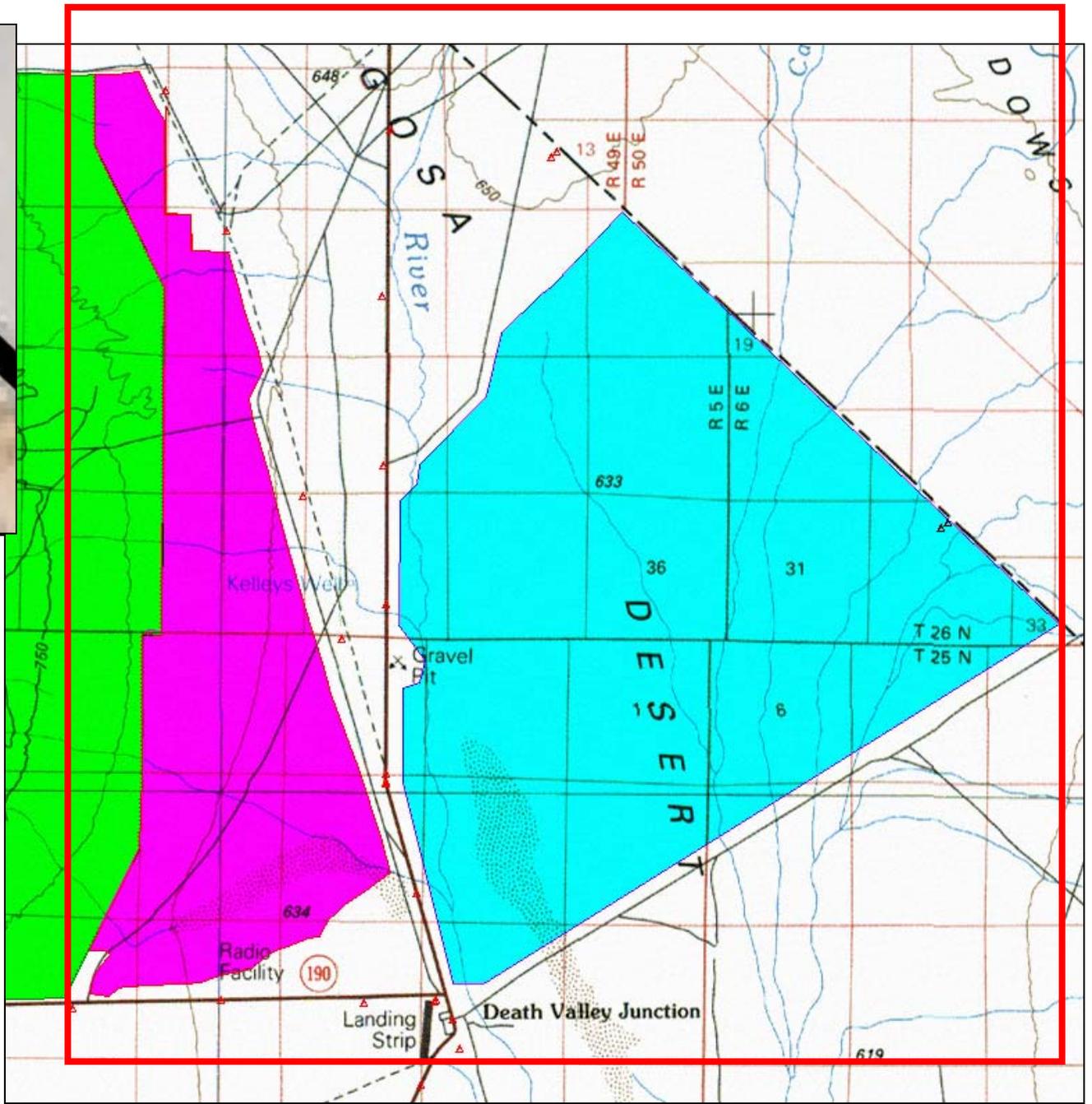
DRECP Scenario 6, possible areas of overlap with the Bighorn Potential Wilderness Additions

-  Bighorn Existing Wilderness
-  Bighorn Potential Wilderness Additions
-  Possible area of overlap



DRECP Scenario 6, possible areas of overlap with the Funeral Mountains Potential Wilderness Additions and the Carson Slough Potential Wilderness

-  Funeral Mountains Existing Wilderness
-  Funeral Mountains Potential Wilderness Additions
-  Carson Slough Potential Wilderness
-  Possible area of overlap





DRECP Scenario 6, possible areas of overlap with the Coso Range Potential Wilderness Additions



