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N16 (PWR-NR)

February 23, 2015

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



To Whom It May Concern:

The National Park Service (NPS) appreciates the opportunity to provide comments on the Desert Renewable Energy Conservation Plan (“the Plan”) Draft Environmental Impact Statement (Draft EIS). The NPS holds in public trust one sixth of the lands within the Plan area, and manages those lands under a strategy of resource stewardship consistent with its directives from Congress. In meeting its mission, the NPS also acts as an active conservation partner with other agencies and organizations. The NPS supports efforts by the Department of the Interior and the State of California to advance smart development of renewable energy. The NPS encourages the Renewable Energy Action Team (REAT) agencies to ensure that renewable energy projects are sited, designed, constructed, and operated in an environmentally responsible manner that serves the public interest, protects cultural and natural resources, and protects our treasured landscapes.

The NPS commends the REAT agencies for developing a vision of desert conservation to enhance and support the conservation goals of the California Desert Protection Act, including enhanced ecosystem connectivity and resilience. The Bureau of Land Management’s (BLM) Land Use Planning Amendment and the Conservation Planning Areas could add new resource protection measures to the management of millions of acres, and enhance landscape-level connectivity needed to maintain the unique ecosystems and cultural landscapes within the Plan area now and into the future.

After review of the Draft EIS, the NPS requests further clarification and consideration of several issues, including: land designations, NPS resource impacts, compensatory mitigation coordination, durability of conservation, and the NPS role in implementation. Moreover, the NPS encourages the lead federal agencies to implement an inclusive and transparent process as they initiate consultation under Section 106 of the National Historic Preservation Act.

Because of the complex nature of the Draft EIS and the many elements within each alternative, the NPS understands that the Final EIS and the Record of Decision will likely identify an alternative that is somewhat different from any of the alternatives proposed in this Draft. Accordingly, the NPS has commented on elements of concern and proposed protections within several alternatives, rather than expressing support for any one of the existing action alternatives as presented in the Draft EIS. The NPS recommends the REAT agencies use these recommendations to develop a composite Preferred Alternative. NPS comments are attached in two formats: general comments on the overall framework of the DRECP, and a matrix of comments tied to specific content in the documents.

The NPS appreciates our ongoing coordination with the REAT agencies and looks forward to continued mutually beneficial participation in the planning and implementation processes. If you have any questions regarding our comments or need additional information, please contact Lara Rozzell at [lrozzell@nps.gov](mailto:lrozzell@nps.gov) or at (415) 623-2205.

Sincerely,



Christine S. Lehnertz 23 FEB 2015

Attachments (2)

## **National Park Service General Comments on the Desert Renewable Energy Conservation Plan (DRECP) Draft Environmental Impact Statement (EIS) and Supporting Documents**

The National Park Service (NPS) supports the conservation vision of the Renewable Energy Action Team (REAT) agencies and the landscape-scale approach for planning renewable energy siting. The proposed Areas of Critical Concern and National Conservation Lands designations on lands administered by the Bureau of Land Management (BLM) and the identified Conservation Planning Areas hold great promise for landscape-scale conservation. The NPS looks forward to close collaboration on landscape conservation with the REAT agencies as the DRECP is implemented.

NPS has submitted some comments in duplicate, referenced to different portions of the document. We intend for the duplication to help in categorizing our comments and assigning them to the appropriate planning team members so they can be effectively considered. However, we recognize that the length and complexity of the Draft EIS will still make it difficult to ensure our comments all reach the appropriate subject matter experts on the planning team, and we therefore request to work actively with the REAT agencies and EIS contractor team to ensure that comments reach the appropriate subject matter experts and decisionmakers for effective consideration and incorporation into the Plan.

The NPS identified a number of areas in the Draft EIS, the draft Implementation Agreement, and the Draft Durability Agreement on which we provide comments for further REAT agency consideration, and we have also identified areas that could benefit from additional clarity in order to realize the full promise of the Plan. Our recommendations on the document have focused in five areas: land designations, NPS resource<sup>1</sup> impacts, compensatory mitigation coordination, durability of conservation, and the NPS role in implementation. Each of these topics is addressed below.

### **1. Land Designations**

The NPS sees high potential for long-term benefit in the proposed conservation land designations. The NPS is concerned about some specific land areas immediately adjacent to NPS lands that remain undesignated for conservation or for development in the Draft EIS. Utility-scale renewable energy development in several of these undesignated areas could result in adverse impacts to NPS resources. The NPS provided comments on earlier versions of the Draft EIS to the REAT agencies identifying impacts of concern and advocating for conservation designation of certain areas such as the Silurian Valley and in the Soda Mountain region, and we have provided further specific details in the NPS comment matrix on the Draft EIS.

In regard to potential conservation and Development Focus Area (DFA) designations, the NPS recommends the REAT agencies create an Action Alternative for the Final EIS and Record of Decision (ROD) that is a hybrid of Action Alternatives presented in the Draft EIS. Our specific recommendations for land designations from multiple alternatives are in the comment matrix, and were generally informed by the mapped alternatives in Appendix L. It was often unclear in the document where to link specific recommendations (e.g., should a comment regarding benefits of proposed conservation linkages be referenced to Appendix L where habitat linkages are mapped and described; in the Chapter Two Alternatives descriptions; or in Chapter Four with the impact assessment of varying land designations?).

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<sup>1</sup> Resources and values managed and protected by NPS include, but are not limited to: biologic resources, wildlife connectivity, water quality and quantity, air quality, geologic resources and processes, paleontological resources, viewsheds, night skies, natural sounds, cultural resources and landscapes, historic properties, recreation, and the visitor experience.

As such, even if a comment is referenced to one portion of the document, NPS intends its comments to apply to all areas where applicable.

## **2. NPS Resource Impacts**

Many Plan elements would have considerable beneficial impacts to NPS resources. New protections on lands adjacent to NPS lands and throughout the landscape have the potential to benefit desert species, the historic and cultural landscape, and experiences for visitors on all types of public lands. Utility-scale renewable energy development on some lands is likely to have adverse impacts on NPS resources. NPS has commented on impacts where possible, but NPS-specific information is needed to fully understand likely beneficial and adverse impacts to NPS resources. NPS, as a separate and unique agency land manager, requests that information regarding NPS resources be specifically identified in the narratives in Chapter Four as well as in the tables.

### **Mitigation Measures for Impacts**

At this time, information regarding resource impacts and potential mitigation measures applicable to a specific geographic location or a type of resource, including NPS lands, is difficult to discern. Because of the pre-eminent protections that NPS provides, information is needed at the scale of NPS units, in addition to the ecoregion subarea scale currently used for many calculations. Also, it is not often clear which impacts are anticipated and which mitigation measures are recommended for each specific DFA or for portions within a DFA that are under different jurisdictions. Moreover, treatment and likely impacts for each species and non-biological resource is often difficult to discern, with salient information presented in several different chapters and appendices. While the chapter breakdown is a standard feature of a Draft EIS, the sheer complexity and length of this document (e.g., desert bighorn sheep appear in over 400 separate habitat calculations scattered through 200 pages of tables in Appendix M) creates an extra barrier to understanding and analyzing the treatment of a given species or resource.

Because projects may impact multiple species or their habitat types, as well as other non-biological resources – such as cultural resources, viewsheds, and watersheds – it is important that potential developers and agencies can clearly discern the likely potential impacts and required minimization measures and compensatory mitigation for a particular DFA. This is particularly important because the DRECP intends to use an integrated mitigation approach on DRECP Natural Communities Conservation Plan (NCCP) Reserve lands to carry out mitigation for multiple resources and values congruently. An integrated summary or electronic index of the minimization measures (Conservation Management Actions) for each DFA, species and non-biological resource would be tremendously helpful in understanding the protections and likely impacts for a species or resource. The NPS understands that specific calculations and planning will occur on a project-by-project basis, and encourages the REAT agencies to set up a more understandable framework now to guide later project-by-project streamlined analyses.

### **Landscape Scale Connectivity Impacts**

The NPS is responsible for managing park wildlife so as to preserve and protect these resources for the enjoyment of current and future generations, and the future of species such as desert bighorn sheep and desert tortoise is dependent upon maintaining and enhancing connections across the greater landscape. The DRECP has the potential to either enhance or restrict landscape scale connectivity. It is critical that the final land designations approved take into account the potential connectivity impacts of these land designations. It is also important that DRECP implementation measures are effective in both minimizing connectivity impacts from development and enhancing landscape scale connectivity through its compensatory mitigation program.

## **Visual Resource Impacts**

Scenic views — including, those that extend beyond park boundaries - are an important component of the visitor experience to units of the National Park system within the Plan area. The breadth of these views is inspirational and iconic of the American spirit, and they are often an important reason why people visit parks and trails. The potential development of utility-scale renewable energy in the planning area could result in a broad range of impacts to these shared scenic landscapes, including introduction of industrial facilities and their contrasting forms, lines and colors, alteration of vegetation and landform, release of fine dust, generation of glint and glare, and light pollution. The NPS is concerned that shared scenic landscapes associated with DFAs and variance lands could be lost to this and future generations if their presence and value is not accounted for and protected under the Plan. Please address DFA-specific and cumulative impacts to visual resources from multiple facilities to determine landscape effects.

### **3. Compensatory Mitigation Coordination**

The NPS recommends that the DRECP build upon the lessons learned from implementation of the BLM's Western Solar Plan, and utilize a collaborative approach to develop more detailed compensatory mitigation plans for each of the DFAs, including identification of appropriate land for off-site compensatory mitigation. Draft EIS Section II.3.1.5, Implementation, describes a chief role of the DRECP Coordination Group, as advised by the Public Agency, Stakeholder, and Independent Science Groups, as "advising plan participants how the DRECP's programmatic, Plan-wide avoidance, minimization and mitigation measures will be applied and implemented to individual Covered Activities." The document does not, however, describe this as a strategic role in coordinating mitigation actions among projects. Rather, it appears that lead federal and state agencies, counties, or proponents will be responsible for developing project-specific compensatory mitigation during a future environmental review process:

Environmental reviews of individual future renewable energy and transmission projects in the Plan Area would tier from the DRECP PEIR/EIS, as appropriate. . . Projects, activities, and decisions implemented under the DRECP would be overseen by the agencies having jurisdiction over affected lands and resource. Lead, Responsible, and Cooperating agencies having approval or oversight responsibilities for some aspect of a project would consider each applicable measure identified in the PEIR/EIS at a project level, making any necessary adjustments in the measures to account for the specific nature and location of the project and its impacts. (Volume VI, Mitigation Monitoring and Reporting Plan, at 1.)

Please describe with specificity the future process to develop these mitigation plans and ensure such plans will result in mitigation that is sufficient, proportional, and durable. The Mitigation Monitoring, Compliance and Reporting Programs (MMCRPs) described in Volume VI appear to be a critical component to the success of mitigation for any particular project, and therefore the success of the DRECP in providing protection of covered species and resources, but the document does little to describe the MMCRPs other than to say the responsibility for the MMCRPs rests with the lead agency. The Draft Implementing Agreement for the DRECP references an Integrated Project Proposal Review Process in Section 2.3, but this Section only indicates that the agencies will coordinate with one another while maintaining their respective jurisdictional authorities. The NPS encourages the lead agencies to further clarify the role of the DRECP Coordination Group or another entity in coordinating project-specific compensatory mitigation to have landscape-scale benefits, or to further develop a specific process by which the agencies, including the NPS, will cooperate on the landscape scale.

The NPS applauds the DRECP in its attempt to identify lands for both conservation and development, using the suite of scientific information gathered and analyzed for this effort. Because mitigation for individual projects is proposed at the project level by the lead agency and its cooperators, however, it is unclear whether and how these disparate mitigation actions will be unified to meet the broader goals and objectives of connectivity and resiliency envisioned under Secretarial Order 3330, “Improving Mitigation Policies and Practices of the Department of the Interior.” In the current structure and content of the DRECP, please clarify how the landscape-scale mitigation is assembled or how well it fits into either the Biological or Stepped-Down Goals and Objectives. The Draft Implementation Agreement, in Section 2.2, Assembly of the Natural Community Conservation Plan (NCCP) Reserve, explains the Reserve “will provide compensatory mitigation for the impacts of Covered Activities and to provide for the conservation and management of Covered Species,” and further defines the requirements of “Rough Proportionality,” but it does not clarify whether or how landscape-scale mitigation objectives will be evaluated and addressed through assembly of the NCCP Reserve. Impacts from utility-scale development projects, such as those to be permitted under the DRECP, will likely cause landscape-level changes to the Plan Area. These impacts should be more accurately quantified, analyzed, and compensated for if the Plan is to provide mitigation that is functional, durable, and roughly proportional. Please include citations for authority, or intentions to revise policy of the agencies to require, or apply, compensatory mitigation at that scale.

Projects that have significant landscape scale effects, such as disruption of key wildlife corridors, may have significant impact on NPS resources. Yet, the DRECP seems to indicate that decisions on what mitigation will be required to compensate for or reduce those impacts will lie solely with the lead agencies approving a project. Please work with the NPS to define a meaningful role for the NPS in determining what measures will be required to mitigate or compensate for impacts to NPS resources.

#### **4. Durability of Conservation**

##### **Durability Agreement and the DRECP NCCP Reserve**

The NPS recommends further clarity on the topic of how the draft Durability Agreement (Draft Agreement By and Between the BLM and the California Department of Fish and Wildlife (CDFW), dated September 12, 2014, supplementing the MOU By and Between the BLM and CDFW, dated November 27, 2012, herein “Durability Agreement”) will implement and conserve the DRECP NCCP Reserve lands on behalf of the DRECP. It appears that the REAT agencies will rely upon the proponent obtaining a legal instrument in order to place durable protection on compensatory mitigation lands, such as a right-of-way; permit, lease or easement; or recreation lease. (*Durability Agreement at 4.*) Exploring the use of conservation rights-of-way (or similar instruments) was a recommended course of action to the BLM by NPS and other agencies, non-governmental organizations, and stakeholders resulting from the collaborative Regional Mitigation Strategy Lessons Learned Workshop on July 17 and 18, 2014. It is not clear whether the BLM holds authority under current regulations or policies to grant a right-of-way for express conservation purposes. If the REAT agencies now intend to rely upon these instruments to carry out protection of the DRECP NCCP Reserve lands, NPS recommends clarification on regulations or policies that will be revised to allow for or clarify use of these instruments towards conservation purposes.

Specifically, NPS recommends further clarity about the length of durability afforded to the DRECP NCCP Reserve under the Durability Agreement. The REAT agencies intend for the lands to be converted to conservation purposes “for the duration of the impacts for which those lands provide compensatory mitigation. The duration of the impacts includes the duration of the project itself, decommissioning, and the restoration of the site sufficient to restore the biological functions at a level sufficient to provide habitat functions . . .” (*Durability Agreement at 4.*) Many of the activities covered by the DRECP, such as utility-scale solar development in the California desert, will result in conversion of BLM administered

lands to an industrial use for time lengths much longer than the project existence, because not all of the land or biological functions can be restored to pre-development levels. As such, NPS is concerned that ensuring protection of compensatory mitigation land for the life of the project and decommissioning process, such as through a 30 year right-of-way instrument, will be insufficient for those resources and values for which site restoration is unattainable. NPS recommends that the REAT agencies explain specifically how to ensure long-term protection of certain lands and resources, when necessary. If the intention is to utilize an adaptive management approach to allow for changes to habitat, natural communities, and connectivity of Covered Species due to climate change stressors, please describe this approach in more detail.

Moreover, the NPS is concerned about the level of durability afforded to the DRECP NCCP Reserve under the Durability Agreement. The Agreement envisions that BLM will be permitted to issue rights-of-way (or similar instruments) for non-conservation activities on BLM Conservation Lands. (*Durability Agreement at 5-6.*) NPS recognizes that some conservation goals and objectives can be met while existing concurrently with other land uses, and that the Agreement states that such subsequent projects must “minimize damage,” and that “BLM in its discretion and considering the mitigation value of the lands, will consider appropriate means of limiting impairment or inconsistency with the mitigation values,” when considering proposals on Conservation Lands. Nonetheless, the Agreement envisions a circumstance in which BLM “approves an application or action on mitigation land that impacts the values being mitigated for or makes that mitigation less effective.” (*Durability Agreement at 6.*) NPS is concerned whether the Plan can achieve durability for conservation goals and objectives if the agency administering Reserve land can issue approval of uses on these lands, which are intended to function as off-site compensatory mitigation for other developed lands. If approval of additional actions on BLM mitigation lands will create the need for additional mitigation actions not originally contemplated or provided for at the time of project review and approval, please analyze this scenario and its cumulative effects.

## **5. The NPS Implementation Role**

### **Agency Representation and Implementation**

The NPS strongly requests it be included on both the Executive Policy Group and the Coordination Group. The NPS holds in trust and manages one sixth of the land in the Plan area, and furthermore administers two National Historic Trail corridors. NPS units serve as spatial refugia and the backbone of conservation, as identified in the California Desert Protection Act of 1994, as amended. The landscape conservation goals and objectives, biological and non-biological, are generally only achievable in coordination with the NPS conservation mission that is central in the Plan Area. As such, the NPS should be represented on the Executive Policy Group and the Coordination Group in implementation. The Coordination Group is currently assigned a large number of administrative and decision-making functions throughout the document, and the NPS recommends that the functions of the group be assembled in one place so that agencies can better determine realistic staffing needs to serve the Group.

