Conservation Lands Foundation
Protecting America's Heritage

February 23, 2015

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
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California Energy Commission
DOCKETED
09-RENEW EO-1
TN 75181
FEB 23 2015

Re: Comments on the Draft Desert Renewable Energy Conservation Plan pertaining to Additions to the National Conservation Lands

I. Introduction

The Conservation Lands Foundation (CLF) appreciates the opportunity to submit comments on the Draft Renewable Energy Conservation Plan (DRECP). Our comments focus on lands managed by the Bureau of Land Management (BLM) in the California Desert Conservation Area (CDCA). The California Desert is an extraordinary and complex ecosystem and we were pleased to see the preferred alternative for the DRECP would protect 3.52 million acres of the CDCA as part of the BLM managed National Conservation Lands.

The National Conservation Lands are 30 million acres of National Monuments, National Conservation Areas, Wilderness Areas, Wilderness Study Areas, Wild and Scenic Rivers and National Historic Trails, protected for their extraordinary ecological, scientific and historic resources. They are managed so all Americans can discover and explore these spectacular places. The National Conservation Lands are supported by a network of more than 50 Friends groups around the nation who care deeply about protecting and promoting their spectacular resources. The Friends Grassroots Network is excited about the potential expansion of the National Conservation Lands and the growing recognition of BLM lands as worthy of long-term protection. In September of 2013, members of the Network and National Partner groups sent a letter to BLM Director Neil Kornze, expressing their strong support for identifying and adding lands in the CDCA to the National Conservation Lands. (***See Attachment B***)

CLF is the only organization whose sole mission is to protect, expand and restore the National Conservation Lands. We recognize these lands are also important for the economic future of the desert. Throughout the DRECP process we have worked to educate the desert community about the National Conservation Lands and BLM's conservation mandate. An example of this outreach is demonstrated by the diverse set of supporters that CLF mobilized in support for additions to National Conservation Lands through the DRECP process. (***See Attachment C- Letter Sent to Secretary Sally Jewel*** and ***Attachment D-Letter Sent to BLM Director Neil Kornze***)

Since the Omnibus Public Land Management Act became law in 2009 (PL -111-11), the BLM has invested heavily in developing a conservation policy regime that is worthy of the

splendid diversity of the National Conservation Lands. This policy regime squarely supports the primacy of conservation over other uses on National Conservation Lands and establishes minimum standards for management to ensure consistent management across 30 million acres. Unfortunately, the proposed management language for additions to the National Conservation Lands in the DRECP does not meet the minimum standards, does not place the primacy of conservation over other uses and does not foster consistent management. In addition, the intent of the Omnibus was that lands in the CDCA identified for conservation would be permanently protected as part of the National Conservation Lands. Any other interpretation undermines the entire system. Each of these issues needs to be addressed and fixed in the Record of Decision.

Our comments identify the changes needed to meet the conservation policy standards for additions to the National Conservation Lands.

II. Permanence

The 2009 Omnibus Bill established the National Conservation Lands (National Landscape Conservation System) as a system of protected public lands, "…to conserve, protect and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations."[1] The Omnibus listed the type of designations and areas that would become part of this permanent system, which included "public land within the California Desert Conservation Area administered by the Bureau of Land Management for conservation purposes."[2]

The whole purpose of the law was to turn a BLM administrative structure into a permanent system. Every component of the National Conservation Lands articulated in the law became a permanent part of the new system.[3] Due to the size and complexity of the California Desert, Congress left it up to the agency to decide which lands in the CDCA would be identified as "administered for conservation purposes." However, Congress did not give BLM the authority to remove areas in the CDCA from the National Conservation Lands- only to add them.

It has been almost six years since Congress directed BLM to add portions of the CDCA to the National Conservation Lands. The BLM has chosen the DRECP as the planning process to identify these lands. However, BLM is not required by Congress to undergo an extensive planning effort in order to identify lands to be added to the system. BLM's choice to utilize a planning process to identify additions does not mean these additions can be undesignated in future planning processes.

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[1] Public Law 111-11.

[2] 16 U.S.C. Sec. 7202(b).

[3] Wilderness Study Areas are the only exception. "Until Congress makes a final determination on a WSA, the BLM manages these areas to preserve their suitability for designation as wilderness." www.blm.gov/wo/st/en/prog/blm_special_areas/NLCS/wilderness_study_areas.html

Since BLM has chosen the DRECP process to identify lands for conservation in the CDCA, the agency must make clear during this process that these additions are a permanent part of the National Conservation Lands.

III. Policy Standards For the National Conservation Lands

To ensure that the National Conservation Lands are managed in order to "conserve, protect and restore nationally significant landscapes," all new additions to the system have several basic conservation standards, including:

1) Prescriptive language that requires the area to be managed for the conservation, protection and enhancement of resources over other uses;
2) A prohibition on discretionary uses that are not consistent with conservation and protection of these resources;
3) A mineral withdrawal; and
4) Restrictions on off-road vehicles and a travel management plan with restrictions necessary to protect the area.

Many units in the system have additional protections in place to ensure conservation of unique resources in individual areas. However, the four standards above are consistent throughout the system. These standards ensure that lands within the system are managed consistently for conservation and safeguarded for future generations.

Conservation standards for the system have also been outlined in Department of Interior guidance and BLM policies. In 2010, Secretarial Order 3308 established a unified conservation vision for managing the National Conservation Lands 'as required by the Omnibus Act of 2009' to "conserve, protect, and restore nationally significant landscapes." In 2011, BLM released the 15-Year Strategic Plan, setting specific goals for how to manage the National Conservation Lands focused on conservation, protection and restoration. In 2012 Policy Manuals were released which interpreted the national policy and set guidance for daily management decisions.

There are established conservation policies in place to maintain the integrity of the system and ensure protection of the resources. New additions to the National Conservation Lands must follow these standards and be managed accordingly. **The following are areas in which the draft DRECP does not meet current National Conservation Land's standards:**

a. Failure to include a mandatory mineral withdrawal

As stated above, a basic conservation mandate for all additions to the National Conservation Lands is a mineral withdrawal. The National Conservation Lands are to be managed to "conserve, protect and restore" nationally significant landscapes, and uses incompatible

with conservation are prohibited. As recognized in every other unit of the National Conservation Lands, mining is not compatible with conservation.[4]

The preferred alternative in the DRECP does not restrict future mining claims. Instead the preferred alternative would make new additions "controlled" or "limited" use areas.[5] Alternatives 2, 3 and 4 do recognize the need for a mineral withdrawal and recommend a phased review and withdrawal process. Although these alternatives are better than the preferred, neither alternative in the DRECP is acceptable. All proposed additions to the National Conservation Lands **MUST** come with a mineral withdrawal.

b. Disturbance caps

The DRECP alternatives for new additions to the National Conservation Lands have various levels of allowed disturbances. The disturbance caps range from 1% in the preferred alternative to .25% in Alternatives 2 & 3. Disturbance caps allow for future unknown and unspecified "disturbances" to take place in the National Conservation Lands. No other units within the system have a disturbance cap. Instead, these units are managed with conservation and protection as the "primary objective."[6]

Disturbance caps are fraught with ambiguity and threaten the protection of the National Conservation Lands. Just a few examples of the inherent lack of clarity include: 1) whether disturbance caps apply only to allowable uses or all uses; 2) how the effects of specific disturbances are calculated; 3) whether caps include BLM authorized disturbances, man-made disturbances and/or natural disturbances; 3) whether the concept includes past disturbances and if so, does BLM have adequate baseline data? and 4) what process the BLM will use to monitor and mitigate disturbances. This last example is especially worrisome since the DRECP does not include additional funding for implementation and enforcement.

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[4] ***Resource Management Plan- Ironwood National Forest Sec. 3.2.1.2 Mineral Resources***- All of the lands and interests in lands (e.g., federal minerals) within the [Ironwood Forest National Monument] boundaries have been withdrawn from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing and mineral material disposal (Office of the President 2000). Thus, no new mining claims can be located on the Federal mineral estate within the IFNM. Mineral development can only occur on mining claims that BLM has determined are valid.
BLM Manual 6220- Sec. O Withdraws and Valid Existing Rights For Monuments, Conservation areas and Similar Designations, BLM "should consider closing the area to mineral leasing, mineral material sales, and vegetative sales, subject to valid existing rights, where that component's designating authority does not already do so."

[5] Draft Plan at II.3.2.2.1.1

[6] ***Secretarial Order 3308- Sec. 4 (a)***. "The BLM shall ensure that the components of the [National Conservation Lands] are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values."
BLM's 15-Year Strategy for the National Conservation Lands: "The [National Conservation Lands] are designated by Congress of the President to conserve, protect, and restore their unique values for the benefit of current and future generations. As such, there is an overarching and explicit commitment to conservation and resource protection as the primary objective."