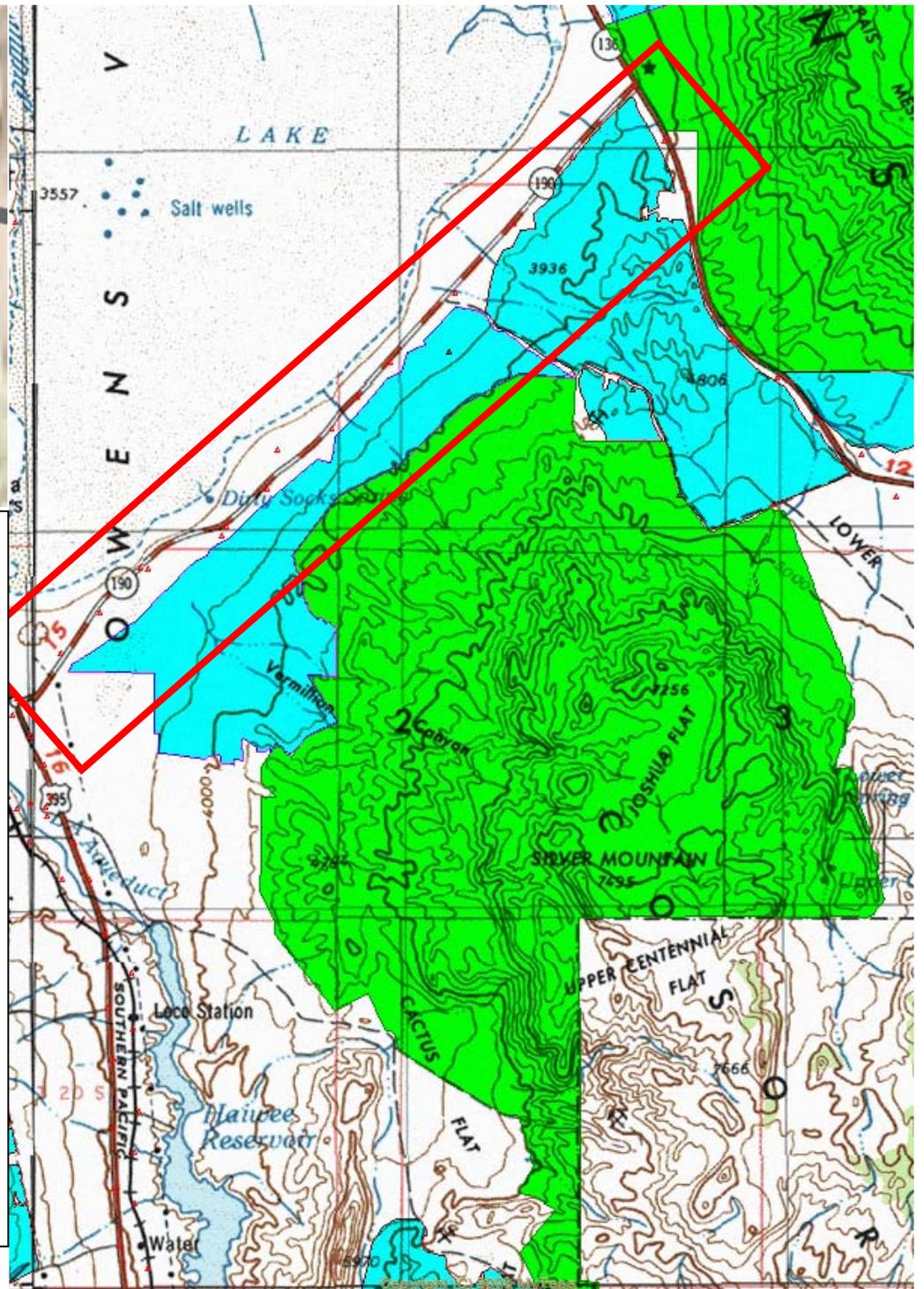
Coso Range Existing Wilderness



Coso Range Potential Wilderness Additions



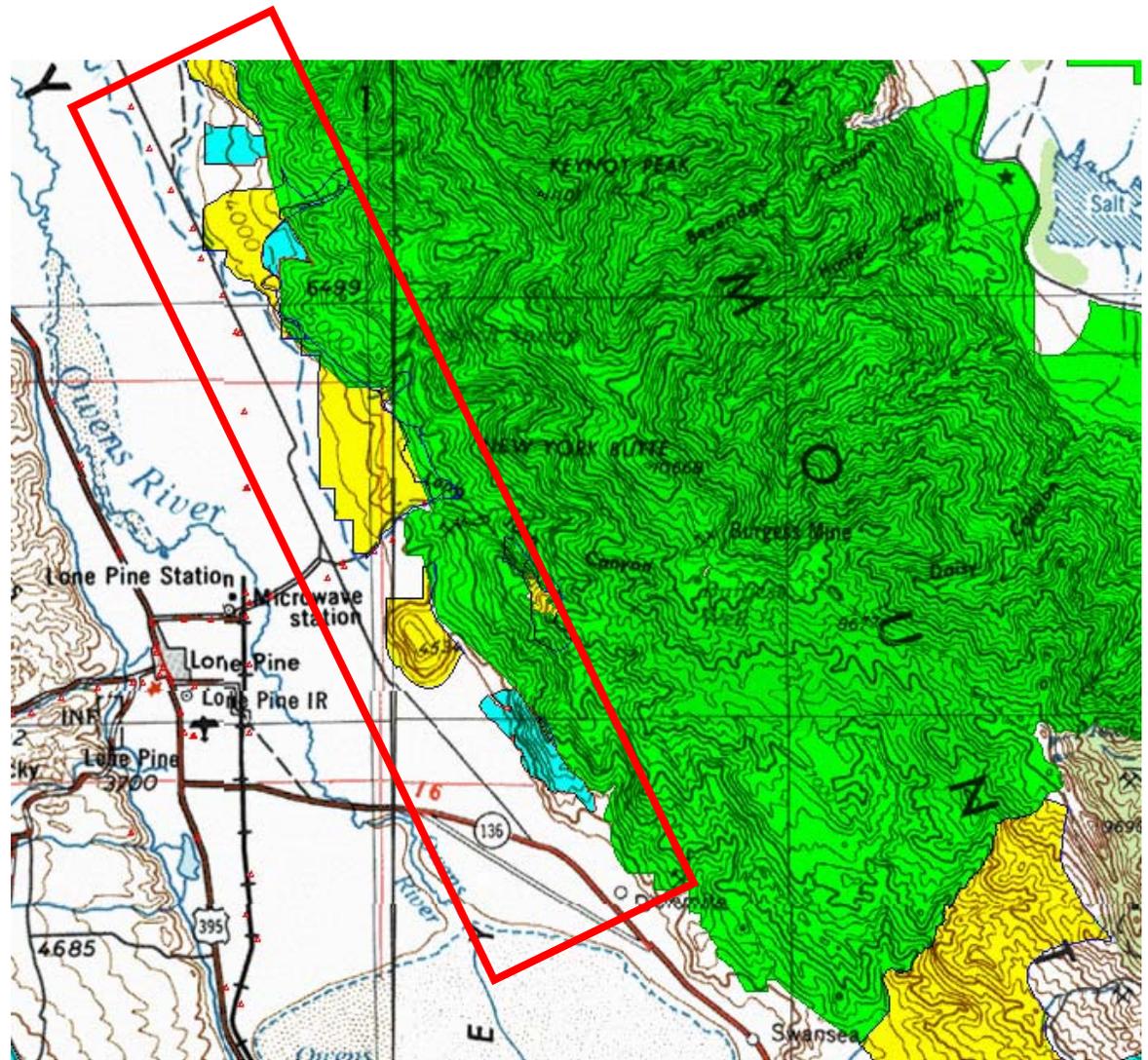
Possible area of overlap





DRECP Scenario 6, possible areas of overlap with the Inyo Mountains Potential Wilderness Additions

-  Inyo Mountains Existing Wilderness
-  Inyo Mountains Potential Wilderness Additions
-  Inyo Mountains Potential Wilderness Additions that are also BLM wilderness study areas
-  Possible area of overlap

