

February 23, 2015

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
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RE: DRECP NEPA/CEQA

To the Renewable Energy Action Team,

I have personally attended several meetings regarding this Desert Renewable Energy Conservation Plan Draft (DRECP) to try and get a grasp of this 8,000+ page document. It is way too much to try to digest and understand in the amount of time allotted, even though the original 90-day public comment period was extended. With that said, I would like to respectfully ask that the comment period be extended yet again for another 90 days after the WEMO route designation Draft EIS plan comes out.

Now to the items that I would like to address:

1. The DRECP has been said to NOT be a Route Designation Plan and yet the long established Land Use Designations of:
 - a. Multiple-Use Class L (Limited Use)
 - b. Multiple-Use Class M (Moderate Use)
 - c. Multiple-Use Class I (Intensive Use)as defined in the 1980 California Desert Conservation Area Plan (CDCA) seem to have vanished in the DRECP document. These land use designations are easy to understand, have been in use for years, and have stood the test of time. They should be considered the gold standard and not be changed.
2. I have been involved in the land use arena since 1976, so you will have to bear with me when I say I do NOT trust this blanket Area of Environmental Concern (ACEC) that has been placed over the entire CDCA. ACEC's are very restrictive in nature and do not allow some of the uses that have been occurring for many years and are continuing on public lands today. May I make the suggestion that a NEW LAND DESIGNATION be added as the NEW blanket designation for lands not to be considered for renewable energy. With this new designation name, it would allow for the continued use of ACEC designations for those lands that need it. This NEW LAND DESIGNATION would easily solve a problem that will make this plan a lot more palatable to the recreating public. The NEW LAND DESIGNATION could be the Non-Renewable Energy Lands (NREL) or Wild Lands Protected from Renewable Energy Development (WLPRED). Whatever the NEW LAND DESIGNATION name would be, it would be preferable to ACEC.
Also, the very nature of the word "areas" describes islands of land, whether large or small, that needs protection, NOT the entire desert.

- a. One of the activities that could be affected by the blanket ACEC designation is the ongoing California Association of 4WD Clubs activities in the Panamint Valley, Panamint Valley Days. This 30-year (in November 2015) event, which utilizes only existing roads and trails, after the 5-year permit expires, might not be permitted again, as an ACEC does not allow for this type of activity. How many other events out there have a long history that would not be permitted in the future? Or can these events be grandfathered into the DRECP in the event a NEW LAND DESIGNATION is not considered?
3. In the National Conservation Landscape System, Section 2002 of the Omnibus Public Lands Management Act of 2009, Subsection (c)(2) directs the Secretary to manage the system “in a manner that protects the values for which the components of the system were designated.: The CDCA was designated by Congress in the Federal Land Policy and Management Act of 1976, in Section 601 [43 U.S.C. 1781] Subsection (a)(1) Congress found that “the California desert contains historical, scenic, archeological, environmental, biological, cultural, scientific, educational, recreational, and economic resources.”
 - a. In the DRECP Draft EIS/EIR, the CDCA’s Congressionally recognized value of “recreation” has been omitted. I hereby suggest that this needs to be corrected by adding “recreation” to Section 11.3.2.2.1.1, paragraph 1 of the DRECP Draft EIS/EIS so that it would then state “future travel management planning will emphasize travel on routes that provide for the enjoyment and enhancement of the ecological, cultural, scientific and recreational values for which individual units are designated.”
4. In the Special Recreation Management Areas, access to OHV areas, i.e., Dumont Dunes and Razor Road, have BLM designated routes of access which must be expanded in the SRMA’s for continued OHV access.
5. The BLM is the only agency that has the authority to regulate mining, therefore, any restrictions that might appear to restrict mining should be struck from the document. The DRECP does not have the authority to interfere or repeal the National Mineral and Mining Policy Act of 1872.
6. This, I realize, is not going to be a popular concept on your part, but I am still going to throw it out there. WHY do we need this monstrous plan when we have rooftops and parking lots in the cities where the most energy is needed? Parking lots that are just begging to have carports built over them with solar panels on top and shaded cars parked below. Cars would be cooler when you come back to them and would slow down the degradation of paint and materials inside. I have to ask, have you all been to Lancaster and Palmdale? If not, you need to go visit and see what these cities have done to collect solar energy within their city limits. They have parking lots covered at the high schools and even the car dealerships. They have tiny windmills atop their lighting in some of the shopping areas that generate their own energy each day for the following night. Many home rooftops are also being utilized. Innovative ideas that could be used all over the United States to help boost energy production and are compatible to the environment without destruction of land.

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7. I know that the Renewable Energy Zones proposed are mostly on private lands. Of course these property owners are looking at \$\$ lining their pockets and growing in their bank accounts. However, after the land has been determined to be free of endangered species, what of the other desert denizens that live there? They're homes are not only disturbed or destroyed, but how many must die for the sake of renewable solar energy that can be had in the very areas where it's needed most? The cities! On the roof tops and over the parking lots!

This concludes my most urgent concerns regarding the DRECP. I hope my suggestion of a NEW LAND DESIGNATION will be top priority.

Sincerely,

mary l. grimsley

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P.S. Hard copy in the mail.

CC: California Association of 4WD Clubs, Inc., John Stewart
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PLEASE WITHHOLD MY ADDRESS AND PHONE NUMBER FROM BEING PUBLISHED IN THE PUBLIC RECORD.

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IF MY REQUEST ABOVE CANNOT BE HONORED, PLEASE REMOVE THIS PAGE BEFORE PUBLISHING.

Thank you.