Disturbance caps are an ambiguous concept that negates the premise that conservation is the primary mandate for the National Conservation Lands. Allowing varying degrees of "disturbances" to take place within the new additions to the National Conservation Lands undermines the entire system and does not adequately protect the California Desert ecosystem. Additions to the National Conservation Lands cannot include disturbance caps.

c. Travel Management

All DRECP alternatives state that travel management planning for additions to the National Conservation Lands, "will emphasize travel on routes that provide for the enjoyment and enhancement of the ecological, cultural, and scientific values for which individual units are designated, or necessary administrative access to conserve, protect and restore area values." While we understand that recreational opportunities offered by roads help visitors enjoy and access the National Conservation Lands, the conservation and protection of the area's resources must be the primary objective. The Omnibus Public Lands Act of 2009 (Public Law 111-11) states that the National Conservation Lands should be managed for the conservation of "ecological, cultural and scientific values" – it does not identify recreation as a management objective on par with conservation. In areas where recreation can undermine conservation, conservation should be paramount.

BLM has recognized that roads negatively impact conservation values and has developed policies intended to minimize and limit roads, both to protect the resources and enhance visitor experiences.[7] As written, the language in the DRECP is not consistent with BLM's own policy for managing the National Conservation Lands. Roads should allow for the access and enjoyment of visitors to experience the scenic views, open space and historical treasures which make this system so unique. However, all alternatives in the DRECP must limit travel on roads and routes in the National Conservation Lands in order to protect their "ecological, cultural and scientific values." BLM must provide stronger and more restrictive language pertaining to travel management in the National Conservation Lands.

d. ACEC Overlap with National Conservation Lands

The DRECP states that if an Area of Critical Environmental Concern (ACEC) overlaps with an area of the National Conservation Lands, "it is BLM's expectation that it will identify these areas solely as National Conservation Lands."[8] In other words, the National Conservation Lands would absorb the ACEC and its "special" management standards. This is not consistent with how BLM currently manages overlapping ACEC and National Conservation Lands.

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[7] ***BLM Manual 6100 Sec. 1.6 (I)(3):*** The BLM will only develop new facilities, including roads, within [National Conservation Lands] units where they are required under law, required for public health and safety, are necessary for the exercise of valid existing rights or other non-discretionary uses, prevent impacts to fragile resources, or further the purposes for which an area was designated.
BLM Manual 6100 Sec. 1.6 (M)(2): Roads, primitive roads, and trails within the [National Conservation Land] units will be located to minimize impacts to sensitive resources, enhance visitor recreation experiences, and conserve, protect, and restore the values for which the [National Conservation Land] units were designated.
[8] DRECP II.3.2.2.1.1.3.

ACEC are identified to provide special management to areas to "protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes."[9] Because many ACEC focus on the protection of a specific resource that is under threat, at times they can have stronger conservation standards than offered in the National Conservation Lands. When this is the case, the more restrictive conservation standards in the ACEC must be retained in order to protect the resource. This overlapping is common in the National Conservation Lands and BLM has recognized the importance of applying the more restrictive conservation standard in order to protect the resources.[10] For areas where ACEC and National Conservation Lands overlap, BLM must apply and manage the resources according to the more restrictive conservation standard.

IV. Conclusion

Thank you for the opportunity to submit comments on the DRECP. While we are excited to see the preferred alternative would add millions of acres to the National Conservation Lands, the proposed management does not meet current standards for additions to the system. The following clarifications must be made in order to ensure primacy of conservation and consistency in management:

- Additions to the National Conservation Lands must be permanent;
- All additions must have a mineral withdrawal;
- Additions must not include "disturbance caps;"
- Additions must limit roads; and
- Where there is overlap of ACEC and National Conservation Lands, the most restrictive conservation standard must apply.

Lastly, we agree with all the areas in the preferred alternative that BLM has identified as additions to the National Conservation Lands. However, there are additional areas in the CDCA that are also worthy of permanent protection as part of the National Conservation Lands. Please see **Attachment A** for a complete list of these areas.

Please feel free to contact the Conservation Lands Foundation with any questions.

Sincerely,

Brian O'Donnell
Executive Director
Conservation Lands Foundation
970-247-0807

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[9] 43 U.S.C. Sec. 1712(a).

[10] Overlapping and the concept of using the most restrictive conservation standard also occurs when Wilderness Areas overlap with National Monuments and National Conservation Areas.

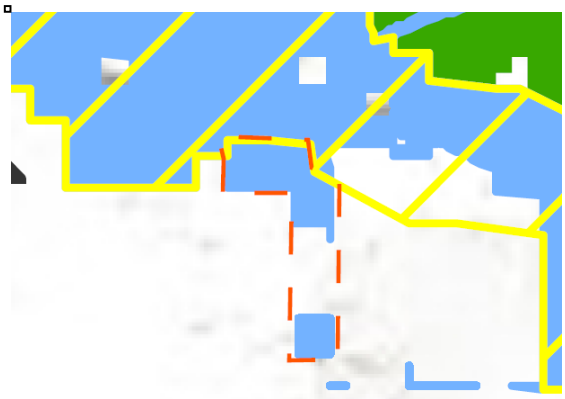
ATTACHMENT A

The Conservation Lands Foundation agrees with the National Conservation Lands area-specific recommendations made by The Wilderness Society. (***See The Wilderness Society Comments, Sec. G***). While we support all the areas recommended for additions to the National Conservation Lands in the preferred alternative, we agree there are many additional areas in the CDCA that are worthy of inclusion in the National Conservation Lands due to their ecological, cultural, scientific, scenic and historic resources. For your convenience we have attached the Wilderness Society's list of lands worthy of additions to the National Conservation Lands. A map pinpointing these locations within the CDCA is located on page 17.

SECTION G

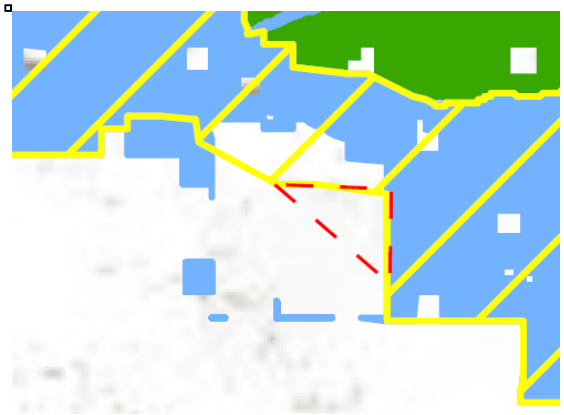
Our proposed additions to BLM's National Conservation Lands in the CDCA are listed in alphabetical order. Please note that on the maps included below, proposed National Conservation Lands under the Preferred Alternative are shown with yellow diagonal lines, and our recommended additions to the National Conservation Lands are shown in red or blue.

Argos (Route 66)



The Argos area, consisting of approximately 10,450 acres, is located in San Bernardino County, southwest of Ludlow. According to the California Department of Fish and Wildlife's (CDFW) Natural Diversity Database (NDD), the area is habitat for the Alverson's foxtail cactus, American badger, burrowing owl, desert tortoise, Emory's crucifixion thorn, Le Conte's thrasher, Mojave fringe-toed lizard, and white-margined beardtongue flower.[11] CDFW recognizes the area as a wildlife migration corridor and data from the agency indicates that it has eight distinct plant communities.[12] Due to its close proximity to historic Route 66, the area is also an important part of the Route 66 viewshed. While most of the area is included in National Conservation Lands under the Preferred Alternative, we request that the area shown in red be included as well in order to fully protect the area and its important values.

Ash Hill (Route 66)



The Ash Hill area, consisting of approximately 19,150 acres, is located in San Bernardino County, south of Ludlow. According to the CDFW's NDD, the area is habitat for Alverson's foxtail cactus, American badger, burrowing owl, desert tortoise, desert bighorn sheep, Emory's crucifixion-thorn, Le Conte's thrasher, and the Mojave fringe-toed lizard.[13] The area also has five distinct plant communities.[14] Archaeologists have found

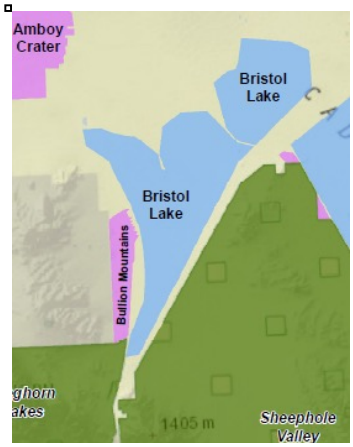
[11] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
[12] GIS analysis completed by Kurt Menke of Bird's Eye View GIS on 12/10/13.
[13] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
[14] Menke, 12/10/13.