The NPS requests that the DRECP documents more thoroughly explain how the various implementation processes fit together to form a cohesive, step-by-step program that ensures the conservation goals – including impact minimization and compensatory mitigation – are met in the long term. It is implied but not expressly clear, for example, exactly what role the DRECP Coordination Group has in developing and approving the project Mitigation Monitoring and Reporting Plans. More information is also needed on how monitoring information derived from the implementation of those Plans directly informs adaptive management strategies, and how those adaptive management strategies will be carried out on the DRECP NCCP Reserve lands or at other locations. NPS recommends the agencies provide a simplified explanation and mechanism in a single location within the document, such as a flow chart, by which to better understand how these processes work congruently.

## **Consistency with the BLM Western Solar Plan**

While the NPS understands that the DRECP DFAs identify areas for wind and geothermal development, in addition to solar, there are a number of components of the BLM's Solar Energy Programmatic EIS and ROD (BLM Western Solar Plan) that should be applied to the other Covered Activities of the DRECP. In particular, the BLM Solar Energy Plan incorporates by reference BLM Instruction Memorandum No. 2011-061, Solar and Wind Energy Applications – Pre-Application and Screening (February 7, 2011), which requires prospective applicants to hold pre-application meetings with the lead agency and potentially affected federal, state, and local agencies and tribal governments. Likewise, the President's Rapid Response Team for Transmission interagency working group is working with the Department of Energy to develop a robust pre-application process to streamline electric transmission line permitting. These pre-application meetings are intended to allow for early issue identification and thereby further facilitate a streamlined application and review process. The Draft Implementation Agreement for the Draft EIS Section 2.3.5, Streamlined Review of Covered Activities, provides that an applicant may submit a Project Proposal to the DRECP Coordination Group for early, information review, but prospective applicants are not required to utilize this process.

NPS recommends that DRECP more clearly incorporate a required pre-application screening process into the Plan, which could be facilitated by the DRECP Coordination Group and described in more detail in Draft EIS Section II.3.1.5.2.3. As part of the implementation process, the NPS also recommends developing robust mitigation plans for each DFA through a collaborative, interagency and stakeholder process similar to that utilized for the Solar Energy Zones in the Western Solar Plan (see comments on Mitigation and Monitoring below).

The NPS appreciates the REAT agency attention to landscape scale interagency conservation over the past six years, and looks forward to closer collaboration throughout implementation of the DRECP.

## **Conclusion**

In summary, the NPS recognizes the DRECP's tremendous potential for landscape scale conservation. Our specific conservation designation recommendations, informed by NPS's unique longtime conservation role in the desert, are designed to help the REAT agencies achieve landscape-scale protection of biologic resources, wildlife connectivity, water quality and quantity, air quality, geologic resources and processes, paleontological resources, viewsheds, night skies, natural sounds, cultural resources and landscapes, historic properties, recreation, and the visitor experience for all land managers in the region, not just for the National Park Service. We urge the REAT agencies to work closely with the NPS wherever more information may be needed to support our conservation recommendations.

For successful interagency collaboration and to improve the clarity and implementation of the DRECP FEIS, we recommend these actions:

- Actively work with NPS to ensure that comments reach the appropriate subject matter experts and decision makers for effective consideration and incorporation into the Plan.
- Integrate the Conservation and Management Actions (CMA) into a database so that stakeholders can understand which CMA's apply to a geographic location within a Development Focus Area, and also which CMA's are proposed for a given species or resource.
- Identify NPS resource information specifically in the narratives and tables in Chapter Four so that NPS can determine likely impacts

- Incorporate DFA-specific and cumulative impacts to visual resources from multiple facilities to determine landscape effects in the impacts analysis.
- Build upon the lessons learned from implementation of the BLM's Western Solar Plan, and utilize a collaborative approach to develop more detailed compensatory mitigation plans for each of the DFA's.
- Clarify the role of the DRECP Coordination Group or another entity in coordinating project-specific compensatory mitigation to have landscape-scale benefits, or to further develop a specific process by which the agencies, including the NPS, will cooperate on the landscape scale.
- Work with the NPS to define a meaningful role for the NPS in determining what measures will be required to mitigate or compensate for impacts to NPS resources.
- Clarify the length of durability afforded to the DRECP NCCP Reserve under the Durability Agreement
- Identify regulations or policies that will be revised to allow for or clarify use of innovative conservation durability instruments such as BLM conservation Rights of Way
- If the intention is to utilize an adaptive management approach to allow for changes to habitat, natural communities, and connectivity of Covered Species due to climate change stressors, describe this approach in more detail.
- If approval of additional, nonrenewable energy projects or actions on BLM mitigation lands will create the need for additional mitigation actions not originally contemplated or provided for at the time of renewable energy project review and approval, analyze this scenario and its cumulative effects.
- In recognition of NPS's stewardship of one sixth of the DRECP Area, include NPS on the Executive Policy Group. Also include direct NPS representation on the Coordination Group as needed by NPS to address topics that will impact NPS resources.
- Explain how the various implementation processes fit together to form a cohesive, step-by-step program that ensures the conservation goals – including impact minimization and compensatory mitigation – are met in the long term. In particular, assemble the roles and responsibilities of the DRECP Coordination Group into a single description so that agencies can better determine the function and needs of the Coordination Group.
- Provide clarity on how monitoring information derived from the implementation of Monitoring and Adaptive Management Plans directly informs adaptive management strategies, and how those adaptive management strategies will be carried out on the DRECP NCCP Reserve lands or at other locations.
- Reaffirm the preapplication requirements of the BLM Western Solar Plan, and require preapplication interagency cooperation for wind and geothermal development in addition to solar development.

Additional detailed comments are attached in a comment matrix.

National Park Service Comments on the Desert Renewable Energy Conservation Plan Draft Environmental Impact Statement – February 2015

Number	Volume	Chapter	Section	Page	Paragraph	Comment
1.	III	III	10	1	2	Please add the following bullet to the list below this sentence -- "A significant paleontological resource is considered to be scientifically important for one or more of the following reasons:" Add - "The fossil extends the temporal (stratigraphic) or geographic distribution for a specific taxonomic group of fossils."
2.	III	III	10	1	2	Please modify the following bullet listed under -- "A significant paleontological resource is considered to be scientifically important for one or more of the following reasons:" to read -- "It represents an exceptionally high quality, well preserved and morphologically complete specimen". The reference "high quality" alone is too subjective and vague.
3.	III	III	10	1	2	Please modify the following bullet listed under -- "A significant paleontological resource is considered to be scientifically important for one or more of the following reasons:" to read -- "It preserves a previously unknown anatomical feature or exhibits other characteristic features which represent ontogenic, pathologic or traumatic variations".
4.	III	III	10	1&2	LAST	The final paragraph on the bottom of page 1 and top of page 2 reference the primary members of the Renewable Energy Action Team. While the NPS is not issuing permits in the same fashion as the core agencies of the Renewable Energy Action Team, the NPS owns and manages over 1/6 of the land within the Plan Area, including nationally significant paleontological resources. Please include language to reflect NPS's responsibility for protecting a significant portion of the paleontological resources in the Plan Area.
5.	III	III	10	17	LAST	Add at the beginning of the first paragraph of this section "III.10.3 Overview of Paleontological Resources Within the Plan Area" the following information. "Paleontological resource inventories have been completed for National Park Service administered lands within the DRECP plan area (Santucci et al. 2004)."  Santucci, V.L., A.L. Koch, and J. Kenworthy, 2004. Paleontological Resource Inventory and Monitoring-Mojave Desert Network. National Park Service Report TIC# D-305, 56 pp.
6.	III	III	10	22	TOP - TABLE	Several questions regarding the data in Table III.10-3 and Exhibit III.10-2. Does the table and exhibit include PFYC data for NPS acreage within the Ecoregion subareas? If so, what are the sources of NPS paleontological resource data used for determining PFYC for those Ecoregion subareas? The NPS requests that BLM or the DRECP team share any independently obtained PFYC data for NPS resources.
7.	III	III	10	22	TOP - TABLE	Note or caption under Table III.10-3 is unclear and confusing. Please provide specific examples of the rounding procedures so readers can understand.
8.	III	III	10	28	2	Please add the reference -- "Significant paleontological resources and records relating to paleobiostratigraphic events that occur within or near the park include the following (Nyborg and Santucci 1999, National Park Service 2002a)". These publications are available from the NPS upon request.  Nyborg, T.G. and V.L. Santucci, 1999. The Death Valley Paleontological Survey. National Park Service's Geologic Resources Division Technical Report, NPS/NRGRD/GRDTR-99/01, 66 p.

Number	Volume	Chapter	Section	Page	Paragraph	Comment
						Santucci, V.L., A.L. Koch, and J. Kenworthy, 2004. Paleontological Resource Inventory and Monitoring-Mojave Desert Network. National Park Service Report TIC# D-305, 56 pp.
9.	III	III	10	28	2	The References Section for Section 3.10 does not contain a full reference for National Park Service 2002a. What is the full citation for this reference cited in the narrative: National Park Service 2002a?
10.	II	II	2.3			The NPS appreciates inclusion of a water-and soil-related CMA for development on BLM lands in the vicinity of units of the National Park Service.
11.	II	II	2.3			The Hidden Hills area is proposed as a Development Focus Area or an undesignated area in the different alternatives. The NPS is unable to find analysis in the document identifying regionally or nationally significant values of the Hidden Hills area, and explaining its eligibility for ACEC or NLCS designation. Please evaluate the area for regionally or nationally significant values and discuss whether it is eligible for ACEC or NLCS designation. The NPS recommends conservation for the area based on the presence of the Salt Song Trail, Route 66, and the Old Spanish National Historic Trail, as well as its proximity to Death Valley National Park and likelihood of impacts to park visual and other resources.
12.	I	I	I.3.7			The designation of "Wildlife Allocation" should be renamed. This is not clear in the document, but if areas of Wildlife Allocation can still be used for utility-scale development and the primary difference is that the permit would not be streamlined, then this designation title is misleading or incomplete.
13.	I	I	I.3.7			The NPS suggests adding specific explanations in the document about what it would take to alter each of the BLM land designations (e.g. ACEC, NCL, wildlife allocation), if a renewable energy permit application was received to develop within that unit, or under other circumstances.
14.	I	I				<p>The National Park Service supports the President's and the State of California's goals to reduce greenhouse gas emissions by deploying green energy, in order to curb the impacts of climate change. NPS utilizes small-scale distributed renewable energy generation at many NPS facilities as part of its own commitment to enhancing sustainable practices and reducing greenhouse gas emissions, and its strategy for responding to climate change. NPS recognizes that utility-scale renewable energy development is one of the available approaches to meet the nation's energy needs. At the same time, because of its scale, such development has the potential to cause significant adverse impacts to important resources, such as cultural and natural resources and the visitor experience protected by NPS on behalf of the American public.</p> <p>The intent of the DRECP planning process is to optimize the public benefits derived from renewable energy development, while minimizing adverse impacts through careful evaluation of facilities siting and potential conservation lands. Effective landscape-scale planning includes making difficult decisions as to the highest and best use of lands, and using best available science to plan for climate change in an uncertain future. The DRECP will require policy and decision-makers to consider a variety of available tools and approaches to meet</p>

Number	Volume	Chapter	Section	Page	Paragraph	Comment
						DRECP goals. The deployment of large, utility-scale development is just one of many potential approaches for consideration. At this time, the Draft EIS considers, but eliminates from further analysis, the use of distributed generation as a tool for meeting energy demands and reducing greenhouse gas emissions. The NPS recommends the REAT agencies more fully consider whether a mix of distributed and large utility-scale generation will best achieve the landscape-scale conservation objectives and energy goals outlined in the DRECP. Moreover, the NPS recommends the REAT agencies employ the precautionary principle in zoning lands for utility-scale development in areas where other significant values are at risk.
15.	II	II.3	II.3.1.1	11.3-7	Figure 11.3-1	The Eagle Mountain Area (pocket of land on the eastern side of and surrounded on three sides by Joshua Tree National Park) should be designated as NLCS in the Preferred Alternative in the FEIS (exclusive of "impervious and urban areas"). For Alternatives 2, 3, and 4 this area (outside of "impervious and urban areas) is designated for part of the NLCS. However, the Preferred Alternative and Alternative 1 show the area as "Undesignated". ACEC lands are identified immediately to the east in all alternatives, indicating the values of these areas for habitat. An unprotected fragment of land with ACEC to the east and surrounded by National Park lands is inconsistent with the landscape scale planning and connectivity emphases of the DRECP. This area has, among other values, been identified for its important contribution as critical wildlife corridors for bighorn sheep.
16.	II	II.3	II.3.1.1	11.3-7	Figure 11.3-1	The DFA in the western portion of the Riverside East SEZ should not be larger than the SEZ that was specified in the BLM Solar PEIS. The boundaries of the SEZ were established following close collaboration with the NPS and other agencies and stakeholders because of high potential for resource conflicts in the immediate area. Until cumulative impacts as a result of expanding the DFAs in the western portion of Riverside East SEZ can be fully assessed, and appropriate mitigations incorporated, we request that the DFA in this area be re-drawn to reflect the SEZ.
17.	II	II.3	II.3.1.1	11.3-7	Figure 11.3-1	The NPS requested that height restrictions be incorporated into the western portion of the Riverside SEZ when commenting on the BLM Solar PEIS. The BLM decided not to limit development height within the specifications of the SEZ, but would instead leave height determinations to project developers. The construction of tall facilities within the western portion of Riverside SEZ or a Riverside extended DFA will likely have substantial impacts on the viewshed and night skies of Joshua Tree National Park; these include visual impacts into the heart of the park. The DFAs allow the possibility for wind development - other tall structures that were not considered as part of the Solar PEIS. These potential impacts have not been assessed in this DRECP process and the NPS requests that the DFA be redrawn as the Solar PEIS SEZ to reflect the interagency cooperation of the solar PEIS.
18.	II	II.3	II.3.2	II.3-301	Figure II.3-4	BLM LUPA - Special Recreation Management Areas (SRMA). What are the prescriptions for these areas? There could be some incompatible uses when a SRMA is overlaid with lands also designated as NLCS. Please clarify the consistency of overlapping NLCS / SRMA designations within the context of nationwide NLCS designations. Where NLCS and ACEC lands are proposed, please address for each area how SRMA uses such as motorized activities will affect the regionally or nationally significant values. The NPS recommends that motorized activities be restricted to areas where they will have few or no impacts to the regionally or nationally significant values for which NLCS or ACEC designations are created.
19.	II	II.3	II.3.2	II.3-	Figure II.3-4	Please analyze the impacts of Special Recreation Management Areas (SRMA) uses on wildlife corridors and genetic linkages for the

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				301		proposed SRMA between Joshua Tree National Park and the Mojave Preserve. Please also analyze the impacts for other SRMA's bisecting corridors between National Park Service units. The NPS recommends that SRMA uses are limited to those uses that are compatible with maintaining wildlife corridors and important genetic links for populations. The NPS has expertise in wildlife linkage between the parks and is available to consult on this analysis.
20.	II	II.3	II.3.2.1.4	11.3-311	Last, and first paragraph of next page as well	Please include existing projects or those that are permitted ahead of this DRECP process in the calculations of energy production in this DRECP document. That will more accurately reflect the total contribution of the DRECP Plan area to renewable energy production. Please clarify how energy production was calculated in this section, and reflect existing renewable energy production in the tables on energy production with a new row.
21.	II	II.3	II.3.2.3.1 2.2	II.3-417	Figure II.3-5	Visual Resources - Please include non-BLM lands that also have viewshed priorities on this map, even if a specific BLM Visual Resource Inventory has not been completed. For example, all National Park Units should be identified for public understanding and comment (perhaps as a different color). There may be other valued sites in this context as well (e.g., State Parks).  NPS has developed a new national visual inventory process to support the NPS Organic Act directive to "conserve the scenery" and will be undertaking inventories at Joshua Tree National Park, Mojave National Preserve, Death Valley National Park, and Juan Bautista de Anza National Historic Trail in the near future. In addition to the scenic quality of views from identified Key Observation Points (KOP), the inventory will identify NPS and visitor values of views. Park visitors may find the most expansive views from NPS lands to be the most iconic, and these extraordinary views can include adjacent lands. NPS requests that the results of these inventories, where available, be considered in developing project specific plans in shared viewsheds. Because Development Focus Areas are oversized to incorporate project siting flexibility, consideration of shared viewsheds should be used to site projects to avoid sensitive viewsheds. Areas of high scenic and visitor value on NPS or State Park lands should be treated as VRM Class II or I.
22.	II	II.4	II.4.1.2	II.4-5	Figure 11.4-1 (Alternative 1)	The Eagle Mountain Area (pocket of land on the eastern side of and surrounded on three sides by Joshua Tree National Park) should be designated as NLCS in the Preferred Alternative in the FEIS (exclusive of "impervious and urban areas"). For Alternatives 2, 3, and 4 this area (outside of "impervious and urban areas) is designated for part of the NLCS. However, the Preferred Alternative and Alternative 1 show the area as "Undesignated". ACEC lands are identified immediately to the east in all alternatives, indicating the values of these areas for habitat. An unprotected fragment of land with ACEC to the east and surrounded by National Park lands is inconsistent with the landscape scale planning and connectivity emphases of the DRECP. This area has, among other values, been identified for its important contribution as critical wildlife corridors for bighorn sheep.
23.	II	II.4	II.4.1.2	II.4-5	Figure 11.4-1 (Alternative 1)	The DFA in the western portion of the Riverside East SEZ should not be larger than the SEZ that was specified in the BLM Solar PEIS. This plan was developed in collaboration with the NPS and despite NPS concerns and a request to move the SEZ away from the park (i.e., east of the Palen Mountains). The NPS concerns should not be diminished, dismissed or reduced through this DRECP effort. Until cumulative impacts as a result of expanding the DFAs in the western portion of Riverside East SEZ can be fully assessed, and appropriate mitigations incorporated, we request that the DFA in this area be re-drawn to reflect the SEZ.