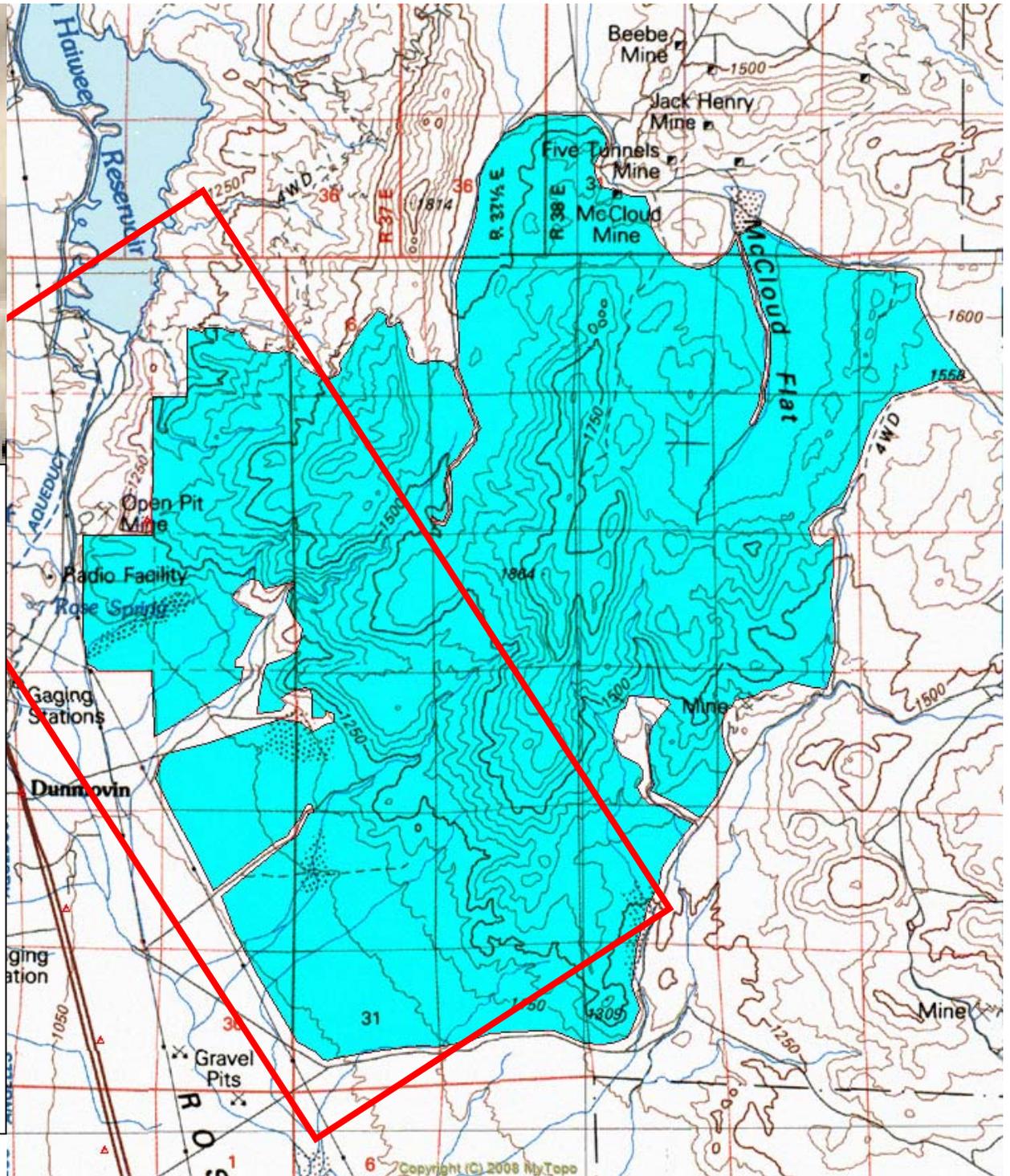




DRECP Scenario 6, possible area of overlap with the McCloud Flat Potential Wilderness