Native American artifacts[15] and remains of Ice Age animals in this area.[16] The region is also an important part of the Route 66 viewshed, due to its close proximity to the route. While most of the area is included in National Conservation Lands under the Preferred Alternative, we request that the area shown in red be included as well in order to fully protect the area and its important values.

Big Maria Mountains

The Big Maria Mountains are located in Riverside County, north of Blythe. The California Wilderness Coalition surveyed the region and identified several roadless areas that are contiguous with the Big Maria Mountains Wilderness. These areas, shown in blue at left, have a combined acreage of 17,260 acres. According to the CDFW's NDD, the Big Maria Mountains area is habitat for several endangered species, including the elf owl, Gila woodpecker, gilded flicker, western yellow-billed cuckoo and Yuma clapper rail. The area is also habitat for the desert tortoise and numerous other species that are protected or of special concern.[17] The region is also noted for its cultural resources. For example, the BLM notes that "Important site complexes have been recorded on the flanks of the Big Marias and aboriginal trails are known to run into the mountains from both the east and west."[18] Furthermore, the southeastern portion of the Big Maria Mountains is less than two miles away from the famous Blythe intaglios. The Big Maria Mountains Wilderness area abuts a sizable proposed DFA proposed in the Preferred Alternative. We therefore recommend that lands in this region identified by us as qualifying for NCL designation within the Riverside East SEZ that was designated as part of BLM's Western Solar Plan (Solar PEIS) be classified as non-development zones within the SEZ. With respect to the proposed East Riverside DFA, which expands upon the original SEZ, proposed DFA boundaries should be modified to exclude any lands that qualify for NCL designation.

Bristol Lake



The Bristol Lake area, consisting of approximately 39,540 acres, is located in San Bernardino County, south of Amboy and Cadiz. According to the CDFW's NDD, this area is habitat for the cheeseweed owlfly, desert beardtongue, desert bighorn sheep, desert tortoise, Harwood's eriastrum, Mojave fringe-toed lizard, and Orocopia Mountains spurge.[19] According to the BLM, the dunes around the ancient lake bed are also home to the Mojave fringed-toed lizard.[20] The area has seven distinct plant communities. The CDFW also recognizes the area as a wildlife corridor.[21] Scientists consider the sediments in Bristol Lake to be important in determining the structural, hydrological, and paleo-climatic development of the Mojave region since the Pliocene.[22] This key natural area would

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15 http://www.jstor.org/discover/10.2307/27825521?uid=3739560&uid=2&uid=4&uid=3739256&sid=21103278388277

16 http://books.google.com/books?hl=en&lr=&id=tfUGeBLNip0C&oi=fnd&pg=PR9&dq=%22ludlow+cave%22+and+%22san+bernardino+county%22&ots=fhKXPV6r7T&sig=WGkM1HSyG52WZkdoGWo2KqumXPc#v=onepage&q=%22ludlow%20cave%22%20and%20%22san%20bernardino%20county%22&f=false

17 http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp

18 USDI-BLM, *California Wilderness Study Report*, Part 4, Volume 6, Big Maria Mountains CDCA-321, page 6.

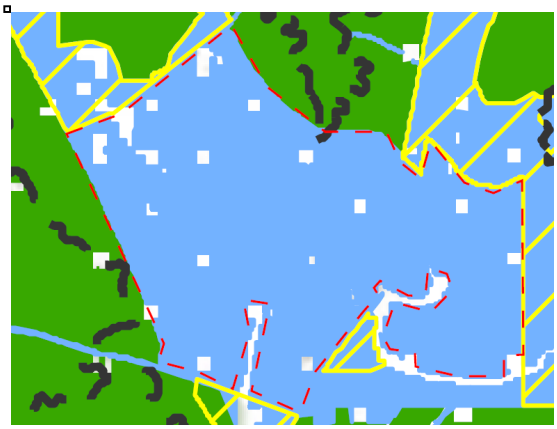
19 http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp

20 http://www.blm.gov/ca/pdfs/cdd_pdfs/fringe1.PDF

21 Menke, 12/10/13.

make an excellent addition to the NLCS and should be included as National Conservation Lands..

Cadiz Valley/Iron Mountains



The Cadiz Valley-Iron Mountains region, consisting of approximately 188,540 total acres, is located in both San Bernardino and Riverside Counties, south of the town of Cadiz. The region is undoubtedly one of the most scenic and undeveloped areas remaining in the California desert. In fact, the region includes the largest remaining unprotected roadless area in southeastern California. According to the CDFW's NDD, the Iron Mountains area is habitat for desert bighorn sheep, desert tortoise, Emory's crucifixion-thorn, Harwood's eriastrum, hepatic tanager, Mojave fringe-toed lizard and prairie falcon.[23] In 1999, a Gila monster was also seen in the area.[24] The region has 12 distinct plant communities, including wetlands, and the CDFW recognizes the area as a wildlife migration corridor.[25] Desert bighorn sheep have been found to migrate between the Iron Mountains and the Old Woman Mountains to the east, and scientists have noted the importance of maintaining this migratory path in order to ensure the continued viability of bighorn in the region.[26] Only the northern portion of the Cadiz Valley-Iron Mountain region is included in the National Conservation Lands in the Preferred Alternative. It is critically important that, with the exception of salt mines, the Colorado River Aqueduct and other developments, the remainder of this highly scenic, ecologically important and still largely wild region be included as well.

Danby Lake area

The Danby Lake area, consisting approximately 35,600 acres, is located in San Bernardino County, north/northeast of the intersection of Highways 62 and 177. The area is dominated by Danby Dry Lake. According to the CDFW's NDD, the area is habitat for desert bighorn sheep, Harwood's eriastrum, Harwood's milk-vetch, hepatic tanager, prairie falcon, slender cottonheads and small-flowered androstephium.[27] The area contains five distinct plant communities, including wetlands that are important to migratory birds. The CDFW recognizes the area as a wildlife migration corridor.[28] This region is of utmost importance to local indigenous people. This area abuts Ward Valley, a sacred area for five local Native American tribes. Ethnographic accounts tell of trails, including the "Salt Song Trail" that followed the Colorado River, passed east through the Chemehuevi Valley and connected early Native Americans with water sources at Mopah Spring and the salt mines at Danby Lake.[29] The Lake's ancient shoreline has also yielded several meteorite fragments.[30]

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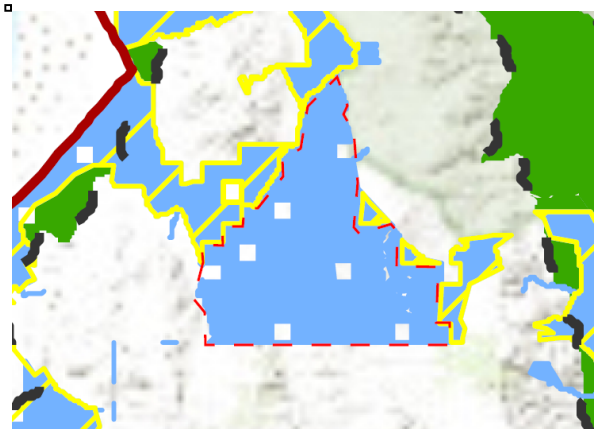
22 Michael R.Rosen, "Sedimentology, Stratigraphy, and Hydrochemistry of Bristol Dry Lake, California, USA," in EH Gierlowski-Kordesch and KR Kelts, eds., *Lake basins through space and time: AAPG Studies in Geology 46,* page 597.
23 http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
24 http://www.bioone.org/doi/abs/10.3160/0038-3872(2007)106%5B39:AHOGMH%5D2.0.CO%3B2
25 Menke, 12/10/13.
26 Epps, Clinton W., "Status of bighorn sheep in California," *Desert Bighorn Council Transactions,* Volume 47, page 24.
27 http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
28 Menke, 12/10/13.
29 http://www.scahome.org/publications/proceedings/Proceedings.24Musser-Lopez1.pdf
30 http://www.starcatching.com/mets.htm?danbydrylake