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24.	II	II.4	II.4.1.2	II.4-5	Figure 11.4-1 (Alternative 1)	The DFA in the western portion of the Riverside East SEZ should not be larger than the SEZ that was specified in the BLM Solar PEIS. The boundaries of the SEZ were established following close collaboration with the NPS and other agencies and stakeholders because of high potential for resource conflicts in the immediate area. Until cumulative impacts as a result of expanding the DFAs in the western portion of Riverside East SEZ can be fully assessed, and appropriate mitigations incorporated, we request that the DFA in this area be re-drawn to reflect the SEZ.
25.	II	II.4	II.4.1.2	II.4-5	Figure 11.4-1 (Alternative 1)	Planning and GIS mapping for all REAT agencies and transmission should not reflect or depend upon an option for developing a transmission line corridor through the Coxcomb Mountains within the eastern side of Joshua Tree National Park to the I-10 corridor. The NPS Lands Office has evaluated this right-of-way, and determined it is a right-of-way specific to Metropolitan Water District (MWD) issued by NPS. NPS owns the underlying land, and MWD does not have authority to lease to other groups or agencies. The NPS does not have legal authority to issue or manage “corridors” or “easements” with regards to electric transmission, and further cannot issue Rights of Way for electric transmission lines across NPS property in designated Wilderness. Although not specifically identified in this figure, visually there is a "corridor" that is carved out of the NLCS designation along this route, and the NPS is concerned this mapping could inaccurately portray a possibility for future development. Future transmission development in the corridor is not an option and should be corrected at multiple levels of the DRECP (i.e., all alternatives, transmission planning) and at state and federal (i.e., BLM levels). Since this corridor has not been identified in the Appendix K, Transmission Report, we suggest identifying this area as NLCS, as proposed for adjacent lands.
26.	II	II.4	II.4.1.2	II.4-5	Figure 11.4-1 (Alternative 1)	The area north of Joshua Tree National Park (generally Old Dale District, sometimes referred to as the "saddle") should be designated as NLCS lands in the Preferred Alternative of the FEIS as well. In all other alternatives, including the preferred, this area is included in the NLCS and ACEC designations, indicating both national and regional significance. This should be consistent, or the difference between the alternatives explained.
27.	II	II.5	II.5.1.2	II.5-5	Figure 11.5-1 (Alternative 2)	Large blocks of Future Assessment Areas are located between Joshua Tree National Park and the Marine Corps Air Ground Combat Center. These Future Assessment Areas are in direct conflict with habitat corridors that have been identified by regional efforts linking habitat between these two federal facilities. The NPS suggests removing these Future Assessment Areas as options for development.
28.	II	II.5	II.5.1.2	II.5-5	Figure 11.5-1 (Alternative 2)	Planning and GIS mapping for all REAT agencies and transmission should not reflect or depend upon an option for developing a transmission line corridor through the Coxcomb Mountains within the eastern side of Joshua Tree National Park to the I-10 corridor. The NPS Lands Office has evaluated this right-of-way, and determined it is a right-of-way specific to Metropolitan Water District (MWD) issued by NPS. NPS owns the underlying land, and MWD does not have authority to lease to other groups or agencies. The NPS does not have legal authority to issue or manage “corridors” or “easements” with regards to electric transmission, and further cannot issue Rights of Way for electric transmission lines across NPS property in designated Wilderness. Although not specifically identified in this figure, visually there is a "corridor" that is carved out of the NLCS designation along this route, and the NPS is concerned this mapping could inaccurately portray a possibility for future development. Future transmission development in the corridor is not an option and should be corrected at multiple levels of the DRECP (i.e., all alternatives, transmission planning) and at state and federal (i.e., BLM levels). Since this corridor has not been identified in the Appendix K, Transmission Report, we suggest identifying this area as NLCS, as proposed for adjacent lands.

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29.	II	II.5	II.5.1.2	II.5-5	Figure 11.5-1 (Alternative 2)	The DFA in the western portion of the Riverside East SEZ should not be larger than the SEZ that was specified in the BLM Solar PEIS. The boundaries of the SEZ were established following close collaboration with the NPS and other agencies and stakeholders because of high potential for resource conflicts in the immediate area. Until cumulative impacts as a result of expanding the DFAs in the western portion of Riverside East SEZ can be fully assessed, and appropriate mitigations incorporated, we request that the DFA in this area be re-drawn to reflect the SEZ.
30.	II	II.5	II.5.1.2	II.5-5	Figure 11.5-1 (Alternative 2)	The NPS requested that height restrictions be incorporated into the western portion of the Riverside SEZ when commenting on the BLM Solar PEIS. The BLM decided not to limit development height within the specifications of the SEZ, but would instead leave height determinations to project developers. The construction of tall facilities within the western portion of Riverside SEZ or a Riverside extended DFA will likely have substantial impacts on the viewshed and night skies of Joshua Tree National Park; these include visual impacts into the heart of the park. The DFAs allow the possibility for wind development - other tall structures that were not considered as part of the Solar PEIS. These potential impacts have not been assessed in this DRECP process and the NPS requests that the DFA be redrawn as the Solar PEIS SEZ to reflect the interagency cooperation of the solar PEIS.
31.	II	II.6	II.6.1.2	II.6-5	Figure 11.6-1 (Alternative 3)	The DFA in the western portion of the Riverside East SEZ should not be larger than the SEZ that was specified in the BLM Solar PEIS. The boundaries of the SEZ were established following close collaboration with the NPS and other agencies and stakeholders because of high potential for resource conflicts in the immediate area. Until cumulative impacts as a result of expanding the DFAs in the western portion of Riverside East SEZ can be fully assessed, and appropriate mitigations incorporated, we request that the DFA in this area be re-drawn to reflect the SEZ.
32.	II	II.7	II.7.1.2	II.7-5	Figure 11.7-1 (Alternative 4)	The block of DRECP Variance lands north of Joshua Tree National Park should be reconsidered now, especially if it bisects and is likely to impact critical wildlife corridors, and removed accordingly. The NPS recommends addition of a DRECP variance criterion that would protect this area for wildlife movement rather than leaving it open for future possible development.
33.	II	II.7	II.7.1.2	II.7-5	Figure 11.7-1 (Alternative 4)	Planning and GIS mapping for all REAT agencies and transmission should not reflect or depend upon an option for developing a transmission line corridor through the Coxcomb Mountains within the eastern side of Joshua Tree National Park to the I-10 corridor. The NPS Lands Office has evaluated this right-of-way, and determined it is a right-of-way specific to Metropolitan Water District (MWD) issued by NPS. NPS owns the underlying land, and MWD does not have authority to lease to other groups or agencies. The NPS does not have legal authority to issue or manage "corridors" or "easements" with regards to electric transmission, and further cannot issue Rights of Way for electric transmission lines across NPS property in designated Wilderness. Although not specifically identified in this figure, visually there is a "corridor" that is carved out of the NLCS designation along this route, and the NPS is concerned this mapping could inaccurately portray a possibility for future development. Future transmission development in the corridor is not an option and should be corrected at multiple levels of the DRECP (i.e., all alternatives, transmission planning) and at state and federal (i.e., BLM levels). Since this corridor has not been identified in the Appendix K, Transmission Report, we suggest identifying this area as NLCS, as proposed for adjacent lands.
34.	II	II.7	II.7.1.2	II.7-5	Figure 11.7-1 (Alternative 4)	The DFA in the western portion of the Riverside East SEZ should not be larger than the SEZ that was specified in the BLM Solar PEIS. The boundaries of the SEZ were established following close collaboration with the NPS and other agencies and stakeholders because of high

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					4)	potential for resource conflicts in the immediate area. Until cumulative impacts as a result of expanding the DFAs in the western portion of Riverside East SEZ can be fully assessed, and appropriate mitigations incorporated, we request that the DFA in this area be re-drawn to reflect the SEZ.
35.	IV	IV	4.08			The NPS recommends development and publication of a clear timeline relating the NEPA and the NHPA Section 106 processes.
36.	III	III.7	7	162		This comment relates to the first sentence on this page regarding the removal of cottonwoods. Elf owls were recorded breeding at Cottonwood Springs within Joshua Tree National Park in April of 2013. Is there a citation for the removal of Cottonwoods? A report from Steven Cardiff from the San Bernardino County Museum in 1978, stated that Cottonwood were removed from the Oasis in about 1966. However, according to park records (December 1965 and January 1966), only hazard branches were trimmed off of the Cottonwoods.
37.	III	III.8	III.8.3	8-39	Last	References cultural resource surveys for CDCA and states that 179,000 acres were systematically surveyed. There does not seem to be supporting data for this assertion, nor for data included in Appendix R1.08. This supporting data should be incorporated by reference and made available for review. This is a tremendous amount of acreage for pedestrian surveys. The text does not indicate if these acres were in fact all covered in formal surveys that meet professional standards. Do these surveys hold up to current professional standards? (This also relates to comment in Appendix R and Section IV for cultural resources)
38.	IV	IV.7	7-53	281		As bats are encountering an unprecedented loss in numbers due to the continuing westward spread of white-nose fungus and related mortality, the NPS does not understand the context for considering almost 300,000 bat collisions/year a reasonable number. This may be a good place for a better metric with a different strategy to reduce bat mortality. This metric should reflect the latest scientific predictions of white-nose syndrome effects on bat populations, and the DRECP should contain a requirement to re-evaluate bat conservation strategies yearly in the context of white-nose mortalities.
39.	IV	IV.8	8.1.1	8-2	Last ¶	It is not clear if the calculations of cultural resource densities is valid or meets current scientific standards. Recent research by Warren and Scheinder has shown that resource densities vary significantly by vegetation zone and the “Plan Areas” as defined herein crosscut numerous vegetation zones. The Owens Valley is one of the few Plan Areas where the survey may be an accurate reflection of resource density, although even this probably under represents the true resource density, both in terms of actual archeological/historic resources identified and since TCPs and Landscapes are not included in the calculations. Cultural resource density models based on vegetation zones (for prehistoric resources) and geologic data (historic mining) would provide a far more accurate reflection of resource density. Our interpretation of the text is that the authors took the total number of documented resources throughout the entire DRECP plan area to calculate the predicted resource density for any given ecoregion subarea (e.g. the Owens Valley). It would provide higher accuracy to instead take the total number of resources documented just within the ecoregion subarea divided by the number of acres surveyed within just the ecoregion subarea, and extrapolating out resource densities. Basing calculations on total number of documented resources throughout the entire DRECP Plan Area may significantly underestimate resources in some ecoregion subareas and overestimate in others. Please indicate where cross checks were done to ensure that this approach accurately reflected resource densities in ecoregion subareas (This also relates to comment in Appendix R and Section III for cultural resources).
40.	IV	IV.8	8.2.1.2	8-7	Last	“Structure Installation” – does not include PV or mirror fields; is “troughs” supposed to encompass these as well? Please list all relevant

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						examples including ponds/water storage.
41.	IV	IV.8	8.3.2.1.1	8-35	FAAs	“...renewable development in an FAA would not require a BLM Land Use Plan Amendment” – Please address how Sec. 106 will be handled for these areas. Please also address what protection/consideration historic properties will receive. The same request applies for the DRECP Variance Lands.
42.	IV	IV.8	8.3.2.1.1	8-35	SAAs	The high cultural value of the SAA lands warrants their designation as Conservation lands, and not subject to future development. While TCP data cannot be shared in a public document per Section 304 of the NHPA, tribal consultation is absolutely necessary to document traditional cultural values of these lands and inclusion in the Conservation system.
43.	IV	IV.8				Throughout this chapter TCPs and Landscapes are not included in the calculation of cultural resources. How will Section 106 obligations be met for DFAs, FAAs, SAAs, and Variance Lands? Due to the highly unique nature of these types of resources, predictive models cannot be used as they can be with archeological and historic resources to estimate densities. Separate 106 consultation with Native American tribes is recommended for all renewable energy development regardless of land designation (DFA, FAA, Variance, etc.) to identify TCPs and landscapes. Vol III, Chapter 8 (III.8.3), page 8-37 states “The TCPs will be identified through BLM’s ongoing consultation with Native American tribes and/or any other interested parties.” This text should be restated or referenced in each appropriate paragraph throughout IV.8 to reinforce that the BLM is going to meet its Section 106 mandates (36 CFR 800).
44.	IV	IV.8	8.3.2.1.1	8-37		CMA’s / National Trails – (this comment applies to all of the CMA’s for National Trails in each alternative): it is unclear in each alternative whether the “Corridor Width” lists the total width or if the number listed is on either side of a centerline; recommend rephrasing as “Establish a National Trail Management Corridor generally __ miles wide following the centerline of the trail.”
45.	IV	IV.8	8.3.2.1.1	8-37	Width	The NPS recommends that the Preferred Alternative offer the greatest degree of protection for National Trail corridors by increasing the total corridor width to 10 miles on each side of the centerline.
46.	IV	IV.8	8.3.2.1.1	8-37	ROW	“...except in designated transmission corridors.” Maps are recommended to show where these transmission corridors are currently located, where they are reasonably anticipated in the future, and how they interface with the proposed trails.
47.						“Approved transmission corridors.” Does this apply only to current transmission or future transmission as well? Allowing future transmission corridors to impact National Historic Trails, high potential historic sites, cultural landscapes, etc. should be avoided. A possible minimization measure to consider: transmission corridors should run perpendicular to trails and not parallel, to limit the impact. Although there would be a visual impact regardless, transmission corridors crossing trails would have less of a cumulative impact than corridors paralleling trails. The NPS recommends adding a transmission CMA that would guide transmission siting perpendicular to trails.
48.	IV	IV.8		8-37	National Trails	The Preferred Alternative states that the DRECP will make decisions for three National Trails (Pacific Crest NST, Old Spanish NHT, and Juan Bautista de Anza NHT). Language in Alternative 3 appears to only apply to the Pacific Crest NST, for all of the other alternatives it is unclear if the CMA’s apply to all three trails, the language is exceedingly vague. “Management Corridor Width” sections for each alternative should probably read “from the centerline of each trail” if all three trails are in fact being covered by the CMA for National Trails.
49.	II	2				Preferred Alternative: NPS would strongly support establishing CMA’s that apply to all 3 National Trails, providing the widest possible

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						corridor (10 miles from centerline); excluding Site Authorization from all corridors; excluding Linear Rights of Way to the greatest degree possible (exclude new transmission corridors, or mandate that new corridors do not run parallel to trails.).
50.	IV	IV.8		8-38	National Trails	Renewable Energy Rights-of-Way: same comments as above; Does “approved transmission corridors” refer to currently approved or future? The NPS recommends no future transmission corridors receive approval in National Trail corridors.
51.	IV	IV.8		8-38	National Trails	Also states “except in approved DFAs” – Does this mean that National Trails and DFAs interface? The NPS is unable to locate maps within the DEIS or on Data Basin that display the trail corridors. While the NPS has access to such maps, the general public may not have been able to analyze and comment on the location of trail corridors in relation to proposed DFA’s and other development, so this information should somehow be made available to the public. No DFAs should be established that interface with National Trails (or minimized to the greatest degree possible).
52.	IV	IV.8		8-38	National Trails	The lack of maps showing the National Trails in relation to various DFA proposals, Linear Rights-of-Way, and Renewable Energy Rights-of-Way is a problem that should be addressed. It is very difficult to assess the effects of the proposed alternatives without maps showing the trails, current authorized transmission corridors, and DFAs that would allow reasonable predictions of future transmission corridors. It is not clearly stated in the text whether future transmission corridors will be authorized in the National Trail Corridors or excluded.
53.	IV	IV.8		8-38	National Trails / Minerals	In lieu of commenting on each alternative: in regards to Minerals, in the Preferred Alternative the NPS would recommend the “Locatable Minerals” be fully withdrawn, “Saleable Minerals” be made unavailable and “Leasable Minerals” be made unavailable in the newly designated National Trail Corridors.
54.	IV	IV.8		8-37	CMA’s	The NPS appreciates the DRECP agency efforts for developing CMA’s that apply to the entire planning area. However, because the document states that “the details of the CMA’s would be modified to meet the requirements of state law, the CEC, or other appropriate state lead agencies”, the NPS is unable to determine what protections the CMA’s might grant to National Historic Trails, or to other cultural resources. It is also often unclear in the document which CMA’s apply to all of the alternatives, or just the Preferred Alternative. Where the document states that the CMA’s “vary significantly by alternative”, please direct the reader to a location in the document where the reader can determine which CMA’s apply to each alternative.
55.	IV	IV.8		8-41	1st	Is the top line here a header? Should it be in a different type face?
56.	IV	IV.8		8-41	2nd to last bullet	This bullet should be updated, or another bullet added, that states that the DRECP Coordination Group or a designated entity will actively update the geodatabase as new data are generated from development projects. This practice will continue to improve the efficacy of the geodatabase to improve accuracy of preplanning and site location.
57.	IV	IV.8		8-42	Cultural and Tribal CMA’s... 1st bullet	Recommend stipulating that a portion of DFA mitigation funds are directed to survey, identification, and recording of new cultural resources within ACEC boundaries.
58.	IV	IV.8		8-43	CR-1a	Recommend adding language that the “Treatment plan” is approved by SHPO, THPOs, and the ACHP. Ex: Develop a treatment plan in consultation with the CA SHPO and THPOs that is approved by all parties and the ACHP for the unanticipated discovery...
59.	IV	IV.8		8-44	CR-2a	Should involve SHPO, THPO, and ACHP involvement and concurrence (NHPA Section 106 or 36 CFR 800 authority).