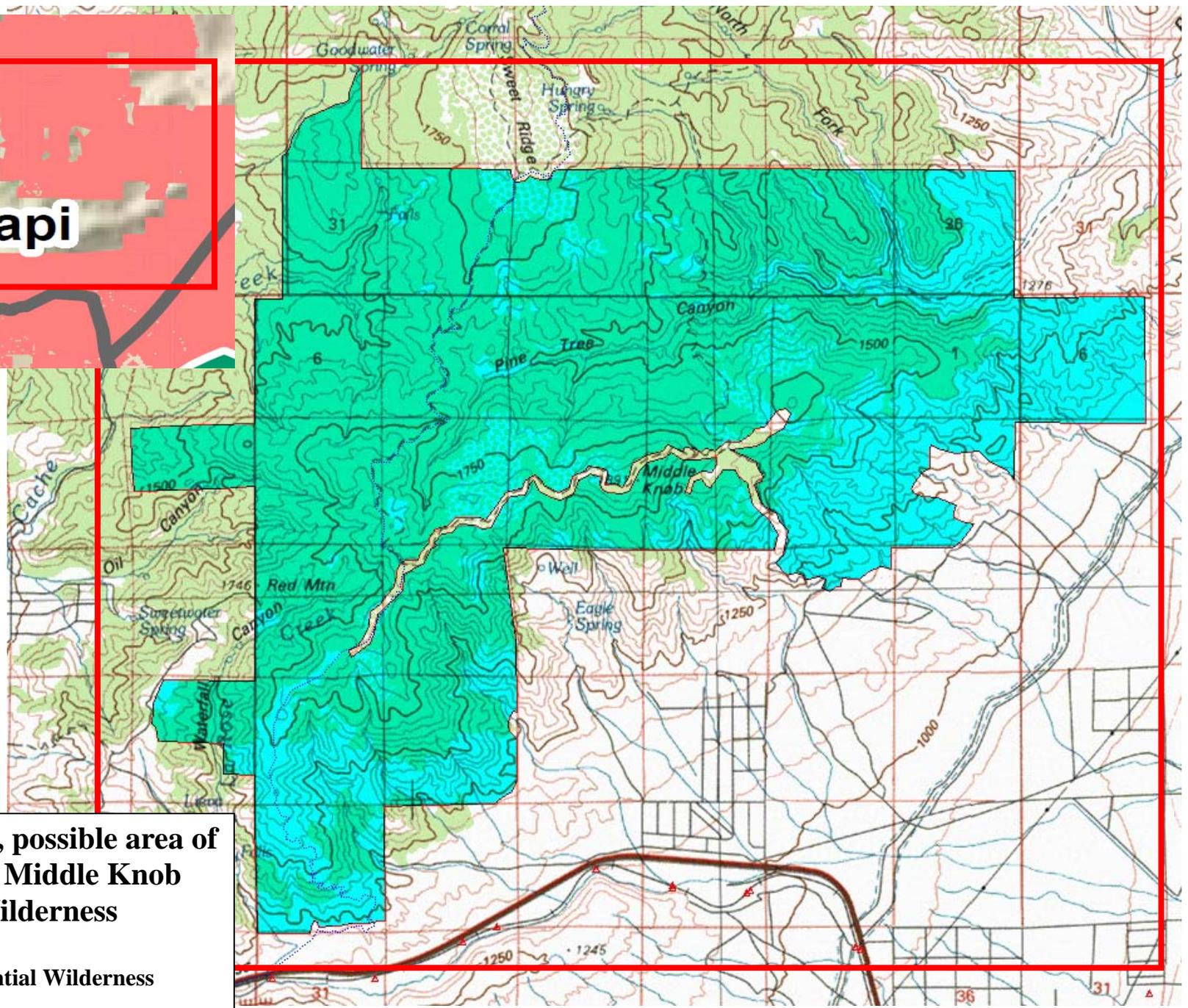
 McCloud Flat Potential Wilderness

 Possible area of overlap



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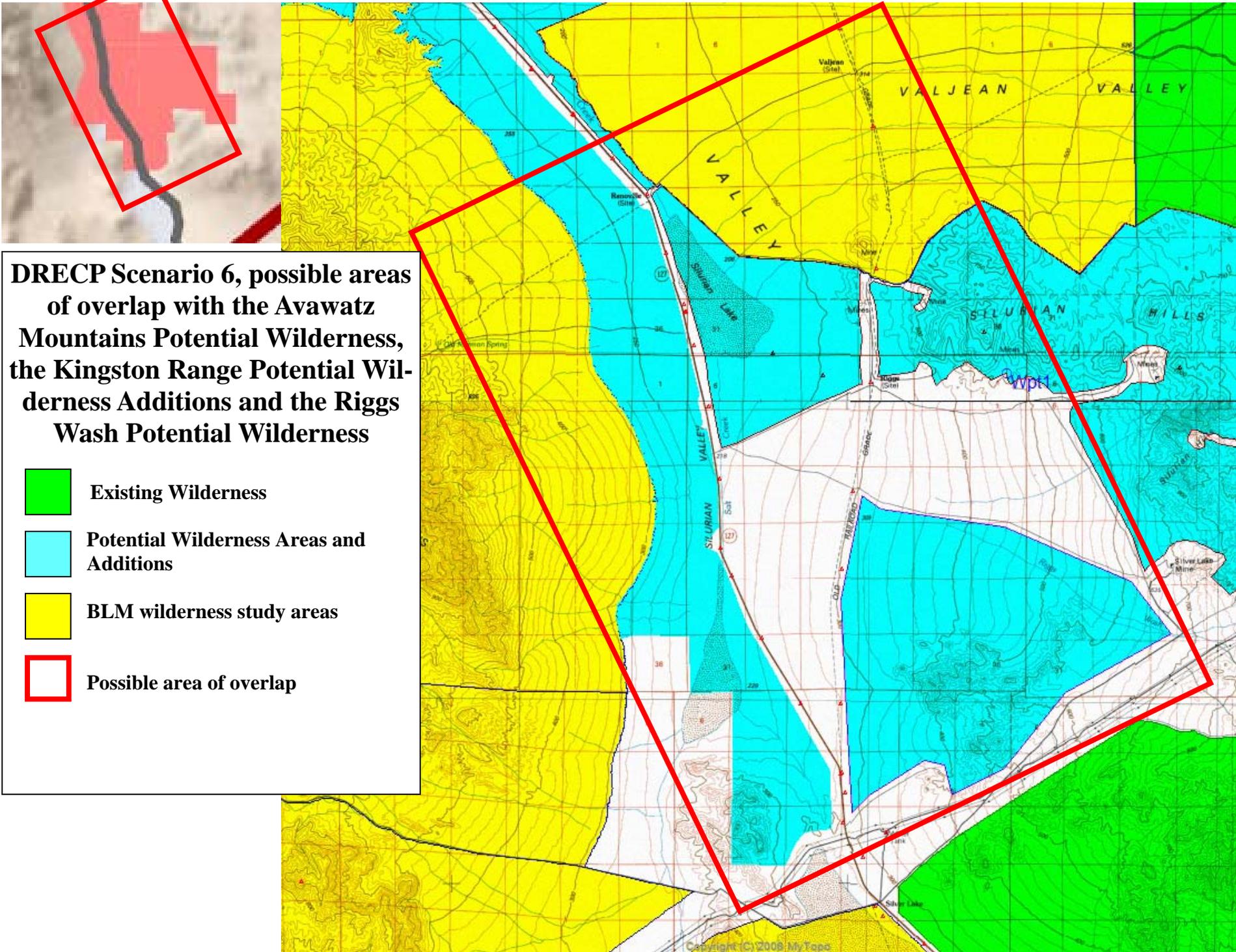
DRECP Scenario 6, possible area of overlap with the Middle Knob Potential Wilderness