Lower Centennial Flat



Lower Centennial Flat is located in Inyo County, about 13 miles east/northeast of Olancha. According to the CDFW's NDD, Lower Centennial Flat is habitat for Joshua tree, black-chinned sparrow, Brewer's sparrow, caespitose evening-primrose, Coso Mountains lupine, Costa's hummingbird, curved-pod milk-vetch, Darwin Mesa milk-vetch, Death Valley sandpaper-plant, Dedecker's clover, desert bird's beak, golden eagle, gray cryptantha, Great Basin onion, intermontane lupine, Inyo hulsea, Inyo onion, Inyo rock daisy, King's eyelash grass, Le Conte's thrasher, Lincoln rockcress, loggerhead shrike, Mohave ground squirrel, Mojave fish-hook cactus, Mono County phacelia, Pinyon Mesa buckwheat, pinyon rockcress, prairie falcon, Tidestrom's milk-vetch, Townsend's big-eared bat, Watson's oxytheca and yellow warbler.[31] This area also provides a habitat connection for bighorn sheep populations between the Coso Range and mountain ranges to the north.[32] While Lower Centennial Flat is proposed as a Mohave ground squirrel ACEC in the DRECP it is also worthy of National Conservation Lands designation. A recent study in Joshua Tree National Park provides strong evidence that Joshua tree regeneration at higher elevations reflects the population's response to climate change (Barrows et al. 2012). Greg Suba, Conservation Program Director for the California Native Plant Society, has noted that the many young Joshua trees present throughout Centennial Flat are likely 10-15 years old and could be exhibiting a similar response to climate change, underscoring the importance of conserving Joshua tree in this transitional habitat at the northwestern periphery of its range. When TWS staff visited the region on January 17, 2015, and CalWild staff visited the area on January 28, 2015, we were struck by the significant number of young Joshua trees in the area, especially as we drew closer to the Coso Range where a mature Joshua tree forest also thrives. The Timbisha Shoshone Tribe now owns 640 acres in this area. Although the Timbisha Shoshone Tribe was federally recognized in 1983, they did not receive a land base. In 2000, the Timbisha Homeland Act was signed into law, which authorized the Secretary of Interior to take into trust over 7,000 acres of land for the Tribe, including the 640 acres at Centennial Flat. The rock group U2 photographed the area heavily and used the pictures to adorn the cover of their 1987 album, *Joshua Tree*.[33] This area was originally proposed for renewable energy and associated transmission development by Inyo County as part of its Renewable Energy General Plan Amendment (REGPA), but the County dropped its proposal due to substantial objection by the public and local tribes.

Mule Mountains

The Mule Mountains area, consisting of a total of approximately 24,580 acres, is located in Riverside County, north/northwest of Palo Verde and south/southwest of Blythe. According to the CDFW's NDD, the area is habitat for the endangered Gila woodpecker, and many other species, including Abrams' spurge, American badger, bitter hymenoxys, black-tailed gnatcatcher, burrowing owl, California leaf-nosed bat, California mellitid bee, cave myotis, Colorado River cotton rat, Colorado Valley woodrat, Couch's spadefoot, Crissal thrasher, desert beardtongue, desert tortoise, dwarf germander, Emory's crucifixion-thorn, gravel milk-vetch, Harwood's eriastrum, Harwood's milk-vetch, hoary bat, Le Conte's thrasher, loggerhead shrike, merlin, Mojave fringe-toed lizard, pallid bat, pallid San Diego pocket mouse, pink fairy-duster, prairie falcon, Townsend's big-eared bat and vermilion flycatcher.[34] The area has been

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[31] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp

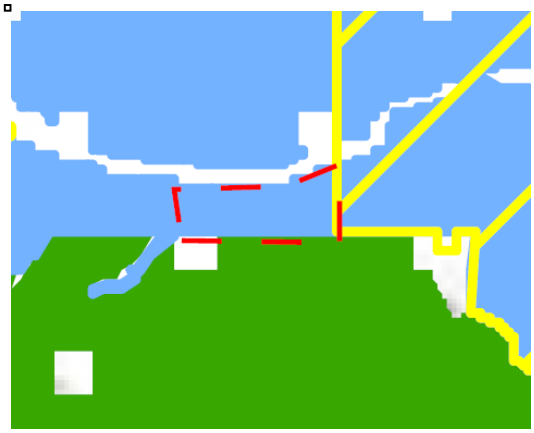
[32] While bighorn sheep have not been documented moving into and out of the Coso Range since China Lake Naval Weapons Center constructed a perimeter fence around the base after 9/11/2001, they were seen near Little Lake about ten years ago which attests to their continuing presence in the greater region. Dr. John Wehausen, pers. comm., 2/19/2015.

[33] http://basementgeographer.com/just-where-is-u2s-joshua-tree/

[34] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp

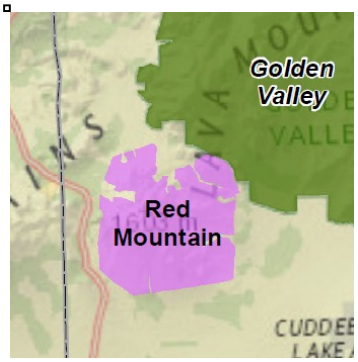
designated as critical habitat for the desert tortoise and it contains eight distinct plant communities.[35] The area also has extensive woodlands along its washes. These woodland thickets are a haven for songbirds and other creatures. There is also some evidence that bighorn sheep use the mountains.[36] Due to its remoteness, this area is also considered one of the best locations for astronomy studies in the low desert. We request that roadless portions of the Mule Mountains as described above and that overlap with the original Riverside East SEZ be classified as non-development areas within the SEZ/DFA. Any roadless portions of the Mule Mountains that are outside the original SEZ boundaries but within expanded East Riverside DFA boundaries should be excluded from the proposed DFA and managed as National Conservation Lands.

Palen-McCoy/Rice Valley



This area, consisting of approximately 23,800 acres, is located in Riverside and San Bernardino Counties, to the north of the existing Palen/McCoy Wilderness. According to the CDFW's NDD, this area is habitat for Abrams' spurge, Alverson's foxtail cactus, California leaf-nosed bat, desert bighorn sheep, desert tortoise, Emory's crucifixion-thorn, Harwood's eriastrum, Harwood's milk-vetch, Las Animas colubrine, pallid bat, prairie falcon, slender cottonheads and small-flowered androstephium.[37] The area contains seven distinct plant communities, including ecologically important ironwood thickets. The area is also recognized as a wildlife migration corridor by the CDFW.[38] While the vast majority of the region is covered by National Conservation Lands in the DRECP Preferred Alternative, if the portion indicated in red on the map above is also added to the National Conservation Lands, then the area will be fully represented in the system.

Red Mountain



The Red Mountain area is located in San Bernardino County, east of Johannesburg. According to the CDFW's NDD, the Red Mountain area is habitat for the Barstow woolly sunflower, desert cymopterus, desert tortoise, long-eared owl, Mohave ground squirrel, Mojave fish-hook cactus, and solitary blazing star.[39] The area is an important part of California's mining history. Nearby Atolia was the sight of a tungsten mine that was established in 1905 and officially ceased operations in 2007. Numerous ruins remain from this mine and other abandoned mines in the area. Red Mountain itself is largely roadless, and deserves protection given that most of the non-wilderness BLM lands in that portion of the desert are heavily roaded.

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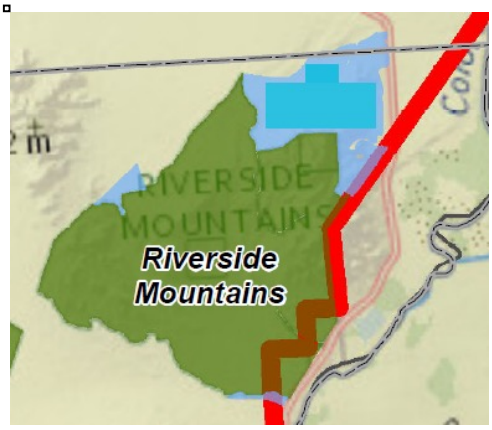
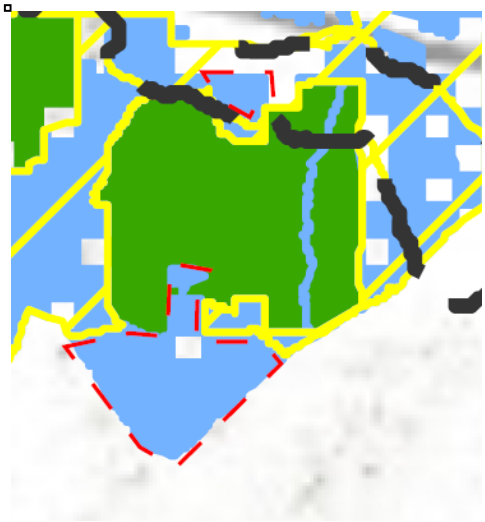
[35] Menke, 12/10/13.
[36] Clinton W Epps, "Population Processes in a Changing Climate: Extinction, Dispersal, and Metapopulation, Dynamics of Desert Bighorn Sheep in California" (Ph.D. diss., University of California, Berkeley, 2004), page 19.
[37] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
[38] Menke, 12/10/13.
[39] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp

Riverside Mountains



The Riverside Mountains area, consisting of approximately 5,360 acres, is located in both Riverside and San Bernardino Counties, north of Blythe. According to the CDFW's NDD, this area is habitat for several endangered species -- the elf owl, Gila woodpecker, and western yellow-billed cuckoo.[40] The area is also habitat for the American badger, California barrel cactus, California leaf-nosed bat, cave myotis, Crissal thrasher, desert tortoise, elf owl, foxtail cactus, gilded flicker, prairie falcon, Townsend's big-eared bat, pallid bat, vermillion flycatcher, and white desertsnail.[41] The area contains seven distinct plant communities.[42] This area's close proximity to the Colorado River increases the probability that it possesses critical cultural resources. CalWild identified a roadless area contiguous with the existing Riverside Mountains Wilderness and we request that the BLM include the roadless area (shown here in blue) in the National Conservation Lands.