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60.	IV	IV.8		8-45	CR-3a	Should cite NAGPRA specifically, not just “e.g.”
61.	IV	IV.25	25-5	Table IV.25-5	Overall comment	This section outlines the amount of habitat found within the DFAs for a number of species as well as the amount of habitat found within the reserve design. This analysis is important to the overall understanding of the effort and is supported by the NPS. It is important to point out that this is an a priori approach and considers species that are important to conservation at this point in time. Mechanisms for incorporation of species that become candidates for management concern for the life of this plan should be specified.
62.	Appendix K					Please clarify whether new or upgraded transmission lines are proposed within or adjacent to areas that are now designated as Desert Tortoise DWMA.
63.	Appendix R	R1.08				The number of “Acres Surveyed” in Table 8-2 is multiple orders of magnitude greater than the acres listed in the primary sources listed in Table 8-1. Where do all of these other “Acres Surveyed” come from? If these have not been systematically surveyed, then on what basis are they included in the resource density calculations? (This also relates to comment in Sections III and IV for cultural resources). The DEIS text should address these questions.
64.	Appendix L Big Morongo Canyon					The NPS supports adding the lands into the NLCS for the protection of the important wildlife habitats found there. These lands are adjacent to Joshua Tree National Park and with higher biological protection, will protect important movement corridors for bighorn sheep, mule deer and many other wildlife species. The NPS also supports the recommendation regarding the withdrawal of mineral entry from the site.
65.	Appendix L Cadiz valley					The NPS supports the designations offered by Alternative 2, which would provide the most comprehensive protections of wildlife, plants and cultural values. This alternative would serve to connect Joshua Tree National Park to Mojave National Preserve. This connection would create contiguous protected habitats between these areas utilized by bighorn sheep and desert tortoise among countless other wildlife species. Please incorporate the full level of protection currently drawn in Alternative 2 into the Preferred Alternative.
66.	Appendix L Chuckwalla-Chemehuevi					The NPS supports the designations in the Preferred Alternative, which would essentially create a contiguous swath of protected land from Joshua Tree National Park to the Colorado River. This plan would protect countless wildlife species and be especially important for desert tortoise and mule deer.
67.	Appendix L Chuckwalla					This description is a little unclear compared to the others in way of the alternatives. Alternative 2 does provide heightened protections, but also seems to provide more DFAs than Alternative 1. Alternative 3 shows the highest level of porosity of the DFAs that may be important to species living on either side of the DFA areas. Please clarify the description and mapping of this alternative.
68.	Appendix L Mojave fringed-toed lizard					This section describes a number of different units, but only one unit is noted on the maps. Please clarify and reconcile the mapping and written descriptions. The NPS recommends the maximum area designated for protection. Sand transport habitats are very important to the Mojave fringed toed lizard as well as a number of other documented and undocumented animals including insects. These habitats are sparse throughout the Mojave and the NPS.
69.	Appendix L Palen Ford					The NPS agrees that the protection of dune habitats described will link these habitats across the area and preserve connections among park refugia. Alternative 3 provides the best protection of these important habitats and would allow for the most continuity of the ecosystem. Please incorporate the full level of protection currently drawn in Alternative 3 into the Preferred Alternative.

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70.	Appendix L Pinto Mountains					The NPS strongly supports the increased protections that the Preferred Alternative shows. In addition, there are strong mineral interests in this area that need to be addressed. In many of the proposed conservation designations, limitations to mineral interests are proposed. In this area, the NPS recommends the withdrawal of new mineral interests as well as the retirement of expired claims.
71.	Appendix L Sand to Snow SRMA					The NPS strongly supports the creation of the Sand to Snow SRMA as described in the Preferred Alternative.
72.	Appendix L Alligator rock					The NPS supports the proposed designations in the Preferred Alternative and Alternative 2 as these lands are near the park and are important for the special status species such as the golden eagle and the desert tortoise. Protection of these lands will augment the health of neighboring wildlife populations which in turn, augments the health of wildlife populations found in Joshua Tree National Park.
73.	Appendix L Corn Springs					This area is very important for many cultural and natural resources. The heightened protection of the area as described would benefit many species of plants and animals as well as the many cultural resources that are found in the area.
74.	Appendix L Mule- McCoy linkage					The different alternatives for this proposed linkage are difficult to interpret from the maps and description. The Preferred Alternative and Alternative 2 do not appear to show linkage between these two areas. Only Alternatives 1 and 3 appear to show linkages between these two areas. The linkage included in alternatives 1 and 3 should be included in the Preferred Alternative.
75.	Appendix L Old Woman Springs					The NPS supports the proposed designation in the Preferred Alternative here. For many ACEC and NLCS designations, withdrawal of mineral entry is proposed. The NPS supports withdrawal of mineral entry to minimize disturbance in this area as well.
76.	Appendix L Patton Camps					The story of these camps is interpreted to Joshua Tree National Park visitors, and is an important part of the cultural landscape. The park also has examples of these camps within our borders. The NPS supports protection of these lands as an important step in augmenting the story of Patton and desert military training.
77.	Appendix L Pipes Canyon					The NPS supports the proposed designation in the Preferred Alternative, which provides the protection of a wildlife corridor between protected lands found in Joshua Tree National Park to areas protected by the Wildlands Conservancy.
78.	Appendix L Santos Manuel					The NPS supports the proposed designation in the Preferred Alternative, which protects some large areas of low to no disturbance. Protecting these areas will help create a large block of protected lands between BLM wilderness areas, the Pinto Mountain ACEC and Joshua Tree National Park.
79.	Appendix L Upper McCoy					The NPS supports the proposed designation in the Preferred Alternative, which would protect bighorn sheep movement corridors important to Joshua Tree National Park.
80.	Appendix L Whitewater Canyon					The NPS supports the proposed designation in the Preferred Alternative, which would provide a continuity of protected lands that would extend from the Whitewater preserve to Joshua Tree National Park via Big Morongo Canyon Preserve.
81.	Appendix L Symmes Creek ACEC					The NPS is concerned about potential designation of this area as an Area of Critical Environmental Concern with restricted activities and a 1% disturbance cap. The local BLM field office and the NPS have been working on restoration plans to prevent erosion and flooding in this area, and the designation and disturbance cap could preclude the erosion and flooding control work. The area already has protection as a Wilderness Study Area, and the NPS sees WSA status as sufficient protection for BLM and NPS resources in this area. If the area is

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						designated as an ACEC, the NPS recommends that specific provisions be included in the designation to allow for actions that address erosion and flooding.
82.	Appendix L, Manzanar ACEC					The NPS appreciates the consideration for Manzanar NHS visual resources and historic significance.
83.	Appendix L Panamint Valley					Panamint Valley and Searles Valley are large sand transport corridors that contribute to the ecosystem health of the Panamint Dunes in Northern Panamint Valley. The Panamint Dunes are home to two Death Valley NP endemic plant species, shining milkvetch ( <i>Astragalus lentiginosus</i> var. <i>micans</i> ) and Death Valley sandpaper plant ( <i>Petalonyx thurberi</i> ssp. <i>gilmanii</i> ). Once a candidate for Endangered Species Act listing, the shining milkvetch only occurs at the Panamint Dunes and Eureka Dunes. This suitable habitat for this psammophytic species is less than 6000 acres and the Panamint Dunes comprise about 1500 of these acres (25%). An occurrence of the rare gravel milkvetch ( <i>Astragalus sabulorum</i> ) is also located at these dunes and relies on Panamint Valley aeolian system in order to survive. Therefore, the NPS supports the Preferred Alternative as the best choice for preserving the nationally significant values for this region. Alternatives 1-4 propose a DFA in Northern Searles Valley which may adversely affect the aeolian processes contributing to the ecosystem health of the Panamint Dunes and the habitat for these narrowly endemic plant species. The NPS does not recommend placement of a DFA in the Northern Searles Valley, and recommends analyzing how the proposed DFA in the northern Searles Valley may affect aeolian transport and the survival of these two endemic plant species.
84.	IV	4				Panamint Valley and Searles Valley are large sand transport corridors that contribute to the ecosystem health of the Panamint Dunes in Northern Panamint Valley. The Panamint Dunes are home to two Death Valley NP endemic plant species, shining milkvetch ( <i>Astragalus lentiginosus</i> var. <i>micans</i> ) and Death Valley sandpaper plant ( <i>Petalonyx thurberi</i> ssp. <i>gilmanii</i> ). Once a candidate for Endangered Species Act listing, the shining milkvetch only occurs at the Panamint Dunes and Eureka Dunes. This suitable habitat for this psammophytic species is less than 6000 acres and the Panamint Dunes comprise about 1500 of these acres (25%). An occurrence of the rare gravel milkvetch ( <i>Astragalus sabulorum</i> ) is also located at these dunes and may rely on the Panamint Valley aeolian system in order to survive. Therefore, the NPS supports the Preferred Alternative as the best choice for preserving the nationally significant values for this region. Alternatives 1-4 propose a DFA in Northern Searles Valley which may adversely affect the aeolian processes that contributing to the ecosystem health of the Panamint Dunes and the habitat for these narrowly endemic plant species. Please analyze how the proposed DFA in the northern Searles Valley may affect aeolian transport and the survival of these two endemic plant species.
85.		Executive Summary (E.S)		48-51		Table 9 (on pages 48 & 49) presents a summary of the significant impacts for the No Action Alternative compared with the five Plan Alternatives (or “action alternatives”). In this table, summaries for 10 of the 23 environmental disciplines that were analyzed are presented. On pages 50 and 51, expanded discussions are presented for 9 of these 10 environmental disciplines that describe the significant impacts that would result from implementation of one or more of the alternatives evaluated in this EIR/EIS. The only discipline that appears to be missing from the discussion is that for Groundwater, Water Supply and Water Quality. If this is an oversight, please correct by including an appropriate discussion. If this is not an oversight, the NPS suggests providing a brief clarification in this portion of the Executive Summary of why there is no discussion for this discipline.

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86.		E.S.		53		One of the shared bullets presented under the discussions about key differences between the Preferred Alternative and Alternative 1 needs additional clarification. The shared bullet in question relates to both of these alternatives allowing development within the smallest number of groundwater basins that are in overdraft or stressed condition. It is unclear whether or not the statement is referring to current or projected groundwater conditions within the effected basins. If this refers to current conditions, the statement begs the follow-on question about the number of un-developed basins that will be put into an overdraft or stressed condition, which should also be addressed in the lists of key differences among the various alternatives.
87.	II		II.3	402	1st	Discussion in this paragraph relates to the various laws and regulations that govern the use of surface water and groundwater resources in California. It is suggested that this discussion (and similar discussions in III.6.1) be revised to also recognize the recent passage of legislation (AB 1471) and water bond in the fall of 2014 that establishes the regulation of groundwater development in all of California’s groundwater basins. Where possible, the discussion should evaluate how this new legislation might affect the implementation of the Preferred Alternative. Since specific regulations and policy have not been drafted yet, this programmatic EIS/EIR should recognize the potential need and flexibility for adapting to the forthcoming regulations and policies.
88.	II		II.3	408	1st	Reference is made in this paragraph to using “best available data” in determining a water budget for a groundwater basin where a project(s) is proposed for development. The NPS requests that the term “best available data,” be defined here and throughout the document to include the collection of site- and basin-specific hydrologic data needed for that basin if such data are non-existent or substantially lacking to make a scientifically defensible determination. Many of the groundwater basins where renewable energy development has occurred and is projected lack sufficient site-specific data to make such determinations and allowing extrapolation of “best available data” from other basins may not always be desirable or scientifically justified. The small comparative cost of collecting this data versus the much larger overall cost of developing these projects is justified to improve the defensibility of the hydrologic analysis and potential mitigation measures that might be needed to offset the effects of the associated groundwater development. If these data are not available, the REAT agencies may want to reference 40 CFR 1502.22.
89.	III	6	6.2	Table III.6-1		The 4th column of Table III.6-1 summarizes information about the estimated groundwater use in each basin represented in the DRECP. The reported values are given in acre-feet/acre, which is more an application rate, and the footnote for this column gives no indication why this unit of measure was used. When presented in this manner, the resulting low values give the reader a false impression that water use is very low in most of these basins, when in many cases it may not be. The NPS recommends that you revise these totals to the more commonly used unit of measure of acre-feet/year to give the reader a better sense of the total annual volume of groundwater used in these basins. This comment applies to other tables and figures in this chapter that use this unit of measure.
90.	III	6	6.3.1	6-30	2nd	The NPS recommends moving the last sentence in the 2nd paragraph and make it the last sentence of the 1st paragraph on this page. This sentence seems more appropriate to the discussion in the 1st paragraph.
91.	III	6	6.3.2	6-35	1st	Discussion in the first paragraph on this page refers to several major faults within the DRECP area that appear to be shown on Figure III.6-5. The NPS recommends labeling these major faults on this figure so the reader has a better understanding of where they are located.

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92.	III	6	6.3.3.2	6-41 & 6-42		In the 2nd paragraph on page 6-41, it is noted that the USGS model used to estimate precipitation recharge in the various ecoregion subareas was not calibrated to recharge or runoff measurements. Just as important, if not more important, the discussion should indicate whether or not these recharge estimates were calibrated against total discharge estimates in these subareas. Later discussions on discharge of groundwater in sections III.6.3.3.3 through III.6.3.3.5 appear to provide estimates of discharge for only one of the discharge components (i.e., groundwater use) within these subareas, suggesting the total recharge estimates have not been calibrated (i.e., constrained) against total discharge estimates to see if they are realistic or not. As a result, the discussion on pages 6-41 and 6-42 should be revised to indicate that the modeled recharge estimates also have not been calibrated against total discharge estimates and that the recharge estimates should be viewed as preliminary in nature. While it is fine to recognize and discuss other potential sources of recharge not accounted for in these estimates, the text should be revised to avoid using unduly speculative descriptions like “substantial amounts of surface runoff and subsurface inflow” or “rainfall recharge estimates underestimate total available recharge in some basins” until additional hydrologic evaluations are conducted to quantify the various recharge and discharge components in a basin(s). At a minimum, the uncertainties regarding these statements should be disclosed.
93.	III	6	6.3.5.1	6-63 to 6-67		Much of the discussion in this section describes other hydrologic aspects of the area already discussed in earlier sections of this chapter when it should be describing aspects of groundwater salinity. Based on similar discussions presented for other ecoregion subareas in sections III.6.3.6 through III.6.3.14, it suggests section III.6.3.5 should be renamed to Cadiz and Chocolate Mountains Ecoregion Subarea. With respect to Figure III.6-14, why aren’t the Cadiz and Bristol Valleys shown as having a higher average salinity? There is corroborating data available to indicate groundwater in the central portion of the valley is extremely saline (values as high as 298,000 mg/L have been reported in the vicinity of Cadiz and Bristol Dry Lake playas), but the figure suggests this data is not taken into consideration. If this is an example where a few very high salinity values were disregarded as outliers, then the discussions in this and other sections (and Figure III.6-14) should at least note which valleys were treated as such to better inform the reader on valleys that might have areas of very high salinity. Such high salinity areas may preclude renewable energy projects from using normal water treatment technologies to provide fresh enough water to meet project needs. Additionally, similar discussions on groundwater salinity in subsequent sections on the other ecoregion subareas indicate a consistently reported high value of 150,000 mg/L, which should be checked for accuracy.
94.	III	6	6.3.5.1	6-64	3rd	In the discussion about annual recharge for the Cadiz and Chocolate Mountain ecoregion subarea, an estimate of the total average recharge for this area is given. It is cautioned in the text that this estimate “ <i>is a minimum estimate for recharge because it excludes potential irrigation return flows and rainfall in watershed areas outside the overall general Plan Area. The runoff from these outside watershed areas may generate substantial amounts of additional recharge as either percolating runoff or subsurface inflow.</i> ” Similar statements are made in the discussions in Sections III.6.3.6 through III.6.3.14. The NPS recommends that the words “ <i>minimum estimate</i> ” be replaced with preliminary estimate and the words “ <i>substantial amounts of</i> ” be removed as there is no supporting evidence presented indicating these components of recharge could be substantial or small. The discussion should avoid using unduly speculative descriptions like those noted until additional hydrologic evaluations are conducted to quantify the various recharge and discharge components. Revisions should also be made to similar statements that might be made in the discussions in Sections 6.3.6 through 6.3.14.