Middle Knob Potential Wilderness



Possible area of overlap

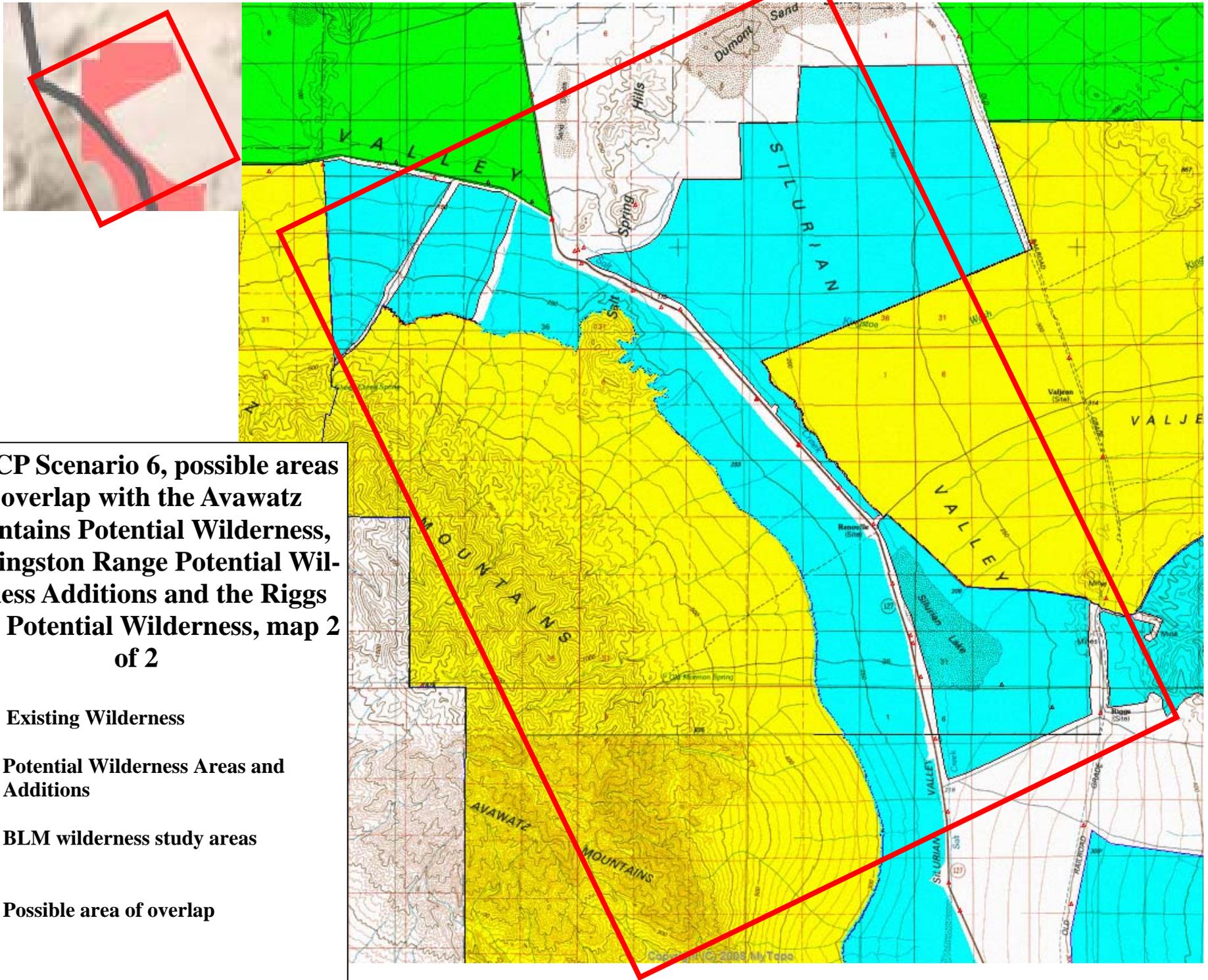


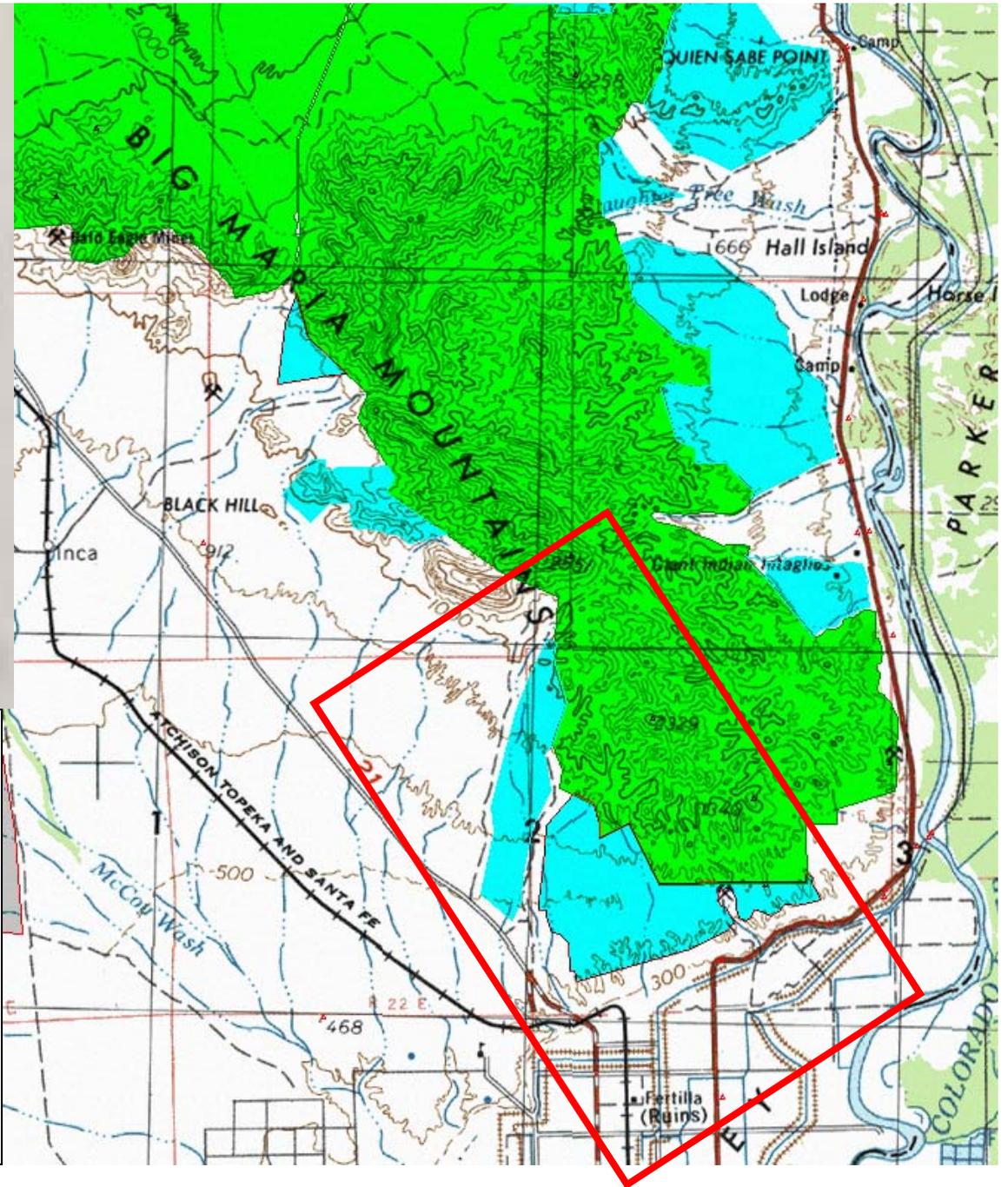
DRECP Scenario 6, possible areas of overlap with the Avawatz Mountains Potential Wilderness, the Kingston Range Potential Wilderness Additions and the Riggs Wash Potential Wilderness

- Existing Wilderness
- Potential Wilderness Areas and Additions
- BLM wilderness study areas
- Possible area of overlap

DRECP Scenario 6, possible areas of overlap with the Avawatz Mountains Potential Wilderness, the Kingston Range Potential Wilderness Additions and the Riggs Wash Potential Wilderness, map 2 of 2