Rodman Mountains



The Rodman Mountains area, consisting of a total of approximately 18,400 acres, is located in San Bernardino County, south/southeast of Newberry Springs. According to the CDFW's NDD, the Rodman Mountains area is habitat for Boyd's monardella, creamy blazing star, Darlington's blazing star, desert bighorn sheep, desert tortoise, golden eagle, Mojave menodora, Mojave monkeyflower, prairie falcon and purple-nerve cymopterus.[43] This area is designated critical habitat for the desert tortoise and is recognized as a wildlife migration corridor by the CDFW.[44] It also contains nine distinct plant communities.[45] The Rodman Mountains are an extremely important stronghold for the imperiled desert tortoise. Desert tortoise population surveys found a density of 3.8 tortoises per square kilometer in the Rodman Mountains in 2008.[46] This was the fourth highest population density found of the 17 sites sampled in the Mojave Desert (densities in the 17 sites ranged from five per square kilometer to 0.4).[47] In 2009, the Rodman Mountains were found to have a population density of 7.1 tortoises per square kilometer, which was the fifth highest of the 15 sites sampled in the Mojave Desert.[48] CalWild staff visited this area in early 2014 and encountered petroglyphs there. While the vast majority of the region is covered by National Conservation Lands in the DRECP Preferred Alternative, if the portion indicated in red on the map above is also added to the National Conservation Lands, then the area will be fully represented in the system.

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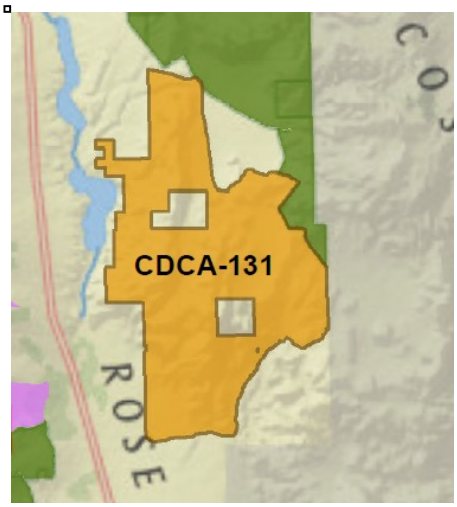
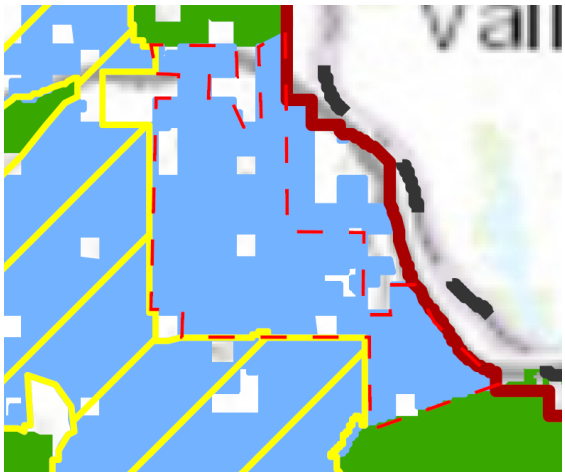
40 Ibid.
41 Ibid.
42 Menke, 12/10/13.
43 http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
44 Menke, 12/10/13.
45 Ibid.
46 USFWS, Range-Wide Monitoring of the Mojave Desert Tortoise (gopherus agassizii): 2008 AND 2009, Reporting Prepared by Linda Allison, Desert Tortoise Monitoring Coordinator, September, 2012, page 57.
47 Ibid.
48 USFWS, page 58.

Rose Valley/McCloud Flat



The Rose Valley/McCloud Flat area is located in Inyo County, north of Little Lake. The BLM surveyed this area and determined it to have wilderness characteristics. According to the CDFW's NDD, the area is habitat for the endangered Owens Valley checkerbloom, Amargosa beardtongue, American badger, black-tailed gnatcatcher, Booth's evening-primrose, Brewer's sparrow, burrowing owl, Coso Mountains lupine, Costa's hummingbird, creamy blazing star, Darwin Mesa milk vetch, desert bighorn sheep, desert bird's-beak, desert tortoise, golden eagle, gray cryptantha, Kern Canyon clarkia, Kern ceanothus, Le Conte's thrasher, loggerhead shrike, Mohave ground squirrel, northern harrier, northern sagebrush lizard, Owens Valley vole, pallid bat, Panamint kangaroo rat, Pinyon Mesa buckwheat, prairie falcon, San Emigdio blue butterfly, sanicle cymopterus, silver-haired bat, Swainson's hawk, Townsend's big-eared bat, winged cryptantha and Wong's springsnail.[49] Scholarly reports conclude that the introduction of the bow and arrow to North American indigenous people likely occurred in the Rose Valley area.[50] Similar to the Coso Range, the Rose Valley area constitutes an extremely significant cultural landscape, with many important cultural and historical resources and sites. Fossil Falls was once a major village site for local tribes, with much evidence of occupation remaining today, and the Little Lake-Fossil Falls area is probably the densest site for Indian rock art in the Highway 395 corridor. While the majority of the area shown in yellow as CDCA-131 at left is covered by National Conservation Lands in the DRECP Preferred Alternative, we request that appropriate additional portions of the area be included as well to better protect its superlative values.

Sacramento Mountains



The Sacramento Mountains are located in San Bernardino County, south/southwest of Needles. The region is noted for its fascinating rock formations and diverse terrain. Despite their proximity to Needles and the Colorado River and the presence of four-wheel drive routes in the area, the Sacramento Mountains are still somewhat undiscovered by visitors. While the area is accessed by vehicle routes, CalWild identified six roadless areas in the Sacramento Mountains with a combined size of 81,570 acres. According to the CDFW's NDD, this area is habitat for the endangered Arizona Bell's vireo, Gila woodpecker,[51] desert bighorn sheep, desert tortoise, Le Conte's thrasher, mountain plover, narrow-leaved psorothamnus, pallid bat, prairie falcon, spiny-hair blazing star, vermilion flycatcher and yellow-breasted chat.[52] A portion of the region has also been designated critical habitat for the desert tortoise.[53] While the majority of the region is covered by National Conservation Lands in the DRECP Preferred Alternative, if the portion indicated in red on the map above is also added to the National Conservation Lands, then this unique and deserving area will be fully represented in the system.

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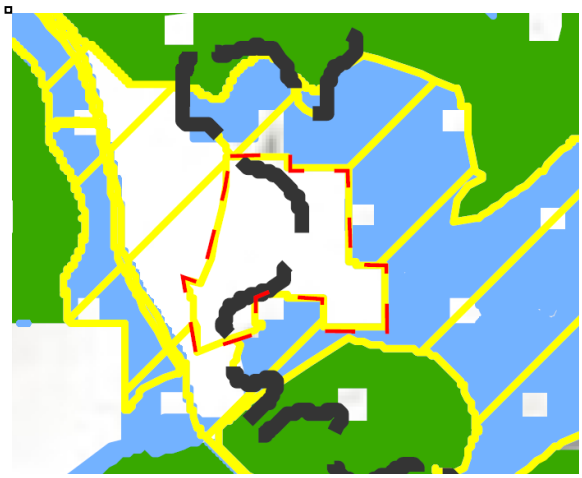
[49] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
[50] Yohe, Robert M., "THE INTRODUCTION OF THE BOW AND ARROW AND LITHIC RESOURCE USE AT ROSE SPRING (CA-INY-372)," *Journal of California and Great Basin Anthropology,* Vol. 20, No. 1, pp. 26-52 (1998).
[51] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
[52] Ibid.
[53] Menke, 12/10/13.