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95.	IV	6	6.1.1	6-2 & 6-3		<p>The discussion at the bottom and top of these respective pages about what constitutes overdraft vs. stressed aquifer conditions needs additional clarification. Much confusion is caused by defining these conditions at a basin-level, but conducting the programmatic evaluation under the DRECP at an ecoregion-level (i.e., multiple basins). Currently, two possible thresholds are established for defining stressed conditions (i.e., declining water levels or a rather arbitrary groundwater use &gt; 0.03 acre-feet/acre), while the threshold for defining overdraft conditions is qualitatively tied to a sustainable or perennial yield approach (i.e., annual use &gt; annual recharge = overdraft conditions). In the case of stressed conditions, one of the thresholds (declining water levels) would also apply to overdraft conditions, so this measure alone doesn't help to differentiate between the two conditions. Additionally, how did you decide on the 0.03 ac-ft/ac threshold estimate? Later in Section IV. 6.3.2.1.1, Figure IV.6-2 is introduced showing which basins are designated as having stressed and overdraft conditions. Moving this figure to Section IV.6.1.1 would greatly aid the discussion on stressed vs. overdraft conditions, but additional discussion would still be needed to describe how basins in this figure were determined to be under stressed or overdraft conditions. When the basins in Figure IV.6-2 are compared to the same basins in Figure III.6-13, which shows estimated groundwater use in each basin, many of the basins with a water use &lt; 0.03 ac-ft/ac (i.e., less than the established threshold for a stressed basin) are designated as having either stressed or overdraft conditions. The information presented in these two figures should be consistent with each other basin to basin.</p> <p>As previously noted in Chapter III.6, under pre-development conditions, the amount of recharge to and discharge from each individual basin is presumed to be roughly equal to each other, so technically, once groundwater extraction begins in a basin, this equilibrium is disturbed and the basin enters a "stressed" state. Since recharge estimates only have been provided and discussed at an ecoregion-level (not a basin-level) and groundwater use estimates only have been provided and discussed at a basin-level, the NPS recommends re-estimating and discussing recharge estimates at the basin-level in order to clarify the programmatic threshold between stressed and overdraft conditions. This would allow use of the perennial or sustainable yield approach to better differentiate between stressed vs. overdraft conditions, as measured by estimated total groundwater consumption in a basin exceeding the estimated total recharge for the same basin. Therefore, stressed conditions would be clarified as some range of consumptive groundwater use up to but not exceeding the perennial yield (i.e. total annual recharge) of the basin, and overdraft conditions would be defined as total groundwater use exceeding the perennial yield of the basin.</p> <p>The revised individual basins within selected ecoregions that are identified in the DRECP as having stressed or overdraft conditions (currently identified in Table III.6-1 and Figure IV.6-2) should be called out accordingly in the discussions presented in Chapter IV.6, especially if concentrated renewable energy development is targeted for these basins. If possible, the discussion should also call out other basins where impacts from nearby concentrated renewable energy development might cause these basins to experience overdraft conditions, even if they are not currently recognized as being overdrafted.</p>
96.	IV	6	6.2.1.2	6-8	2nd	<p>Recommend that the last sentence in this paragraph be revised to indicate that the observation in the preceding sentence is more typical of photovoltaic and dry-cooled solar thermal technologies instead of solar projects in general. Wet-cooled solar thermal technology typically has a higher water demand during the operational phase than during the construction phase. The NPS also recommends that the</p>

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						recent changes in water use of the Desert Sunlight photovoltaic project be incorporated as new data for estimating water use of projects in the region.
97.	IV	6	6.3.1.1.1	6-13		In the discussion on Impact GW-2, the NPS recommends the discussion be revised to include a comparative evaluation of the estimated total water demand vs. the total estimated recharge in the ecoregion subareas if the current approach is retained, and indicate whether the total water demand may cause overdraft conditions in these subareas, the likely basins in which overdraft conditions might occur based on where the development is most concentrated, and the likely cause (e.g., choice renewable energy technology?). For example, the results in Table VI.6-1, the range in water use for the Imperial Borrego Valley subarea (12,000 – 27,000 afy) indicates the total demand for water would exceed the estimated total annual recharge (720 – 760 afy) for the basins comprising this subarea, as previously noted in Figure III.6-7, by more than an order of magnitude, suggesting that serious groundwater overdraft conditions would result in some of the basins (identify most likely basins) within this subarea, primarily due to the (wet-cooled?) geothermal technologies that would be employed, as already noted in the text. Applying this evaluation to other subareas listed in Table IV.6-1 indicates that the upper range of water use in the Cadiz Valley and Chocolate Mountain subarea (16,000 afy) also exceeds the estimated total annual recharge for this subarea (4,200 – 4,500 afy) which could create overdraft conditions in some of the basins (identify most likely basins) within this subarea, primarily due to the choice of (wet-cooled?) solar thermal technology. Many of the impacts noted by the bullets in the existing discussion (as well as the discussion under Impacts GW-3 and GW-4) could result from overdraft conditions or highly stressed conditions. This additional evaluation and discussion should be applied to all appropriate impact discussions under the No Action Alternative, as well as all of the other alternatives (Preferred and Alternatives 1-4) discussed in later sections of this chapter to better inform the reader on the potential impacts related to siting and choosing different renewable energy forms (solar, wind, geothermal) and technologies (wet- vs. dry-cooled, photovoltaic, etc.).
98.	IV	6	6.3.1.1.1	6-14		In the discussion under Impact GW-4, we recommend revising the last sentence to include the text “ <i>the magnitude and proximity of development relative to highly saline groundwater areas</i> ” as an additional indicator of this type of impact. This recommendation applies to all similar impact discussions under the No Action Alternative, as well as all of the other alternatives (Preferred and Alternatives 1-4) discussed in later sections of this chapter.
99.	IV	6	6.3.2.1.1	6-24 & 6-25		Table IV.6-2 does not include a range of water use estimates like Table IV.6-1, which summarized the range of water use based on different renewable energy types and technologies that were evaluated. Additionally, there is little indication in the discussion on these two pages to indicate different renewable energy types and technologies were evaluated. Please clarify why only one water use estimate is reported for each ecoregion subarea and what mix of renewable energy types and technologies were evaluated to better inform the reader. This comment applies to similar tables and associated discussions in subsequent sections discussing the remaining alternatives.
100.	IV	6	6.3.2.1.1	6-26		The discussions presented for Impacts GW-3 and GW-4 seem very short with respect discussing these particular impacts (subsidence and migration of poor-quality water). The NPS suggests including additional text discussion similar to the last sentence under Impact GW-2 to improve this discussion. If possible, indicate in the discussion which overdraft and/or stressed basins may be most susceptible to the effects under Impact GW-2, GW-3 and GW-4 under the Preferred Alternative, as well as similar discussions presented for all other

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						alternatives evaluated.
101.	IV	6	6.3.2.1.1	6-27 & 6-29	Fig. IV.6-1 & Fig. IV.6-2	Figure IV.6-1 is very informative with respect to conveying the locations and magnitudes of water usage associated with the proposed renewable energy developments relative to the location of basins estimated to be in overdraft conditions. The NPS recommends improving this figure by also indicating which basins are estimated to be under stressed conditions. This suggestion applies to any similar figure used in subsequent sections discussing the other alternatives. Additionally, we would recommend generating a similar figure, if possible, for use in the discussion about the No Action Alternative. Figure IV.6-2 is also informative, but seems out of place and incomplete, as it only shows which basins are under overdraft and stressed conditions, even though the figure title and legend indicate water usage information is supposed to be illustrated but is not in fact illustrated. We recommend moving this figure (with any inferences to water usage removed) to Section VI.6.1.1, where discussion about overdraft and stressed conditions are first introduced in this chapter. This would greatly improve the reader’s understanding of this discussion if they can see where the different overdraft and stressed basins are located in the DRECP area. We also suggest removing all similar figures presented in subsequent sections discussing the remaining alternatives.
102.	IV	6	6.3.2.1.1	6-31		The claims in the second paragraph under the discussion about Future Assessment Areas that such development would likely not affect groundwater resources cannot be substantiated, as there is no indication of how many acres of development might be involved in the stressed and overdraft basins. We recommend that you revise the discussions about FAAs, SAAs and DRECP Variance Lands accordingly, here and throughout the rest of this chapter, to indicate the number of acres of potential development associated with these three study area land types. If the acreage is large, then such claims of “no affects” may be erroneous, especially if the acreage of proposed DFAs in these basins is large to begin with.
103.	IV	6	6.3.2.1.1	6-32 & 6-33		The first bulleted CMA discussion seems to be contradictory to the proposed siting of many renewable energy projects in basins identified as having overdraft conditions, which have been defined in the DRECP as any basin where the total annual discharge exceeds the perennial or sustainable yield of a basin. As a result, if these projects are allowed to pump groundwater in these basins, then they would exacerbate the existing overdraft conditions within these basins, thus never achieving the objective established in the first bullet. Please clarify and rectify this contradiction.
104.	IV	6	6.3.2.1.1	6-33 to 6-35		The discussion on the CMA requiring the preparation of a Water (Groundwater) Supply Assessment is generally thorough in its extent, with the exception that no specific mention is made of requiring the use of numerical groundwater modeling techniques to evaluate the potential impacts that might result from groundwater extraction associated with a proposed renewable energy project. Numerical groundwater modeling is the most reliable means of estimating the potential individual and cumulative water level drawdown effects of interest noted in this discussion (e.g., extent of drawdown cone(s), capture of groundwater discharging to springs/streams/water-dependent vegetation, migration of poor-quality groundwater, etc.). Groundwater modeling can also be used to refine preliminary water budget estimates for a basin. The NPS recommends this discussion be revised to clearly indicate that numerical groundwater modeling will be required, where possible, to evaluate such impacts. Additionally, the discussion should make it clear that the project proponent(s) will be required to collect sufficient basin-specific hydrologic data, as necessary, to support modeling efforts, as best-available data are

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						usually lacking or non-existent in many of these basins.
105.	IV	6	6.3.3.1.1	6-50		The discussion for Impact GW-2 cites the total water use for the Imperial Borrego Valley ecoregion as 10,000 afy, but Table IV.6-3 cites a value of 88,000 afy. A similar problem was observed in the discussion for Impact GW-3. Likewise, similar inconsistencies between reported table and text values (water use and acreages) are seen in subsequent impact assessment discussions for the remaining alternatives. Please double-check and correct these discrepancies here and in subsequent sections.
106.	IV	6	6.3.6.7.1	6-103	2nd	Recommend expanding the discussion in the second paragraph in this section to be consistent with similar discussions presented for all previous alternatives. A one sentence summary stating Alternative 4 uses the same amount of water as the Preferred Alternative is insufficient evaluation of the potential effects. In fact, a similar one sentence evaluation could have been used for similar discussions presented for all of the other alternatives since the amounts of water used between the different alternatives ranged only from 90,000 acre-feet per year to 92,000 acre-feet per year, but a more thoughtful analysis was presented instead. We recommend a similar thoughtful analysis be presented here to be consistent with previous similar discussions.
107.	All					Most maps provided in the DRECP do not illustrate NPS boundaries or label NPS units. The NPS requests clear, labeled mapping of NPS units that will allow stakeholders to understand and comment on likely effects to NPS resources.
108.	III	7	7.5.4			Information on pup fish is lacking. Because this is an endangered species that is highly sensitive to changes in hydrology, such as groundwater withdrawals contemplated by many solar projects, NPS recommends additional discussion of the Desert Hole Pupfish, especially within the fish section in Vol. III. 7.5.4.
109.	III	11	11.2.1	5	Map	Manzanar National Historic Site is not shown on map. Please show units of the NPS and NPS-administered National Historic Trail Corridors on maps so that decision-makers and the public are aware of the potential impacts, both positive and adverse, to NPS resources and the visitor experience.
110.		IV.1 Table IV.1-4			Preferred Alternative	In the Alternative / Acres Variance Lands Location of DRECP Variance Lands section, the NPS is concerned about potential resource impacts from the proposed variance lands in these two locations: <ul style="list-style-type: none"> <li>• East of Highway 395, north of Independence in Inyo County</li> <li>• South of Sandy Valley along the California/Nevada state line.</li> </ul> Please work with NPS to identify specific resource protections and revise variance land criteria to protect these areas.
111.			Amargosa /Grimshaw SRMA	3	Other programs	It seems contradictory to say that “renewable energy development is not an allowable use in SRMAs due to the incompatibility of use” and then state an exception may be allowed on a case-by-case basis if the proposed project is found to be compatible with the specific SRMA values.” Please clarify which SRMA areas have values that would be compatible with renewable energy development. Please also clarify what the criteria would be for making an exception within a SRMA.
112.			Amargosa South ACEC	1	All	The NPS supports the expansion of this ACEC and designation as an NLCS unit. This area has many connections to the greater history and ecology of Death Valley National Park. Death Valley National Park commends the plan’s attention to the historic resources found in the area, especially the Old Spanish Trail which also has ties to the history of Death Valley National Park. Moreover, the park also asserts that the ACEC and NLCS designations will protect the area from excessive groundwater withdrawals. Groundwater pumping in this area is

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						likely to intercept water that would otherwise discharge at Death Valley NP’s Saratoga Spring, or the springs which sustain flow in the lower Amargosa River which drains into the park.
113.			Amargosa North ACEC		All	The NPS strongly supports the ACEC and NLCS designations for the Amargosa North unit. This unit is hydraulically connected to the Amargosa Desert Hydrographic Basin in Nevada, which is experiencing significant water level declines due to over-pumping. Groundwater level declines in the Amargosa Desert threaten to adversely impact the senior Federal water rights held for Devils Hole (NPS) and the springs in Ash Meadows (USFWS). Groundwater declines in the Amargosa Desert are also believed to be contributing to decreasing rates of discharge in the Furnace Creek area springs, which are the largest springs in Death Valley. Death Valley NP asserts that the ACEC and NLCS designations for the Amargosa North unit will protect this area from excessive groundwater withdrawals that may compound the depletion of the regional groundwater flow system.
114.			Amargosa North ACEC	5	2 <sup>nd</sup> column	Suggestion correction of typographical error: “Nelson’s biorhorn sheep”
115.			Cerro Gordo-Conglomerate Mesa	1	2	The NPS supports the NLCS designation for this culturally /ecologically rich area. The biological resources that exist in the unit are unique and deserve additional protection. The cultural resources in the area are important to the understanding of the dynamic mining history that is an integral part of the greater Death Valley Area.
116.			Denning Spring	1	Table	The NPS supports the NLCS status as shown in Alternative 2. Please incorporate the proposed designations in Alternative 2 into the Preferred Alternative. We do recognize and support the continuation of the ACEC designation for the future if not additionally designated as NLCS.
117.			Kingston Range	1	Table	The NPS commends the plan for the consideration of the 11,300 acres proposed for NLCS designation.
118.			Panamint/Argus	1	Goals	The NPS also recognizes the connectivity between wildlife populations and sees that this land unit is vitally important as a corridor for such species as mountain Lions, bighorn sheep and others. Additionally, the Panamint Valley plant species need more protection as do the rich cultural resources of the unit. The protection of these values contributes to the landscape-scale holistic resource protection of the Greater Death Valley area. The NPS supports the designations shown in Alternative 2. Please incorporate the proposed designations of Alternative 2 into the Preferred Alternative.
119.	III.9 IV.8		Native American Issues			The NPS is concerned that some tribes may not have adequate staff and resources to review the document, and therefore their concerns may be unrepresented or under-represented. The NPS suggests additional outreach to hear from the tribes whether they had capacity to review the document in the public comment period. If tribal staff have been unable to review the document, the NPS suggests an extended government-to-government consultation to achieve representation of tribal concerns.
120.	All					A hyperlinked Table of Contents within each volume would facilitate reading and understanding of DRECP documents.
121.	2	3	1.2.5.2	28	2	In regards to <b>AM-PW-1:</b> The document should note what mitigations exist to protect new-to-science, new-to-California species, or future species status changes that have yet to be evaluated for legal protective status during siting/reconnaissance surveys.

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122.	2	3	1.2.5.2	31	6	In regards to <b>AM-PW-7</b> , “locally and genetically appropriate material” criteria should be clarified as to what will be considered “local” and “genetically appropriate.” Uncertified (undocumented source location) seed source material should not be used. Seed source location should be compatible with Seed Transfer Zones for project site. If none readily available, seeds from species planned for restoration activities should be harvested on-site prior to disturbance.
123.	2	3	1.2.5.2	34	10	In regards to <b>AM-PW-11</b> , the document should note which invasive and non-native plants will be managed.
124.	2	3	1.2.5.2	34	10	In regards to <b>AM-PW-11</b> , the document should describe what will occur if invasive and non-native plants are already present in project site, and whether developers will be required to eradicate all invasive and non-native plants prior to construction.
125.	2	3	1.2.5.2	37	8	In regards to <b>AM-PW-15</b> : The document should note what protections, if any, are being put into place to avoid over-use of herbicides - not just in areas that have a high risk for groundwater contamination but within the project site in general. Mechanical methods should be used to control and eradicate invasive plant species when feasible. This should involve hiring crews to perform seasonal weed pulling.
126.	2	3	1.2.5.3	41	2	In regards to <b>AM-LL-3</b> : Covered activities and other developments should also avoid an <i>increase</i> in sand- bearing sediments within the aeolian system that may adversely affect the ecological function of dune systems (e.g. disturbed areas such as access roads and fire-breaks around structures can increase transported sand).
127.	2	3	1.2.5.4	60	3	In regards to <b>AM-DFA-PLANT-3</b> : “DRECP disturbance cap” is not in the Glossary of Terms, and its usage here appears to have a slightly different meaning than the “BLM Disturbance Cap” in the Glossary of Terms. The NPS recommends the document supply a definition for “DRECP disturbance cap.” Suggested elements could include: <i>DRECP disturbance cap – Limit on ground-disturbing activities within the suitable habitat for Covered Species as called for in the Conservation Management Actions. Expressed as a percentage of total Covered Species suitable habitat acreage and cumulatively considering past, present and future disturbance. Baseline (past and present) disturbance would be determined by the most current imagery and knowledge at the time of an individual project proposal, and informed also by previous estimates of disturbance.</i>
128.	2	3	1.2.5.4	60	3	In regards to <b>AM-DFA-PLANT-3</b> and <b>Appendix Q</b> : The suitable habitat models for Covered Plant Species include large areas of highly disturbed urban areas. On the Data Basin site, datasets were generated displaying habitat intactness for the suitable habitat models. The NPS cannot determine if or how the datasets were analyzed and incorporated into decision-making regarding CMA’s. In particular, the alkali mariposa lily ( <i>Calochortus striatus</i> ) suitable habitat model for this species includes much of the urban development around Lancaster. Based on the Habitat Intactness Model for this species from Data Basin, areas of high (moderately high, high and very high) intactness should be conserved more rigorously than areas of low (moderately low, low, very low) intactness. Disturbance caps for suitable habitat areas with Moderately high, high or very high intactness should have disturbance cap of 1%, and Suitable habitat with