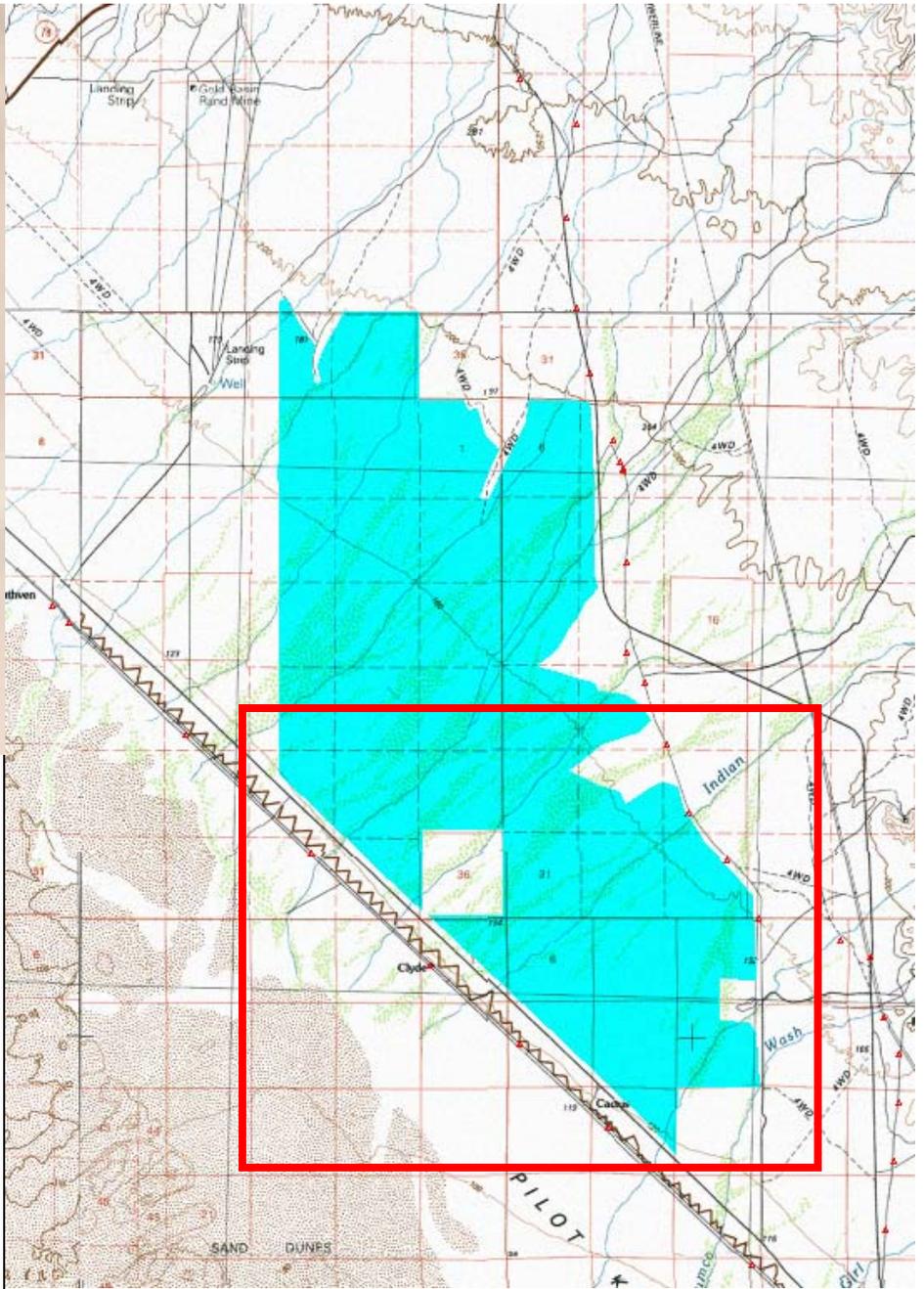
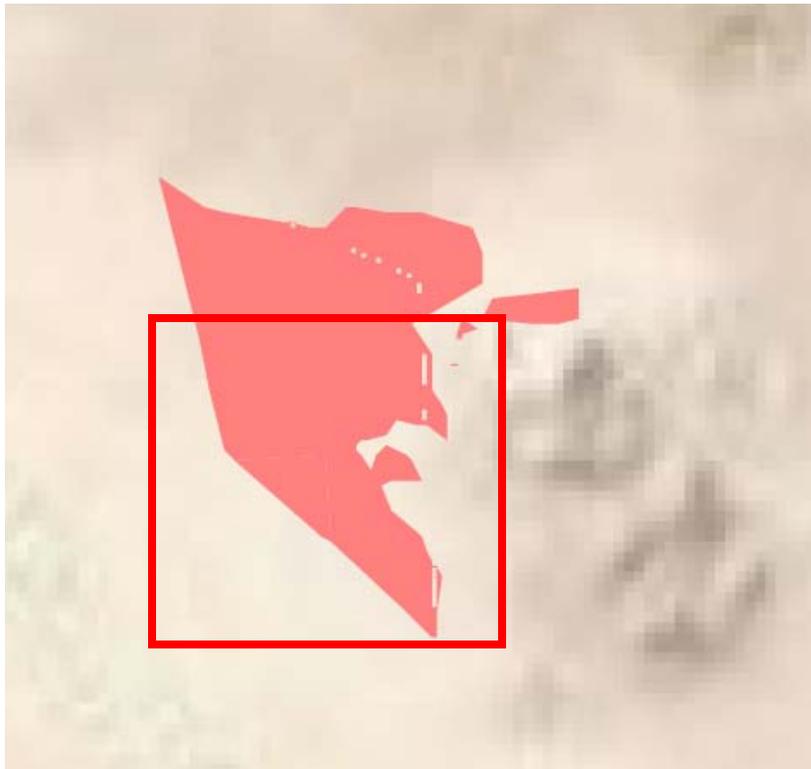
-  Existing Wilderness
-  Potential Wilderness Areas and Additions
-  BLM wilderness study areas
-  Possible area of overlap





DRECP Scenarios 4-6, possible area of overlap with the Big Maria Mountains Potential Wilderness Additions

-  Big Maria Mountains Existing Wilderness
-  Big Maria Mountains Potential Wilderness Additions
-  Possible area of overlap



DRECP Scenarios 4-6, possible area of overlap with the Indian Wash Potential Wilderness

 Indian Wash Potential Wilderness

 Possible area of overlap