Silurian Valley/Kingston Range/Silurian Hills



The Silurian Valley/Kingston Range/Silurian Hills region is located in San Bernardino County, south of Dumont Dunes OHV Area and east of Highway 127. According to the CDFW's NDD, species that have habitat in this area include the Amargosa Canyon speckled dace, Amargosa pupfish, black-tailed gnatcatcher, Borrego milk-vetch, Brewer's sparrow, burrowing owl, California horned lark, Clark Mountain buckwheat, desert bighorn sheep, desert pincushion, desert tortoise, golden eagle, Great Basin onion, Le Conte's thrasher, loggerhead shrike, Mojave fringe-toed lizard, New York Mountains cryptantha, pallid bat, Providence Mountains milk-vetch, ribbed cryptantha, small-flowered androstephium, Tidestrom's milk-vetch, white bear poppy and winged cryptantha.[54] Silurian Valley provides an essential hydrologic link in the Amargosa Watershed. Salt Creek drains the extensive basin formed by Silurian Valley, capturing relatively high amounts of run-off from the entire south and west slopes of the Kingston Range (through Kingston Wash) and the east face of the very high Avawatz Mountains. The relatively large amount of water flowing through the aquifers here becomes apparent at the large and well-watered Salt Spring. Only a few miles below Salt Spring, Salt Creek meets the Amargosa River on its journey to Death Valley. Designating this region as National Conservation Lands would protect the critical hydrologic resources of the Amargosa watershed. Furthermore, the Silurian Valley is now something that is quite rare: A relatively undisturbed California desert landscape. From the Boulder transmission lines in the south to Ibex Pass in the north, there are few signs of modern industrial development. The Old Spanish Trail also passed through Silurian Valley. This Trail is an important part of our nation's history. The Old Spanish Trail became the fifteenth national historic trail when Congress adopted it and President George W. Bush signed the bill in December, 2002. The Old Spanish Trail linked two provinces of Mexico, separated by such difficult topography and climatic extremes that, despite attempts beginning as early as 1776, a route was not successfully opened until 1829.[55] This route was then combined with other existing routes, thus opening up a trade route between Santa Fe and Los Angeles, thus making feasible international trade between the United States and Mexico via Santa Fe.[56] While the majority of the region is covered by National Conservation Lands in the DRECP Preferred Alternative, if the portion indicated in red on the map above is also added to the National Conservation Lands, then this scenic, ecological and cultural jewel will be fully represented in the system. A decision to add these lands to BLM's National Conservation Lands will also be consistent with BLM's recent decision to deny a variance application for solar development in this area due to its superlative values.

Valley Mountain

The Valley Mountain area, consisting of approximately 15,060 acres, is located in San Bernardino County, northeast of Twentynine Palms. According to the CDFW's NDD, species that have habitat in the area include the burrowing owl and desert tortoise.[57] The region has six distinct plant communities, which include the barrel cactus

[54] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
[55] http://www.oldspanishtrail.org/learn/trail_history.php
[56] Ibid.
[57] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp

and smoke trees.[58] The area is in a rapidly-urbanizing region with a very high average road density. Valley Mountain and the adjacent Cleghorn Lakes Wilderness form an island of roadless open space that can help to serve as a wildlife connection between protected areas such as the Pinto Mountains Wilderness and Joshua Tree National Park to the south.

Vidal

The Vidal area, consisting of approximately 7,520 acres, is located in San Bernardino County, west of Parker. According to the CDFW's NDD, the area is habitat for the endangered Yuma clapper rail and the endangered western yellow-billed cuckoo.[59] It is also habitat for the American badger, and desert tortoise.[60] CalWild's surveyor witnessed about a dozen burro deer in the area when he visited. The area is designated critical habitat for the desert tortoise and it contains four distinct plant communities.[61] One can also find ecologically-significant ironwood thickets in some of this area's many washes. These woodlands teem with songbirds (including the beautiful western bluebird) and other life. The area's close proximity to the Colorado River increases the probability that it contains important cultural resources. As the only roadless area between the Whipple Mountains Wilderness and Riverside Mountains Wilderness, Vidal can help to provide habitat connections in an increasingly fragmented region.

Whipple Mountains

The Whipple Mountains area, consisting of a total of approximately 103,670 acres, is located in San Bernardino County, northwest of Parker. CalWild staff surveyed the region and identified eleven roadless areas that are either near, or adjacent to, the existing Whipple Mountains Wilderness. According to the CDFW's NDD, the area is habitat for several endangered species, including the Arizona bell's vireo, California black rail, elf owl, Gila woodpecker, gilded flicker, western yellow-billed cuckoo and Yuma clapper rail.[62] The area also provides habitat for the American badger, bald eagle, Bendire's thrasher, brown-crested flycatcher, California leaf-nose bat, cave myotis, Colorado River cotton rat, Colorado Valley woodrat, Crissal thrasher, desert bighorn sheep, desert tortoise, loggerhead shrike, northern cardinal, pallid bat, Townsend's big-eared bat, vermillion flycatcher, western mastiff bat, white desert snail, yellow-breasted chat and Yuma myotis.[63] The Whipple Mountains provide superior nesting and foraging habitat for several raptors including the prairie falcon, golden eagle, red-tailed hawk, and Cooper's hawk.[64] Most of the eleven roadless areas units in this region are critical habitat for the desert tortoise.[65] The CDFW also recognizes this area as a wildlife migration corridor.[66] The region hosts many types of plants and plant communities, including Abrams' spurge, Arizona pholistoma, Aven Nelson's

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58 Menke, 12/10/13.
59 http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
60 Ibid.
61 Menke, 12/10/13.
62 http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp
63 Ibid.
64 California BLM description of Whipple Mountains Wilderness http://www.blm.gov/ca/st/en/fo/needles/wilderness/whipple_mountains.html
65 US Fish and Wildlife Service Critical Habitat portal http://ecos.fws.gov/crithab/
66 Menke, 12/10/13.

phacelia, bare-stem larkspur, bitter hymenoxys, Cove's cassia, creosote bush scrub, Darlington's blazing star, desert beardtongue, desert pincushion, Emory's crucifixion-thorn, glandular ditaxis, iron wood, Kofa barberry, palo verde, smoke tree, small-flowered androstephium, spear-leaf matelea, spiny-hair blazing star, wand-like fleabane daisy, and many types of cactus, Arizona fishhook, foxtail, prickly pear, saguaro and Wiggins' cholla.[67] Several portions of this area extend into the Chemehuevi Valley, known ancestral land for early Native Americans. The area encompasses some of the Chemehuevi Valley and is very close to the Colorado River and the Colorado River Reservation. Ethnographic accounts tell of trails, including the "Salt Song Trail" that followed the Colorado River and passed through the Chemehuevi Valley.[68] Ethnographies suggest as many as four trails traversed these lands and went directly through the Whipple Mountains from the Turtle Mountains to the Colorado River.[69] Several trails over the Whipples from Chemehuevi Valley to Parker have been described by Native American tribal members in interviews.[70] A portion of the Whipple Mountains is designated as an ACEC and, according to the BLM's 1989 description, "The area contains a large series of sensitive cultural resources."[71] A private report lists the following cultural resources found within the ACEC: rock shelters, caves, trails, and habitation sites, as well as mythological and religious sites important to the Mohave.[72] While the majority of the region is covered by National Conservation Lands in the DRECP Preferred Alternative, if the portions indicated in red on the map above are also added to the National Conservation Lands, then this critically important wild land will be fully included in the system.

White Mountains/Deep Springs Valley

This area incorporates the lower eastern slopes of the White Mountains that abut remote Deep Springs Valley. While the BLM has recommended some portions of this area for National Conservation Lands, including Antelope Spring, other areas surveyed by BLM were not recommended for National Conservation Lands designation. We believe additional public lands in this area should be recommended. At a minimum, additional National Conservation Lands should include White Mountain City: historic mining ruins with petroglyphs indicative of previous Native American occupation,[73] and any additional habitat for the threatened black toad that is on public lands.

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[67] http://imaps.dfg.ca.gov/viewers/cnddb_quickviewer/app.asp

[68] Musser-Lopez, Ruth Arlene and Steve Miller, ARCHAEOLOGICAL TRAILS AND ETHNOGRAPHIC TRAILS: CAN THEY MEET?, SCA Proceedings, Volume 24, 2010, pages 6, 7, 8.

[69] Ibid, p. 13.

[70] James E. Snead, Clark L. Erickson, J. Andrew Darling, Landscapes of Movement, 2009, Pages 95-97

[71] https://archive.org/details/areasofcriticale33unit

[72] Kaldenberg, Russell L., A CONSTRAINTS STUDY OF CULTURAL RESOURCE SENSITIVITY WITHIN THE CALIFORNIA DESERT, 2008.