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						moderately low, low or very low intactness could have a disturbance cap of up to 10%.
129.	2	3	1.2.5.4	60	3	In regards to <b>AM-DFA-PLANT-3</b> and <b>Appendix Q</b> : Please explain the reasoning behind using only “occupied habitat” for the Bakersfield cactus. Confining this species to its current location will hinder its ability to expand if favorable conditions occur, or migrate if responding to climatic changes.
130.	2	3	1.2.5.4	60	3	In regards to <b>AM-DFA-PLANT-3</b> and <b>Appendix Q</b> : “Occupied habitat” for Bakersfield cactus not defined. Please clarify: Is this term defined as the “setback limit” on individuals found during habitat assessments? Or is this habitat based on the Predicted occupied habitat models on Data Basin?
131.	2	3	1.2.5.4	60	3	In regards to <b>AM-DFA-PLANT-3</b> and <b>Appendix Q</b> : Please explain why the UCSB Predicted Occupied Habitat models for the Bakersfield cactus (Data Basin) are not displayed anywhere in the DRECP or its appendices. This information is critical to the project, please display it or specifically note that the models are on the Data Basin site.
132.	2	3	1.2.5.4	60	3	In regards to <b>AM-DFA-PLANT-3</b> and <b>Appendix Q</b> : For quality assurance and accuracy, specify the parameters used for each species in suitable habitat modeling. This information is not located on Data Basin site or in Appendix Q.
133.	2	3	1.2.5.7	86	2	On the 3 <sup>rd</sup> line in paragraph 2, “...calculated compensation acreage, a corresponding fee paid by [missing word] to the DRECP...” Writers have omitted who should pay the fee. Please correct this by writing out “project developers” or define another specific party who is supposed to pay the fee.
134.	I	I				Please clarify how NLCS status would add protections to areas already designated as ACEC’s, critical habitat, or Wilderness Study Area.
135.	I	I				The NPS recommends a summary section with comparison table early in the document that briefly and succinctly explains the approaches of each action alternative: Preferred, Action 1, Action 2, Action 3, and Action 4. Readers had great difficulty distinguishing between the action alternatives, the goals/objectives behind each, why they were selected for analysis and not others, and what they contribute to a robust NEPA process. An informative summary is found in Volume IV, IV.27 Comparison of Alternatives. Please make this table available on the main website and also at the beginning of the document where the typical reader would expect to be introduced to the analysis.
136.	Appendix L Afton Canyon					Please explain how the predicted impacts of the proposed Soda Mountain Solar Project are incorporated into the cumulative effects analysis, the climate change analysis, and the NCCP. The Soda Mountain Solar project will result in significant adverse impacts, some of which will be unmitigable and irreversible. The potential impacts from the Soda Mountain Solar Project and agency Preferred Alternative seem inconsistent with the goals of the DRECP and Secretarial Order No. 3330. Moreover, if built, the project may create a new set of conditions for analysis within the DRECP.
137.	Appendix L Afton Canyon				Objective: Improve Habitat for Bighorn Sheep	Additional water alone does not equate to improved desert bighorn sheep habitat. Please explain how supplemental water would be established for sheep that would not be detrimental to the sheep or other species.

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138.	Appendix L Bristol Mountain					Reference should be "Mojave fringe-toed lizard."
139.	Appendix L Bristol Mountain				Special Status Species: Desert Bighorn Sheep	The NPS recommends the Plan avoid focusing on the use of artificial water for mitigation. The DRECP is a landscape scale document, with emphasis on protecting existing wildlife connectivity corridors, rather than creating linkages via man-made facilities. Moreover, artificial water sources, when used without proper study or planning, could draw the sheep into areas in which they could be subject to higher mortality (e.g. car collisions), and their use could be detrimental to other species.
140.	Appendix L Castle Mountains					There is no distinction of impacts among the five alternatives except for Alternative 4, which indicates the Piute-Fenner ACEC as state lands.
141.	Appendix L Chemehuevi					Please analyze in Appendix L or in Chapter Four how the change from Desert Wildlife Management Area to ACEC or NCL lands status will affect BLM and NPS resources in the vicinity.
142.	Appendix L Clark Mountain					North and north-west of Mojave National Preserve/Clark Mountain unit, the landscape is freckled with variance lands where renewable energy development would result in immediate, potentially significant visual intrusions to the scenic values of Clark Mountain. The NPS is concerned about potential impacts to the visitor experience and visual resources of Clark Mountain if these variance lands are developed. Please discuss likely resource impacts in the Chapter Four Visual Resources section. Also, please work with the NPS to identify variance criteria that could eliminate the potential impacts from variance land development in this region.
143.	Appendix L Ivanpah					The NPS foresees impacts to NPS resources from potential development in the Future Assessment Area in the Kokoweef Peak cutout adjacent to the MOJA boundary. Please analyze and discuss likely impacts in the realms of visual, cultural, biological, and recreational resources of Mojave National Preserve if the Future Assessment Area is used for renewable energy development.
144.	Appendix L Ivanpah				Livestock grazing	Is the entire allotment vacant or just the portion on BLM lands? If not entirely vacant, it does not seem reasonable to presume this to be an option.
145.	Appendix L Mountain Pass Dinosaur Trackway					This area is adjacent to Mohave National Preserve; the NPS is opposed to the Preferred Alternative's apparent placement of a DFA adjacent to the Preserve for reasons stated earlier. The map in Appendix L appears to show a DFA, however; other maps reflect a Future Assessment Area in the Preferred Alternative in this area. The NPS is concerned about potential development because of associated potentially significant adverse impacts to this important paleontological resource.
146.	Appendix L Piute-Fenner					The NPS supports the DRECP Preferred Alternative for this area, as it offers maximum protection for nationally significant values in Piute-Fenner ACEC. All action alternatives offer significant protection to these lands.
147.	Appendix L Shadow Valley					The NPS is opposed to a DFA in the western portion of Silurian Valley. Renewable energy development in this location is likely to permanently breach any remaining potential for wildlife connectivity between the Avawatz and Soda Mountains.
148.	II.III Preferred Alternative			5	Map Legend Definitions	Legislatively and Legally Protected Areas should refer either to "units of the National Park Service" or to "National Parks, National Monuments, National Preserves, National Recreation Areas, and National Historic Sites" rather than to "National Parks and National Preserves."

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149.	II.III Preferred Alternative			7	Figure II.3-1	Please explain the rationale behind the separation of the Kokoweef Peak BLM lands into three designations -- ACEC, NLCS, and FAA.
150.	Appendix C BGOs	Table C-1	Landscape Features and Habitat Connectivity	C-9 (11)	Objective L1.2	Please explain how the design landscape linkage corridors were determined to be 3 miles wide where feasible, or at least 1.2 miles wide otherwise. It references the CDFW's California Natural Diversity Database, but does not explain the reasoning behind these desired measures.
151.	Appendix C BGOs	Table C-1	01. Agassiz's Desert Tortoise – Gopherus agassizii (DETO)	C-21 (23)	Objective DETO1.2	Please explain whether "no net loss" guarantees the same quality for same quality of habitat (Cat I for Cat I), and whether it allowsswapping out lower quality habitat for higher quality habitat.
152.	Appendix C BGOs	Table C-1	01. Agassiz's Desert Tortoise – Gopherus agassizii (DETO)	C-21 (23)	Objective DETO1	Mojave National Preserve is listed as part of the conservation area. The NPS has jurisdiction by law for management of Mojave National Preserve. Therefore, in order for the DRECP to make decisions for management of resources on NPS lands, the NPS would need to adopt the EIS or parts of it, and sign its own Record of Decision. Before doing so, the NPS, and more specifically, Mojave National Preserve would need a higher level of input and collaboration than has occurred to date with regard to the desert tortoise. The NPS requests further discussions regarding this issue. Alternatively, the document could incorporate current NPS management of the desert tortoise, which would not require NPS to sign its own ROD because NPS would not be making any new decisions with regard to the desert tortoise; exploring this option, however, would require further collaboration and discussion between the agencies regarding desert tortoise management than what has taken place to date.  NPS further notes that the issue of jurisdiction by law for management of units of the National Park System likewise applies to any other activities, including conservation actions, that are proposed or anticipated by the DRECP.
153.	Appendix C BGOs	Table C-1	17. Willow Flycatcher (WIFL)	C-32 (33)	Goal WIFL1	Piute Creek in the Preserve is suitable habitat for the southwestern willow flycatcher, so it should be listed here.
154.	Appendix C BGOs	Table C-1	20. Mohave Tui Chub – (MTCH)	C-34 (36)	Objective MTCH1.2:	West Pond (a.k.a. Three Bats Pond) is potential habitat cited in the Mohave Tui Chub Recovery Plan.
155.	Volume III.07	Biological Resources				The tables listing T&E species by DRECP ecoregion subarea indicate Mohave tui chub in several subareas, with habitat totaling several hundred acres,when, in fact, the tui chub exists in extremely limited habitats at Zzyzx/Soda Lake east of Soda Mountains (Mojave/Silurian Valley); Morning Star Mine pond (Ivanpah Valley); Camp Cady; China Lake NAWS, and Academy for Academic Excellence in Apple Valley, CA. The Mohave tui chub scientific community knows exactly where the chub exists, so presence of chub in these subareas needs to be

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						verified and more accurate estimates of chub habitat specified in the DRECP.
156.	Appendix M					This appendix considers impacts to Mohave tui chub habitat from ground disturbance, but does not consider impacts to Mohave tui chub habitat from water removal and subsequent habitat change (i.e., lower water levels due to groundwater use). Please include analysis of impacts to Mohave tui chub habitat and populations from water withdrawals related to renewable energy development, in the construction and operation phases.
157.	I	1	I.0.1	I.0-1	1	The DRECP document states that “[t]he <i>Desert Renewable Energy Conservation Plan (DRECP or Plan)</i> is a comprehensive plan that provides for renewable energy and <b>transmission development</b> projects and for the conservation of sensitive species and ecosystems in California’s Mojave and Colorado/Sonoran deserts.”  NPS is unable to find impacts analysis for transmission development and NPS resources. Please include analysis of impacts of planned and foreseeable transmission.
158.	I	3	I.3.1.1	I.3-1	3	The distribution of power that will potentially be generated from the proposed renewable energy projects that are to be sited within the DRECP boundary would require transmission lines to export that energy to loads and markets within the greater power grid. However, it is not until Section I.3.2.2 on page I.3-9 is the reader made aware as to how transmission will be handled in the analysis. Please address in the analysis the conservation of natural, cultural and historic resources with respect to Transmission Lines on non-BLM-managed lands as presented in the “Conceptual Transmission Plan” (Appendix K) of the document.
159.	I	3	I.3.2.1	I.3-5	1	Due to the length and complexity of the Plan, many readers only review a small portion of the document. Please spell out acronyms in their first use within a section more frequently within the document. Please spell out what “BGO” stands for within this section.
160.	I	3	I.3.2.1	I.3-5	1	This paragraph states that “[t]he <i>DRECP Plan-Wide Conservation Strategy</i> is the Plan-wide description of how to achieve Plan-wide BGOs in the Plan Area. The Plan-wide BGOs, biological Conservation Planning Areas, biological Conservation Priority Areas, BLM Conservation Lands, and DRECP biological conservations actions are the essential elements of the DRECP Plan-Wide Conservation Strategy. The NCCP Conceptual Plan-Wide Reserve Design is the envelope defining high-priority resources needing the most durable protection and management. This envelope includes the Legislatively and Legally Protected Areas (LLPAs), BLM LUPA conservation designation lands with durability tools and/or management agreement, <b>and biological Conservation Priority Areas on non-BLM lands</b> . The NCCP Conceptual Plan-Wide Reserve Design reflects the highest priority areas for the creation and long-term management of habitat reserves for the conservation of the 37 proposed Covered Species and representative examples of the natural communities and processes that support the Covered Species in the Plan Area.”  Please analyze how resources such as cultural, historic, visual, recreational, night skies and soundscapes will be impacted if the “biological Conservation Priority Areas” are purchased and contribute to the functioning conservation landscape. Also, please discuss the different outcome for the abovementioned resources if renewable energy development is developed to the extent projected in the document and the biological Conservation Priority Areas are not conserved.

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161.	II	II	All Action Alternatives			<p><b>GENERAL STATEMENT:</b> For the DRECP Preferred Alternative and Alternatives 1, 2, 3, and 4, it appears that a proposed 500-kV transmission delivery line would be sited nearby and within Joshua Tree National Park (according to the maps provided), which is managed by the National Park Service. It appears that a proposed 500-kV transmission delivery line would also be sited immediately outside of the Mojave National Preserve for Alternative 2 according to the maps provide. However, it is unclear if the proposed line in Alternative 2 would actually cross into the Mojave National Preserve. Additionally, for the DRECP Preferred Alternative and Alternatives 1, 2, 3, and 4, it appears that a proposed 230-kV transmission would also be sited in the vicinity of the Manzanar National Historic Site, but it is unclear in the maps provided as to whether it would impact Manzanar by traversing NPS-managed lands at that location or by impacting the viewshed with tall structures near the National Historic Site.</p> <p>Because NPS owns these lands associated with Joshua Tree National Park, the Mojave National Preserve, and Manzanar National Historic Site, a right-of-way (ROW) permit from NPS would be required in order to construct and operate these portions of the proposed transmission lines, 16 U.S.C. §§ 5 &amp; 79, should they cross NPS lands. Under NPS applicable laws and regulations, a ROW is a permit issued by the NPS to a third party to pass over, under, or through NPS property. A ROW permit is a discretionary and revocable document and, unlike a deeded easement or fee simple ownership, does not convey or imply any interest in the land. In addition, a ROW permit may only be issued under certain, stringent circumstances. According to Section 8.6.4.1 of NPS Management Policies, ROW permits are usually only issued pursuant to specific statutory authority, and only upon determination there is no practicable alternative to such use of NPS lands. Moreover, under the NPS Organic Act (16 U.S.C. § 1) the NPS is under congressional mandate not to allow any use of NPS land that would impair or be a derogation of the values and purposes for which the park was authorized or be incompatible with the public interest, except when authorized by Congress.</p> <p>Although electric transmission infrastructure through park units are authorized by 16 U.S.C. 79, their installation, operation, and maintenance activities within the park boundary are subject to NPS ROW regulations described in 36 CFR Part 14. Importantly, these regulations apply to federally-owned or controlled lands administered by the NPS, including the subsurface, and to nonfederal lands and waters within the park which the NPS administers for public use purposes via a written instrument such as an agreement (see 36 CFR Section 1.2(a)(2)). The NPS Management Policies further set out criteria to meet the approval requirements in the regulations (see NPS Management Policies Sections 8.6.4.1, 8.6.4.2, and 8.2). These criteria are: compatibility with the public interest, the lack of a practicable alternative location, and no unacceptable impacts to park resources, values, or purposes.</p> <p>A site-specific environmental review for the impacts from the proposed transmission lines would be required under NEPA before a ROW permit may be fully considered and potentially approved. In October 2009, the Department of the Interior was one of nine federal signatories to a Memorandum of Understanding (MOU) “<i>Regarding Coordination in Federal Agency Review of Electric Transmission Facilities on Federal Lands.</i>” In brief, the MOU requires the participating agencies to streamline NEPA review and related permitting processes when possible. In accordance with Executive Order 13604, any lead federal agency would need to coordinate with the NPS on</p>

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						becoming a cooperating agency under National Environmental Policy Act (NEPA), and consult fully with the NPS establishing an agreed-upon project schedule, identifying and obtaining relevant data, resolving issues and concerns, and ensuring the environmental review meets the NPS legal mandates and standards on which the NPS can rely in making a decision on whether to issue a NPS permit. These considerations should be included in the document.
162.	II	1	II.3.1.1	II.3-1	2	<p>This section states that “[u]nder the Preferred Alternative for the DRECP and EIR/EIS, a conservation strategy for the Plan Area would be established that includes a streamlined process for the permitting of renewable energy and <b>transmission</b> development on both federal and nonfederal lands and a BLM LUPA providing Conservation and Management Actions (CMAs) for resources throughout the Plan Area on BLM-administered lands. At the broadest Plan-wide level, the Preferred Alternative includes the following components defined below: Development Focus Areas (DFAs), Study Area Lands, and the DRECP Plan-Wide Reserve Design Envelope.”</p> <p>It is not clear to NPS how the impacts of Transmission will be analyzed and mitigated for outside of BLM-administered lands with respect to natural, cultural and historic resources for all Alternatives being presented. Please address this in the document.</p>
163.	II	1	II.3.1.2.5.1	II.3-24	4	<p>The second sentence in this paragraph states “Generally, transmission projects within the DFAs would implement the same biological CMAs for Covered Activities in the DFAs and transmission projects in the reserve would implement the same biological CMAs for Covered Activities in the reserve.”</p> <p>This sentence is confusing. Please consider re-writing it to state “Generally, transmission projects within both the DFAs and in the reserve would implement the biological CMAs as defined within the Covered Activities.” Also, the word “generally” makes the applicability of the statement unclear. When and where will the CMA’s be implemented and what will be the exceptions? Please clarify this in the document.</p>
164.	II	1	II.3.1.2.5.1	II.3-24 to 25		<p><b>GENERAL STATEMENT:</b> Regarding Transmission activities, it is difficult to decipher what Conservation and Management Actions (CMAs) for resources will be utilized as the document says the following:</p> <p><i>“Although transmission projects are considered in the biological CMAs for Covered Activities, there are some instances where additional CMAs could be required to accommodate the specific attributes of transmission as a Covered Activity that would be allowable under the Plan in both the DFAs and reserve.”</i></p> <p><i>“transmission projects within the DFAs would implement the same biological CMAs for Covered Activities in the DFAs”</i></p> <p><i>“transmission projects in the reserve would implement the same biological CMAs for Covered Activities in the reserve”</i></p> <p><i>“the CMAs for natural communities and Covered Species in the DFAs would be required to be implemented for transmission projects within the reserve”</i></p> <p><i>“In some situations the natural community and Covered Species level CMAs for the DFAs would be sufficient for avoidance and minimization of transmission projects in the reserve and no additional natural community or Covered Species level CMAs would be required.”</i></p> <p><i>“In other instances additional natural community and Covered Species level CMAs for transmission projects in the reserve would be required to avoid and minimize potential impacts to certain biological resources.”</i></p>