[73] http://www.ghosttowns.com/states/ca/whitemountaincity.html

White Mountains/Deep Springs Valley
Lower Centennial Flat
Rose Valley/McCloud Flat
93
15
95
Silurian Valley/Kingston Range/Silurian Hills
red mountain ca
Rodman Mountains
ash hill
Lake Danby
Sacramento Mountains
40
Cadiz Valley/Iron Mountains
argos
Whipple Mountains
Vidal
605
215
Valley Mountain ca
Riverside Mountains ca
10
405
Palen-McCoy/Rice Valley
Bristol Lake
Big Maria Mountains
Mule Mountains
805
8
1
2
5
3
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community, Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors

ATTACHMENT B

September 24, 2013

Principal Deputy Director Neil Kornze
Bureau of Land Management
1849 C Street NW, Rm. 5665
Washington, DC 20240

Re: Additions to the National Conservation Lands through the Desert Renewable Energy Conservation Plan

Dear Director Kornze,

As members of the Friends Grassroots Network and the Conservation Lands Alliance, we are writing to express our strong support for identifying and adding lands in the California Desert Conservation Area to the National Conservation Lands. The Friends Grassroots Network is a collection of 50 organizations across the nation working to protect, promote and expand the National Conservation Lands. We work in local communities on a wide array of natural and cultural resource issues in and around the National Conservation Lands. The Conservation Lands Alliance is a coalition of more than eighty conservation, historic preservation, faith-based, recreation, business, and place-based friends groups representing millions of Americans nationwide. It is the vision of the Conservation Lands Alliance that our National Conservation Lands, are well-funded, managed for conservation as a priority, and expanded to include all of BLM's important and spectacular conservation areas.

These issues are diverse and a sampling of our activities includes: educational outreach for schools, monitoring recreational shooting, wilderness advocacy, off-road vehicle and travel management, restoration of riparian zones, wet and dry mapping of aquatic resources, trail system development, maintenance, and restoration, site stewardship of important archeological resources, scientific exploration, and ecological interpretation for the general public. While this constitutes just a snapshot of our collective work, the numbers indicate the scope and reach of our commitment; in 2012 alone, we collectively logged more than 112,000 hours of volunteer work from over 2,100 volunteers nationally, contributing more than $3 million worth of labor. Thus, we are deeply devoted to the quality and longevity of the National Conservation Lands.

We believe that many areas within the California Desert are nationally significant and worthy of long-term protection. The 2009 Omnibus Public Land Management Act, which permanently established the National Conservation Lands, also states that this new system would include "public land within the California Desert Conservation Area administered by the Bureau of Land Management for conservation purposes." We understand that BLM, though the Desert Renewable Energy Conservation Plan, is currently identifying which lands within the California Desert should be managed to conserve natural, scenic, cultural and historic resources as part of the Conservation Lands and which lands will be managed for renewable energy development and other non-conservation purposes.

In preliminary documents, the BLM has indicated that of the 10 million acres it manages in the California Desert Conservation Area, a range of 1.7 to 5.4 million acres will be added to the National Conservation Lands. The California Desert is a unique, fragile and irreplaceable ecosystem essential for protecting endangered species, providing connectivity between areas important for wildlife, protecting historic, scenic and cultural resources, and preserving wilderness. We encourage the BLM to protect the maximum amount of acres indicated.
The National Conservation Lands are a spectacular collection of American landscapes, rivers and trails. They are the crown jewels of BLM and offer the visitor the chance to experience the beauty, history and adventure of the American West. Lands in the California Desert are worthy of inclusion within the National Conservation Lands. We urge you to protect these lands and the many community benefits that are derived from the region's natural, cultural and recreational resources.

Thank you for your time and consideration.

Sincerely,

Cc: Carl Rountree
James Kenna

Brian O'Donnell, Executive Director
Conservation Lands Foundation

Nada Culver, Director and Senior Council, BLM Action Center
Sally Miller, Senior Regional Conservation Representative California
The Wilderness Society

Johanna H. Wald, Senior Counselor
Natural Resources Defense Council

Lisa Belenky, Senior Attorney
Center for Biological Diversity

Thomas J. Cassidy, Jr., Vice President for Government Relations and Policy
National Trust for Historic Preservation

Kelly Burke, Executive Director
Grand Canyon Wildlands Council, (AZ)

John Robinson, Public Lands Director
Idaho Conservation League (ID)

Dan Randoph, Executive Director
San Juan Citizens Alliance (CO)

Les Corey, Executive Director
Arizona Wilderness Coalition (AZ)

Michael J. Painter, Coordinator
Californians for Western Wilderness (CA)

Dave Willis, Chair
Soda Mountain Wilderness Council (OR)

David Miller, Board President
Friends of Big Morongo Canyon Preserve (CA)

LeAnn Skrzynski, Executive Director
Citizens for Dixies Future (UT)

Martie Maierhauser, Chairman
Cienega Watershed Partnership, (AZ)

Diane McBride, Director
Southwest Colorado Canyons Alliance (CO)

Henrietta Stern, President
Fort Ord Recreational Trails (FORT) (CA)

Sungnome Madrone, Executive Director
Mattole Salmon Group (CA)

Tasha McKee, Executive Director
Sanctuary Forest (CA)

Cassie Purnell, Executive Director
Mattole Restoration Council (CA)

John Purcell, Executive Director
Friends of the Desert Mountains (CA)

Connie Candelaria, President
The Paleozoic Trackways Foundation (NM)

Cheryl Lisin, Board President
Lost Coast Interpretive Association (CA)

Ann Cole, Executive Director
Mendocino Land Trust (CA)

Lucas Herndon, Executive Director
Friends of the Organ Mountains-Desert Peaks (NM)

Dan Morse, Acting Executive Director
Oregon Natural Desert Association (OR)

Nancy Hall, Director
Friends of Gold Butte (NV)

Carla Kerekes Martin, Vice- President
Empire Ranch Foundation (AZ)

Ryan Henson, Senior Policy Director
California Wilderness Coalition (CA)

Chris Meachum, President
Friends of Saddle Mountain (AZ)

Maggie Sacher, President
Friends of the Cliffs (AZ)

Sharon Baur, President
Friends of the Joshua Tree Forest (AZ)

Lee-Ann Hill, Program Coordinator
Dolores River Boating Advocates (CO)

Roger Cole, Executive Director
Grand Staircase-Escalante Partners (UT)

Sarah Sauter, Executive Director
Western Slope Conservation Center (CO)

Pat Williams, Communications Director
Friends of Red Rock Canyon (NV)

Tom Sobal, Executive Director
Friends of Browns Canyon (CO)

Terri Robertson, President
Friends of Sloan Canyon (NV)

Sara Dawn Husby-Good, Executive Director
Tuleyome (CA)

Mark Meloy, President
Friends of Cedar Mesa (UT)

Jamie Stuve, President & CEO
Loxahatchee River Historical Society (FL)

Robert Weissler, Director
Friends of the San Pedro River (AZ)

Joe Neuhof, Executive Director
Colorado Canyons Association (CO)

Deborah J. Gangloff, Ph.D., President & CEO
Crow Canyon Archeological Center (CO)

David Caledonian, President
FOBBITS (Friends of the Oregon Badlands) (OR)

Karen Dallett, Executive Director
Friends of Black Rock-High Rock (NV)

Lahsha Brown, Executive Director
Friends of Ironwood Forest (AZ)

John Corcoran, Board President
Fort Stanton Cave Study Project (NM)

Beth Kampschror, Executive Director
Friends of the Missouri Breaks National Monument (MT)

Karen LaFrance, President
Friends of the Agua Fria National Monument (AZ)

Sandy Rode, Board President
Friends of the Sonoran Desert National Monument (AZ)

Robert Orr, President
Snake River Raptor Volunteers (ID)

Sharron Netherton, Executive Director
Friends of Nevada Wilderness (NV)

ATTACHMENT C

Christopher M. Carrillo

Attorney at Law

February 9th, 2015

The Honorable Secretary Jewell
United States Department of the Interior
1849 C Street, N.W.
Washington D.C., 20240

Dear Secretary Jewell,

On behalf of the 40 business, community and elected leaders listed below, we want to thank you and your staff for your dedicated work the past five years drafting the Desert Renewable Energy Conservation Plan (DRECP). In particular, San Bernardino County leaders appreciate BLM California State Director Jim Kenna's September 2013 visit and participation in public meetings in Lucerne Valley and Yucca Valley, two desert communities that could be impacted by future development under this plan.

As you know the DRECP involves large scale planning for renewable energy development, conservation and recreation on 22 million acres in California's desert, *half of that area acreage within San Bernardino County*. As a result, many elected officials and civic leaders feel compelled to weigh in on this plan that will undoubtedly impact the future of San Bernardino County, we hope for the better.

First, it is critical that the DRECP minimize impacts from utility-scale industrial renewable energy development on San Bernardino County neighborhoods. Large-scale solar and wind farms may have a place in the desert, just not immediately adjacent to residential neighborhoods. The depreciation of property values that industrial development of this nature has on communities and the disruption in the quality of life of residents should be thoughtfully considered. In particular, the "Development Focus Area" (DFA) or priority renewable energy zone proposed in all five DRECP alternatives surrounding Apple Valley, Victorville, Hesperia and centered in Lucerne Valley and Johnson Valley should be removed or significantly reduced due to the impact on the

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thousands of residents who live in the High Desert. Some southern California communities support development within the planning area while others do not. We think it is important that the communities with a vision to build alongside development should be prioritized for DFA's.