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						Please clarify and simplify which CMA’s will apply for transmission in the different areas, and what kinds of criteria will be applied for the “other instances” in which different CMA’s will apply. A summary table might be helpful.
165.	II		II.3.1.2.5.2	II.3-31 to 32		<p>The NPS recommends further clarification to differentiate between CMA’s that will be applied on BLM lands, and those that will be applied on non-BLM lands.</p> <p>Regarding the Avoidance and Mitigation Measures, <b>AM-PW-7 and AM-PW-11</b>, the NPS recommends expanding the CMA’s to include the following standards on short-term ground disturbance to natural habitats and vegetation for all Alternatives:</p> <ul style="list-style-type: none"> <li>• Avoid tree removal to the extent possible.</li> <li>• Cut or crush vegetation rather than blade in areas that would remain vegetated to maximize the ability of native plants to re-sprout.</li> <li>• Work with the appropriate state/federal agencies to mitigate impacts to federal species of concern, or state-listed species, or protected habitats if impacts are unavoidable. Site-specific mitigation to be determined after a project decision is made and during tower location and design. Measures could include the following: <ul style="list-style-type: none"> <li>○ Ecologically optimizing siting of facilities</li> <li>○ Special construction techniques to minimize soil disturbance</li> <li>○ Seasonal restrictions</li> <li>○ Identifying and securing replacement lands</li> <li>○ Identifying appropriate seed or plant sources for revegetation</li> <li>○ Monitoring and response provisions.</li> </ul> </li> <li>• Seed all disturbed areas to prevent colonization by weeds and facilitate reestablishment of the preconstruction plant community. Use native seed mixtures that consist of locally dominate native species, unless requested differently by the landowner.</li> <li>• Restore compacted soils if needed prior to seeding.</li> <li>• Prepare and implement an Early Detection Rapid Response Plan to control the infestation or spread of noxious weeds that would include the following measures: <ul style="list-style-type: none"> <li>○ Collaborate with the appropriate County Weed Board or County Weed Department and landowners to determine and carry out the best control measures deemed locally effective for weed control during construction and over the life of the line.</li> <li>○ Conduct invasive weed surveys prior to and following construction to determine potential weed spread and appropriate corrective actions.</li> <li>○ Where possible, treat identified infestations prior to construction.</li> <li>○ Pressure or steam wash vehicles and other equipment that have been in weed-infested areas at established wash stations upon leaving the infested areas to prevent spreading weeds to uninfected areas during construction.</li> <li>○ Monitor and treat existing and new infestations during construction on a minimum annual basis and for 3 years after</li> </ul> </li> </ul>

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						<p>construction.</p> <ul style="list-style-type: none"> <li>• Equip all vehicles with basic fire-fighting equipment, including extinguishers and shovels to prevent fires that could encourage weed growth.</li> <li>• Use certified weed-free mulch, if mulch is used for erosion control.</li> </ul>
166.	Appendix H		H.2.2	H-2	Final	<p>The NPS recommends further clarification to differentiate between CMA’s that will be applied on BLM lands, and those that will be applied on non-BLM lands.</p> <p>Regarding the following Avoidance and Mitigation Measure, <b>AM-PW-7</b>, the NPS recommends expanding the CMA to include the following standards on short-term ground disturbance to natural habitats and vegetation for all Alternatives:</p> <ul style="list-style-type: none"> <li>• Avoid tree removal to the extent possible.</li> <li>• Cut or crush vegetation rather than blade in areas that would remain vegetated to maximize the ability of native plants to re-sprout.</li> <li>• Work with the appropriate state/federal agencies to mitigate impacts to federal species of concern, or state-listed species, or protected habitats if impacts are unavoidable. Site-specific mitigation to be determined after a project decision is made and during tower location and design. Measures could include the following: <ul style="list-style-type: none"> <li>○ Ecologically optimizing siting of facilities</li> <li>○ Special construction techniques to minimize soil disturbance</li> <li>○ Seasonal restrictions</li> <li>○ Identifying and securing replacement lands</li> <li>○ Identifying appropriate seed or plant sources for revegetation</li> <li>○ Monitoring and response provisions.</li> </ul> </li> <li>• Seed all disturbed areas to prevent colonization by weeds and facilitate reestablishment of the preconstruction plant community. Use native seed mixtures that consist of locally dominate native species, unless requested differently by the landowner.</li> <li>• Restore compacted soils if needed prior to seeding.</li> <li>• Prepare and implement an Early Detection Rapid Response Plan to control the infestation or spread of noxious weeds that would include the following measures: <ul style="list-style-type: none"> <li>○ Collaborate with the appropriate County Weed Board or County Weed Department and landowners to determine and carry out the best control measures deemed locally effective for weed control during construction and over the life of the line.</li> <li>○ Conduct invasive weed surveys prior to and following construction to determine potential weed spread and appropriate corrective actions.</li> <li>○ Where possible, treat identified infestations prior to construction.</li> </ul> </li> </ul>

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						<ul style="list-style-type: none"> <li>○ Pressure or steam wash vehicles and other equipment that have been in weed-infested areas at established wash stations upon leaving the infested areas to prevent spreading weeds to uninfested areas during construction.</li> <li>○ Monitor and treat existing and new infestations during construction on a minimum annual basis and for 3 years after construction.</li> <li>● Equip all vehicles with basic fire-fighting equipment, including extinguishers and shovels to prevent fires that could encourage weed growth.</li> <li>● Use certified weed-free mulch, if mulch is used for erosion control.</li> </ul>
167.	II		II.3.1.2.5.2	II.3-32		<p>Regarding the Avoidance and Mitigation Measure, <b>AM-PW-8</b>, please consider implementing the following mitigation measure regarding decommissioning of transmission-related facilities for all Alternatives:</p> <ul style="list-style-type: none"> <li>● Require a decommissioning condition for restoration of the site to approximate or improve pre-project conditions, including removal of all transmission-related infrastructure when the project ceases operation.</li> </ul>
168.	II		II.3.1.2.5.2	II.3-35		<p>Regarding the Avoidance and Mitigation Measure, <b>AM-PW-12</b>, please consider implementing the following mitigation measures regarding fire prevention/protection for all Alternatives:</p> <ul style="list-style-type: none"> <li>● Use limitation within the transmission line rights-of-way could include keeping the right-of-way clear of all structures, fire hazards, many vegetation types and any other use that may interfere with the safe operation or maintenance of transmission line(s).</li> <li>● Equip all project vehicles with basic fire-fighting equipment, including extinguishers and shovels to prevent fires that could encourage weed growth.</li> <li>● Fuel all highway-authorized project vehicles off-site to minimize the risk of fire. The fueling of construction equipment that is transported to the project site via truck and is not highway authorized will be done in accordance with regulated construction practices and state and local laws. Helicopters will be fueled and housed at local airfields or at staging areas.</li> <li>● Prepare for fire control plan to protect habitats.</li> </ul>
169.	II		II.3.1.2.5.2	II.3-36		<p>Regarding the Avoidance and Mitigation Measure, <b>AM-PW-14</b>, please consider implementing the following mitigation measures regarding siting and design (specifically for transmission towers and related infrastructure) for all Alternatives:</p> <ul style="list-style-type: none"> <li>● Work with the appropriate state/federal agencies to mitigate impacts to federal species of concern, or state-listed species, or protected habitats if impacts are unavoidable. Site-specific mitigation to be determined after a project decision is made and during transmission line tower location and design. Measures could include the following: <ul style="list-style-type: none"> <li>○ Ecologically optimizing siting of facilities</li> <li>○ Special construction techniques to minimize soil disturbance</li> <li>○ Seasonal restrictions</li> <li>○ Identifying and securing replacement lands</li> <li>○ Identifying appropriate seed or plant sources for revegetation</li> </ul> </li> </ul>

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						<ul style="list-style-type: none"> <li>○ Monitoring and response provisions.</li> </ul>
170.	II		II.3.1.2.5.3	II.3-41 to 43		<p>Regarding the Avoidance and Mitigation Measure, <b>AM-LL-4</b>, please clarify which measures would be required, and how the required measures are likely to be different on BLM and non-BLM lands. Please include or reference the location of the eagle conservation plan so that readers can determine what will be done to protect eagles from project and transmission impacts. Please also expand the consideration of transmission. Measures to consider and include could be:</p> <ul style="list-style-type: none"> <li>• Installing lines in areas of high bird use or migration is the biggest factor in avian collisions. Transmission lines with a flat configuration (the conductors are on the same horizontal plane) are easier for birds to avoid, while lines that have the conductors stacked (the same vertical plane) can create a fence effect and are harder for birds to avoid. This fence effect can also be created by locating lines next to each other. Therefore, the design of project transmission lines should be of the flat configuration in areas where higher concentrations of birds are exhibited.</li> <li>• Install bird diverters on overhead ground wires in high risk areas (over river and stream crossings and near wetlands).</li> <li>• In locations where nests for special-status species have been identified, determine transmission line construction schedules through consultation with State Department of Fish and Wildlife to avoid breeding season disturbance. Noise during transmission line construction could impact bird and bat usage, and therefore appropriate noise muffling devices should be employed during nesting periods and during the breeding season.</li> </ul>
171.	II		II.3.1.2.5.4	II.3-52		<p>Regarding the Avoidance and Mitigation Measure, <b>AM-DFA-DUNE-1</b>, please expand the requirements regarding siting and impact reduction of transmission lines and related infrastructure with respect to impacts on dune natural communities for all alternatives. Please add specifics in the following topic areas.</p> <ul style="list-style-type: none"> <li>• Work with the appropriate state/federal agencies to mitigate impacts to federal species of concern, or state-listed species, or protected habitats if impacts are unavoidable. Site-specific mitigation to be determined after a project decision is made and during transmission line tower location and design. Measures could include the following: <ul style="list-style-type: none"> <li>○ Ecologically optimizing siting of facilities</li> <li>○ Special construction techniques to minimize soil disturbance</li> <li>○ Seasonal restrictions</li> <li>○ Identifying and securing replacement lands</li> <li>○ Identifying appropriate seed or plant sources for revegetation</li> <li>○ Monitoring and response provisions.</li> </ul> </li> </ul>
172.	II		II.3.1.2.5.4	II.3-62		<p>Regarding Table II.3-62, where the DRECP document states that DFA Setbacks for the California condor will “<i>Setback wind and transmission projects 5 miles from nest sites,</i>” please also address the potential impacts to condor and setbacks that may be needed from access roads that may be necessary to support either wind facility and/or transmission line projects.</p>
173.	II		II.3.1.2.5.4 and II.3.1.2.5.5	II.3-63 to 80		<p>Regarding the Avoidance and Mitigation Measure, <b>AM-DFA-ICS-5</b>, it is stated within the DRECP document that “<i>Covered Activities, except for transmission projects in existing transmission corridors, will avoid the desert tortoise conservation areas (TCAs) and the desert tortoise</i></p>

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						<i>linkages identified in Appendix H, except the portion of the TCA in the northern Fremont Valley converted to intensive agriculture prior to 2013.”</i> Please describe what the Avoidance and Mitigation Measures will be utilized for the desert tortoise with respect to <u>new transmission line projects</u> and <u>new transmission line corridors</u> . Please further clarify for <b>AM-RES-BLM-ICS-2, AM-RES-BLM-ICS-3, AM-RES-BLM-ICS-2, AM-RES-BLM-ICS-2, and AM-RES-BLM-ICS-2</b> with respect to new transmission lines and corridors (not existing ones).
174.	II		II.3.1.2.5.5	II.3-76		Regarding the Avoidance and Mitigation Measure, <b>AM-RES-BLM-ICS-10</b> , the DRECP document states that <i>“significant new ground disturbance, excluding transmission projects in designated and new utility corridors, will not negatively affect access and use to known or potential water sources used by bighorn sheep.”</i> Please clarify whether the impact analysis considers the impacts of new transmission projects in designated and new utility corridors to be temporary or permanent, and also what impacts new transmission projects in designated and new utility corridors are expected to cause for bighorn sheep.
175.	II		II.3.1.2.5.4 and II.3.1.2.5.5	II.3-63 to 80		Regarding desert bighorn sheep and the Mohave ground squirrel, there are no Avoidance and Mitigation Measures found that identify disturbance of these species due to the construction of new transmission lines and related infrastructure (access roads, substations, etc.). Please add specific CMA’s for transmission impacts to these and other Covered Species. Suggestions for specific CMA’s include: <ul style="list-style-type: none"> <li>• Mohave ground squirrel –avoid construction activities within 0.25 miles of active burrow nests during the breeding season (emerge from hibernation in February; and breeding season takes place during February and March with gestation occurring through late April).</li> <li>• Desert bighorn sheep–avoid disturbance to lambing season which typically occurs from February through March should any birthing activity be occurring within the project area.</li> </ul>
176.	IV	IV				<b>GENERAL COMMENT:</b> Regarding the planning/design, construction, and operation and maintenance of new transmission lines and related infrastructure (access roads, substations, etc.), please evaluate impacts for the following resource areas, at minimum: <ul style="list-style-type: none"> <li>• Geologic Resources (including Geology, Paleontology, Soils, and Rare and Unique Geologic Features)</li> <li>• Land Use</li> <li>• Recreation</li> <li>• Visual Resources</li> <li>• Water Resources and Wetlands</li> <li>• Fish, Vegetation, and Wildlife (including impacts to Avian species within the Pacific Flyway, the Salton Sea, and the Sonny Bono Wildlife Refuge)</li> <li>• Air Quality and Greenhouse Gases</li> <li>• Cultural Resources</li> <li>• Socioeconomics and Environmental Justice</li> <li>• Noise</li> <li>• Night Skies and Light Intrusion</li> </ul>

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						<ul style="list-style-type: none"> <li>• Public Health and Safety including EMF Analysis</li> <li>• Transportation</li> </ul>
177.	II	II	2.3		Figure II.3-1	<p>Although the new protections through the Clark and Kingston Mountains area will be beneficial in the Preferred Alternative for habitat connectivity between Mojave National Preserve and Death Valley National Park, the proposed protection is likely to be inadequate for desert bighorn sheep. Recent work by Creech et al. (2014) confirms California Department of Fish and Wildlife biologist judgment decades ago that the Soda Mountain area is a crucial habitat linkage, currently disrupted by Interstate 15, between the metapopulation segments to the north and south of the freeway (see Figure 1). Creech et al. (2014) found four potentially restorable habitat linkages across I-15, three of which are genetic (meaning movement of rams only) while only one at Soda Mountain is demographic (meaning movement of both ewes and rams). The DRECP Preferred Alternative provides insufficient protection to this high priority restorable demographic linkage for bighorn sheep at Soda Mountain since the area to the south of I-15 at Soda Mountain is left undesignated. There is a potentially restorable genetic linkage that crosses from the Mescal Range northwards towards Clark Mountain, but this linkage is left unprotected (and potentially impacted) by the Future Assessment area in the north end of the Mescal Range. Thus the protections provided by the DRECP alternative for habitat connectivity between Mojave National Preserve and Death Valley National Park would be limited to a single potentially restorable genetic corridor that runs from Halloran summit north of Baker to the Kingston Range. To effectively restore demographic connectivity between the metapopulation segments to the north and south of the freeway, the NPS recommends ACEC or NLCS designation for the Soda Mountain area in the DRECP.</p> <p>Creech, T.G., C.W. Epps, R.J. Monello, and J.D. Wehausen, 2014. Using network theory to prioritize management in a desert bighorn sheep metapopulation, Landscape Ecology DOI 10.1007/s10980-014-0016-0.</p>
178.	II	II	2.3		Figure II.3-1	<p>Averill-Murray et al. (2013) analyzed least-cost corridors for desert tortoise habitat connectivity (see Figures 2 and 3). Connectivity from south to north exists both on the east and west sides of Joshua Tree National Park. Connectivity from the west side of the Park links the Pinto and Ord-Rodman Desert Wildlife Management Areas (DWMA). Northward connectivity also exists between the Ord-Rodman DWMA and Mojave National Preserve. South to north habitat connectivity might become increasingly important with advancing climate change. The DRECP Preferred Alternative provides protection to the linkage between Mojave National Preserve and the Ord-Rodman DWMA, but the utility of this linkage could be diminished if the corridor through Lucerne Valley linking Pinto and Ord-Rodman is blocked by energy development. Development on the desert tortoise corridor that runs through Lucerne Valley could leave only south to north connectivity on the east side of Joshua Tree National Park in the Mojave Desert for conservation of the desert tortoise. The NPS recommends further analysis of the Future Assessment Area and the potential effects on this desert tortoise connectivity.</p> <p>Averill-Murray, R. O. Y. C., Darst, C. R., Strout, N., &amp; Wong, M., 2013. Conserving population linkages for the Mojave Desert Tortoise (<i>Gopherus agassizii</i>). Herpetological Conservation and Biology, 8(1), 1-15.</p>
179.	II	II	2.3		II.3-2	Future Assessment Areas are said to be of moderate to low conservation value where energy development value is “ambiguous.” Please