Second, California's Mojave Desert is one of the crown jewels of the American West. It is inclusive of three National Parks, stunning wilderness and open spaces leading National Geographic to deem it one of the "World's 100 Most Beautiful Places." The Mojave attracts tourists from around the world and is a significant driver of San Bernardino County's regional tourism economy. Joshua Tree National Park alone last year saw 1.4 million visitors contributing $63 million to the Morongo Basin economy. It is also home to the 'Mother Road' Route 66, which is driven by tourists from around the world and which plays a vital role in the City of Barstow's local economy. We think it is crucial, when overlaying the vision for DRECP on our desert to minimize renewable energy development near our scenic highways and sacred National Parks.

As you know, the conservation legacy of the California Desert is far from complete. The Omnibus Public Lands Management Act of 2009 (Public Law 111-11) directed the BLM to meet the public's heightened interest in conservation of lands in the California Desert for habitat connectivity, potential mitigation for renewable energy development and transmission and innovative education and interpretation of natural, cultural and historic resources. Section 202 (b) (2) (D) states that the Act designates as part of the National Conservation Lands, "public land within the California Desert Conservation Area (CDCA), administered by the Bureau of Land Management for conservation purposes." Thus, it is important that the BLM use this opportunity to protect all qualified lands as units of the National Conservation Lands, in accordance with PL 111-11, Secretarial Order 3308, and Section 601. Prioritizing new National Conservation Lands and safeguarding those designated lands from development will be important to protecting our growing national and international tourist base and to conserving iconic desert landscapes for future generations to enjoy.

Finally, San Bernardino County is nationally renowned for its recreational opportunities. We endorse a DRECP alternative that protects recreational opportunities from development. Through Senator Feinstein and Congressman Cook's leadership they succeeded in legislative measures this past year to protect the Johnson Valley Off Highway Vehicle Recreation Area from renewable energy development and we expect the same with a balanced DRECP alternative that protects San Bernardino County's coveted recreational spaces.

In the end, we support a plan that minimizes utility scale renewable energy development impacts to residential neighborhoods and public lands, prioritizes National Conservation Lands and protects our recreational areas, all significant drivers to our local

economy. A plan that balances those interests while finding appropriate places for renewable energy development is one that can best benefit San Bernardino County and its residents. Thank you for your time and consideration of this matter.

Sincerely,

Chris Carrillo

San Bernardino County Elected/Business/Civic Leaders

1. Randy Coleman, Former *First District San Bernardino Co. Planning Commission*
2. George Huntington, Mayor *Town of Yucca Valley*
3. Dr. Robert Lombardo, Councilman *Town of Yucca Valley*
4. Bill Holland, Mayor Pro Tem *City of Hesperia*
5. Mike Leonard, Councilman *City of Hesperia*

6. Russ Blewett, Councilman *City of Hesperia*
7. Paul Russ, Councilman *City of Hesperia*
8. Dawn Rowe, Former Councilwoman *Town of Yucca Valley*
9. Jim Harris, Former Councilman *City of Twentynine Palms*
10. Beverly Lowry, President Board of Directors *Mojave Water Agency*

11. Victoria Fuller, Board of Directors *Joshua Basin Water District*
12. Rebecca Unger, Board of Directors *Joshua Basin Water District*
13. Greg Gilbert, Board Member *Copper Mountain College*
14. Karalee Hargrove, Board Member *Morongo Unified School District*
15. Mark Butler, Former Superintendent *Joshua Tree National Park*

16. David Myers, Executive Director *The Wildlands Conservancy*
17. Dennis Schramm, Former Superintendent *Mojave National Preserve*
18. Chuck Caplinger, Former Planning Commissioner *City of Twentynine Palms*
19. Marina West, General Manager *Bighorn-Desert View Water Agency*
20. Donna Munoz, General Manager *Morongo Valley CSD*

21. Thomas Fjallstam, President *Joshua Tree Chamber of Commerce*
22. Chuck Bell, President *Lucerne Valley Economic Development Association*
23. Linda Gonzalez, President *Hispanic Inland Empire Chamber of Commerce*
24. Kathie Thurston, Executive Director *Redlands Chamber of Commerce*

25. Pam Scannell, Executive Director *Big Bear Chamber of Commerce*
26. Eva Soltes, Past President *Joshua Tree Chamber of Commerce*
27. Jim Lawless, Past President *Yucca Valley Chamber of Commerce*
28. Dave Caretto, Mayor *City of Big Bear Lake*
29. Bill Jahn, Mayor Pro Tem *City of Big Bear Lake*
30. Randall Putz, Councilman *City of Big Bear Lake*

31. Bob Jackowski, Councilman *City of Big Bear Lake*
32. Liz Harris, Former Mayor *City of Big Bear Lake*
33. Jon Harrison, Mayor Pro Tem *City of Redlands*
34. Paul Barich, Councilman *City of Redlands*
35. Pat Gilbreath, Councilwoman *City of Redlands*

36. Lorrie Steely, Founder *Mojave Communities Conservation Collaborative*
37. Terry Kostak, President *Oak Hills Property Owners Association*
38. Monica Argandona, Southern California Conservation Director *California Wilderness Coalition*
39. David Lamfrom, Associate Director California Desert *National Parks Conservation Association*
40. Frazier Haney, Conservation Director *Mojave Desert Land Trust*

ATTACHMENT D

February 23, 2015

Director Neil Kornze
Bureau of Land Management
1849 C Street NW
Washington, DC 20240

Dear Director Kornze,

As California members of the Friends Grassroots Network, we are writing to express our strong support for identifying and adding lands in the California Desert Conservation Area to the National Conservation Lands as part of Desert Renewable Energy Conservation Plan (DRECP). The Friends Grassroots Network is a collection of more than 50 organizations across the nation working to protect, promote and expand the National Conservation Lands.

We applaud the BLM's staff for their tireless work in putting together this Land Use Plan Amendment that is complex and takes into consideration such a large landscape. We believe that planning in the desert is crucial as it faces changes such as energy development, population growth, and increased impacts from recreation.

The preferred alternative for the DRECP would add 3.52 million acres of new National Conservation Lands. While we applaud the effort of BLM to identify and expand the National Conservation Lands in the California Desert, the proposed management guidance does not meet the established standards for conservation in the National Conservation Lands. Compounding this weak policy language is a lack of clarity on the permanence of such protections.

The BLM has made enormous strides in recent years in establishing coherent, meaningful conservation policies for National Conservation Lands. The members of the Friends Grassroots Network have advocated for these improved policies, and believe that consistent application of these policies is best for the effective management of the National Conservation Lands. Therefore, we suggest the following improvements.

Permanent Protection for the California Desert - As part of Public Law 111-11, Congress directed the BLM to determine which lands in the CDCA were to be managed for conservation and added to the National Conservation Lands. However, the BLM has taken the position that lands identified for conservation as part of the DRECP can be undesignated through a future administrative process. This is inconsistent with Public Law 111-11 and threatens the success of the DRECP.

Management Standards for Additions to the National Conservation Lands – Currently all new additions to the National Conservation Lands have several basic conservation

standards including: 1) a prescriptive focus on managing for conservation; 2) a prohibition on discretionary uses that are not consistent with conservation; 3) a mineral withdrawal; and 4) restrictions on off-road vehicles and a travel management plan with restrictions necessary to protect the area. In addition, the BLM has instituted national policy standards for managing the National Conservation Lands including BLM's 15-Year Strategic Plan and conservation manuals. These policies should be taken seriously and implemented with greater purposefulness in any additions to the National Conservation Lands.

In the preferred alternative for the DRECP there are two issues, which do not meet current management standards- "disturbance caps" and the lack of a mineral withdrawal. Allowing new mineral claims and other unspecified disturbances threatens to undermine the entire system by subjecting the California desert to a weaker set of management standards.

In summary, over the past several years, the BLM has made great strides in embracing and strengthening the National Conservation Lands. Without changes that bring management of the California Desert in line with current policy for other National Conservation Lands, conservation policy that BLM has worked so hard to implement would be diluted. The BLM should re-examine the proposed management language and ensure permanent protection for the California desert additions to the National Conservation Lands.

Thank you for your time and consideration.

Sincerely,

California Members of the Friends Grassroots Network

John Purcell
Friends of the Desert Mountains

Cassie Pinnell
Mattole Restoration Council

Sungnome Madrone
Mattole Salmon Group

Laura Beardsley
Friends of the Inyo

Reed Holderman
Sempervirens Fund

Sara Husby
Tuleyome

Cheryl Lisin
Lost Coast Interpretive Association

Frazier Haney
Mojave Desert Land Trust

Patrick Donnelly
Amargosa Conservancy

Henrietta Stern
FORT Friends

Jeff Hunter
Bodie Hills Conservation Partnership

Neil Havlik
Carrizo Plain Conservancy