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						explain how was the “moderate to low” conservation value was determined. For example, in the Preferred Alternative there is a FAA located in the Kokoweef area just south of Mountain Pass Mine. All of the polygons immediately surrounding this FAA are considered to have high conservation value (Mojave National Preserve and areas proposed under the Preferred Alternative to be ACEC or NLCS). It would be helpful if the document included a description of each FAA and the analysis used to arrive at the finding of moderate to low conservation value.
180.	II	II	2.7		Figure II.7-1	Alternative 4 shows variance lands along I-15 on the western boundary of Mojave National Preserve just north of Baker, CA and continuing south towards Zzyzx and Rator Roads. The screening criteria say that variance lands are outside a 5-mile buffer from the centerline of National Historic Trail Corridors but the documents reflect that some variance lands are nonetheless located within this area. Examination of the Old Spanish National Historic Trail shows it coming south to Baker just west of 127 to join with the Mojave Road at Soda Springs. Proper application of this screening criterion would eliminate some of these mapped variance lands.
181.	II	II	1.3.1.1	2	2	Designations for Future Assessment Areas (FAA’s) near or adjacent to historic trail resources are not analyzed in the DEIS, and are of concern to the Nation Park System as administrators of the National Historic Trails and associated resources. There is an FAA near the Juan Bautista de Anza National Historic Trail (Anza Trail) corridor to the west of Andrade and Fort Yuma Indian Reservation that could impact the trail's visual and recreation resources if designated as a development area. Currently, this FAA is relatively undisturbed desert wash and provides an opportunity for visitors using the auto route to experience the landscape settings of the expedition. Development would be visually intrusive and isolated from other proposed DFAs. In addition, the Anza Trail recreation trail is planned to continue stateside through this area and development would impact a trail users recreation opportunity and experience. The trail corridor just east of the FAA is densely populated with cultural resources and part of a major milestone of the trail, the crossing of the Colorado and Gila Rivers with the assistance of Chief Palma and the Quechan Tribe. Please analyze potential impacts from this FAA to the trail and to cultural resources in Chapter Four. The NPS recommends conservation of this area.
182.	II	3	1.3.7.2	2	3	The National Trails System Act, as amended, defines National Historic Trails as “extended trails which follow as closely as possible and practicable the original trails or routes of travel of national historical significance.” Such trails have as their purpose “the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment.” The National Park Service, with support of community groups along the trail corridor, completed the feasibility study of the Juan Bautista de Anza National Historic Trail (Anza Trail) in 1986, determining that the Anza Trail met the following criteria of the National Trails System Act: <ol style="list-style-type: none"> <li>1. It was established by historic use and is historically significant as a result of that use</li> <li>2. It is nationally significant with respect to American history.</li> <li>3. It has significant potential for historical interest based on historic interpretation and appreciation.</li> </ol> With continued support from the broader public, Congress designated the trail a component of the National Trails System in August 1990. In 1996, the National Park Service, the designated federal administrator for the implementation and interpretation of the Anza Trail, completed the Comprehensive Management and Use Plan/Final Environmental Impact Statement (CMP/FEIS) responding to congressional designation of the Juan Bautista de Anza National Historic Trail and the requirements of the National Trail System Act, as amended.

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						<p>Guided by representatives from agencies, counties, municipalities in addition to non-profit partners and the interested public, the CMP/FEIS defines a vision for the Anza Trail, “a traveler will be able to hike, ride horseback, bicycle, and drive on a marked route ... and experiences landscapes similar to those the expedition saw...”. The Anza Trail is associated with the three following components as defined in the CMP/FEIS:</p> <ul style="list-style-type: none"> <li>• Historic Corridor: the historic path travelled by the Expedition</li> <li>• Recreation Retracement Route (recreation trail): a modern, multiuse continuous and commemorative trail implemented by local land managers and non-profits from Nogales, AZ to San Francisco, CA within or near the historic corridor</li> <li>• Auto Route: designated and signed driving route from Nogales, AZ to San Francisco, CA within or near the historic corridor, connecting related historic sites; it allows travel and heightens public awareness while stimulating use of the recreation trail.</li> </ul> <p>The journals of expedition members Lieutenant Colonel Juan Bautista de Anza and Father Pedro Font depict the Expedition’s route closely enough to define a historic trail corridor that guides management and administration of the trail. Management objectives for visitor experience identified in the CMP/FEIS emphasize enjoyment of the Anza Trail and outdoor recreation through</p> <ol style="list-style-type: none"> <li>1. offering experiences of the colonists in settings similar to those of the 1775-76 either on or parallel to the historic route;</li> <li>2. providing highly accurate and engaging interpretation at certified locations; and</li> <li>3. linking historic sites and segments with a recreation trail and an auto route.</li> </ol> <p>The CMP/FEIS includes maps of the historic trail corridor, the auto route, high potential segments, and historic sites. While scholarly research and debate of the exact location still continues, the Anza Trail administrative staff maintains online maps of the historic corridor, planned (from regional and local trail plans) and existing recreation trail segments, and historic campsites at <a href="http://www.mapsportal.org/mapcollab_anza/">http://www.mapsportal.org/mapcollab_anza/</a> and have included a map of the Anza Trail within the DRECP Area.</p> <p>Within the DRECP area, the congressionally-designated historic corridor the crosses the Colorado River into California, then drops down into Mexico (avoiding the large expanse of sand dunes), and then reenters the United States southwest of El Centro. The historic trail corridor continues north through the Yuha Desert, Borrego Valley, Coyote Canyon, Bautista Canyon and into the San Bernardino/Riverside Metropolitan areas. The auto route travels along the southern edge of Imperial County before turning north near El Centro towards Anza-Borrego State Park. Recreation trail segments exist within the BLM Yuma District and the California Desert District as well as through various easements across private lands. While, the historic trail corridor dips into Mexico, the continuous recreation trail is planned to be entirely within the United States through the southern Imperial-Borrego Valley.</p> <p>Given the complexity and pieces that make up management of a National Historic Trail, the DRECP should provide more information on how the trail management corridor was established, and how the historic trail corridor, existing and high potential recreation trail segments, existing auto route, and historic campsites were considered in the development of the trail management corridor. While the management corridor proposed in Alternative 2 supports the trail’s objectives and seemingly protects the trail resources, it is difficult to understand what trail resources were considered when drawing the management corridor. The DRECP should clearly explain what is being</p>

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						used for analysis and how the Plan will impact the CMP/FEIS goals of a continuous recreation trail within or near the historic trail corridor.
183.	II	3	1.3.7.3	2	6	<p>The inclusion of lands with proximity and potential effects on Juan Bautista de Anza National Historic Trail resources within the designation of National Conservation Lands is a proactive way of conserving cultural resources within the historic corridor, including the natural landscape settings required to meet this management goal identified in the CMP/FEIS: “offering experiences of the colonists in settings similar to those of the 1775-76 either on or parallel to the historic route.” This goal complements the BLM guideline to inventory resources such as, “landscape-defining National Trail-related characteristics immediately surrounding and within the viewshed of high potential historic sites and high potential route segments or satellite areas, such as landmarks or landscape features identified by original trail users,” and “opportunities for vicarious experiences,” to conserve and protect landscape elements that are evocative of the period of use to the extent allowed by law. (BLM Manual 6280 - Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation, 2012). The NPS supports the designation of the NLCS corridor as proposed in Alternative Two, with NLCS status extending 10 miles on either side of the trail centerline.</p> <p>Because the Anza expeditions took place early in the Spanish colonization of Alta California, there is an absence of built historic fabric. This absence is offset by the integrity of the trail route’s natural landscape which remains intact in parts of Arizona and in limited parts of California. In most cases, the historic landscape has changed since 1775, either from the effects of natural plant growth and succession, from grazing and farming, from urbanization, or from changing transportation systems. In spite of these changes, landscape features corresponding to the expedition journals can be found along the trail. Generally, these features include mountain peaks and viewsheds, however the larger landscape of desert washes that Father Font noted in his expedition diaries can still be found in Imperial County and provide high value opportunity to experience the landscapes setting of the expedition. <i>“This dry arroyo comes from a range not very far distant, which appears to be a spur of the Sierra Madre, and runs through the plains and sand dunes, which we had on the right, the range being on the left. It has no water, but there is some galleta grass, some of which also is encountered on the way; and it has also some firewood with which to warm us, which was lacking at Santa Rosa. The road is fairly good, having only some ups and downs over some hills on leaving Santa Rosa, ridges of sandy and hard earth, with many black, flat stones that are not very large”</i> (12/12/1775, Expanded Diary of Pedro Font). In many areas of the California desert, this landscape has changed very little since the time of the expedition and its integrity allows visitors the opportunity to vicariously experience that time period.</p> <p>The BLM Recreation and Visitor Service actions that are folded into the DRECP will continue to support the interpretive and recreation goals of the Anza Trail. Particularly, the Trail is completing an inventory of the recreation setting characteristics; planning and managing for sustainable recreation; and maintaining diversity of recreation experiences. These actions support the recreation goals of the NHT and coupled with the conservation goals of NHT inclusion in NLCS lands, the Anza Trail historic corridor will be better protected for experiential opportunities for generations of users. The history of the Anza expeditions and associated historic corridor, including historic sites, represent a vital portion of the Hispanic heritage of America. The historic trail corridor and landscape settings of the trail route provide a direct link to the past.</p>

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						The Comprehensive Management and Use Plan/Final Environmental Impact Statement (CMP/FEIS, NPS, 1996) for the Juan Bautista de Anza National Historic Trail identifies the historic trail corridor using the most current scholarly research and also envisions a continuous, multiuse recreational retracement trail in addition to a continuous auto route from Nogales, Arizona to San Francisco, California within or near the historic trail corridor. The Anza Trail historic corridor dips into Mexico south of the Imperial Valley in California, and because of the nature of the Expedition's path there is no designated management corridor identified in the DRECP through this area. As a result, much of this area has been designated as appropriate for development focus areas and transmission lines. While much of this area today is developed urban area or farmland, the DFA designations and transmission could create a significant obstacle for continuous recreation trail between existing recreation trail in Yuma, Arizona and existing recreation trail in the BLM lands in the southwestern Imperial-Borrego Valley. However, early planning and work with agencies and partners could create a recreation trail within the conceptual east-west transmission line corridor. The CMP/FEIS identifies, a potential linkage segment identified for the recreation trail are the service roads of the All-American Canal. The NPS recommends that the DRECP include an option of developing the recreation trail throughout planning and analysis of DFA and transmission siting along the Anza Trail, include a clear analysis of potential Trail impacts in Chapter Four, and also describe and analyze potential compensatory mitigation for Trail impacts.
184.	II	3	1.3.7.4	2	2	In the western Imperial-Borrego Valley, development focus areas are proposed within two miles of the existing recreation trail and, in places, within five miles of the historic trail corridor. In this area of the historic trail corridor and for these segments of existing recreation trail, the California desert landscape has changed very little since the time of the expedition and its integrity allows visitors the opportunity to vicariously experience a landscape very similar to that of the Anza Expedition. Further protection of the trail corridor's visual resources, beyond the established management corridor identified by the DRECP and including the viewshed of the trail user, is encouraged to preserve the historic landscape settings. The NPS supports the proposed management corridor extending ten miles on either side of the trail centerline in Alternative 2. Please include that management corridor in the agency Preferred Alternative in the FEIS. The NPS also requests the DRECP specify that viewshed analysis should be completed, as part of the National Historic Trail inventory, during the pre-application process for proposed projects to show the visual impacts from the existing recreation trail, and to site projects so natural topographical elements would conceal renewable energy developments where possible.
185.	II	3	2.2.1.2	340	3	The Imperial-Borrego Valley provides high-quality trail experiences of the landscape setting that has changed very little since the time of the Expedition. The Comprehensive Management and Use Plan/Final Environmental Impact Statement (NPS,1996) identifies the desert washes in this area as high potential routes and remaining areas of landscape settings similar to those the Expedition experienced, and its integrity allows visitors the opportunity to vicariously experience that time period. These kinds of landscape setting visual experiences are limited in the overall length of the trail and continued protection of these landscape linkages are encouraged and applauded. Where these critical preserved and intact landscape settings and linkages still exist, they should be elevated for visual resource protection, so that staff can provide interpretive opportunities and recreation trail users can continue to experience the California desert in a similar way to the Anza Expedition. Viewshed analysis of landscape settings should be completed as part of the National Historic Trail inventory during the

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						pre-application process for proposed projects to show the visual impacts from the existing recreation trail, and to site projects so natural topographical elements would conceal renewable energy developments where possible.
186.	II	3	2.2.1.2	340	3	The Comprehensive Management and Use Plan/Final Environmental Impact Statement (NPS, 1996) identifies the desert washes in this area as high potential routes and remaining areas of landscape settings similar to those the Expedition experienced and its integrity allows visitors the opportunity to vicariously experience that time period. Particularly, the desert landscape within the protection of BLM lands in the Imperial-Borrego Valley provides some of the most unaltered landscapes along the recreation trail and historic trail corridor for the entirety of the Anza Trail and is identified in the CMP/FEIS to have high recreation and interpretive value for the Anza Trail. Class II Recognition of the natural landscape's value to trail users and continued preservation of intact landscape setting is encouraged and where appropriate, Class I VRM Recognition should be designated (in such areas as the San Felipe Marsh National Natural Landmark where the Anza historic trail corridor overlaps). However, where DFAs are within the viewshed of the trail management corridor and/or the recreation trail, visual impact analysis should be conducted to assess the impacts that can be seen far beyond the identified management corridor.
187.	II	3	2.2.1.2	340	3	Anza Expedition campsites in this area, in addition to a number of associated historic sites, as identified in the Comprehensive Management and Use Plan/Final Environmental Impact Statement (NPS, 1996) are: <ul style="list-style-type: none"> <li>• Yuma Crossing National Historic Landmark</li> <li>• Mission La Purísima Concepción (California State Register of Historic Places No. 350) located at St. Thomas Indian Mission, Indian Hill on Picacho Rd, Fort Yuma, 1 mi south of Winterhaven</li> <li>• Village of Captain Palma (Campsite 41) near the Yuma Crossing;</li> <li>• Village of Captain Pablo/Pilot Knob (Campsite 42) south of the Yuma Crossing along the Alamo Canal and Highway 186;</li> <li>• Wells of Santa Rosa de las Laxas/Yuha Well (Campsite 47) (California Register of Historic Places No. 1008 Yuha Well) east of Ocotillo and to the south of Interstate 8;</li> <li>• Arroyo Seco (Campsite 48) just to the north of Plaster City;</li> <li>• San Sebastián/San Sebastián Marsh/San Felipe Creek (San Sebastian Marsh National Natural Landmark) (Campsite 49), just southeast of the Highway 78 and Highway 86 junction and the Salton Sea; and,</li> <li>• Los Puertecitos (Campsite 50) in the Ocotillo Wells Vehicular Recreation Area.</li> </ul> <p>All campsites and associated significant historic sites should be included in the document , mapped, and discussed in the Effects and Impact Analysis.</p>
188.	II	3	2.2.2.1	340	5	Please change the text <b>from:</b> “Maintain and enhance the significant qualities of high-potential National Historic Trail (NHT) route segments and sites as defined in the National Trails System Act. Avoid adverse effects (as defined in the National Historic Preservation Act and the BLM/SHPO CA State Protocol) upon intact NHT segments, their settings, and associated sites.”

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						<p><b>to:</b></p> <p>“Maintain and enhance the significant qualities of high-potential National Historic Trail (NHT) route segments and sites as defined in the National Trails System Act. Avoid adverse effects (as defined in the National Historic Preservation Act and the BLM/SHPO CA State Protocol) upon intact NHT segments, their settings, and associated sites and within the historic route corridor where high potential trail segments have been identified though are yet to be built. For lands outside NPS units, local land managers and property owners take the lead in implementing the trail and coordinate interpretation with the Anza Trail staff.”</p>
189.	II	3	2.2.2.1	340	4	<p>Please provide more information on the development of the trail management corridors and consistently map their presence in the proposed alternatives. Given the complexity and pieces that make up management of a National Historic Trail, the DRECP should provide more information on how the trail management corridor was established, and how the historic trail corridor, existing and high potential recreation trail segments, existing auto route, and historic campsites were considered in the development of the trail management corridor. While the Alternative Two 10-mile management corridor supports the trail’s objectives and seemingly protects the trail resources, it is difficult to understand what trail resources were considered when drawing the management corridor. The DRECP should clearly explain what is being used for analysis and should accommodate the trail's goals of a continuous recreation trail within or near the historic trail corridor.</p>
190.						<p>The Anza Recreation Trail within the BLM California Desert District, El Centro Resource Area is routed around San Sebastián Marsh (an Anza Expedition Campsite and designated National Natural Landmark) to protect its natural and cultural resources. As such, the trail management corridor may not include this significant historic, cultural, and natural area because it seems to be based on a single center-line. It is imperative that these sites continue to be preserved for their integrity and where there is overlap, the more restrictive CMAs or land use allocations are applied. The NPS cannot determine from the document how much of the San Sebastian March will be protected, and recommends conservation designations to protect the area.</p>
191.	II	3	2.2.2.1	340	10	<p>The exclusion of cultural landscapes, high potential historic sites, and high potential route segments identified along historic trail corridors from renewable energy rights-of-way will continue to preserve the landscape settings of the California desert that the Anza Expedition members experienced and provide the opportunity to “offer experiences of the colonists in settings similar to those of the 1775-76 either on or parallel to the historic route” (Comprehensive Use and Management Plan and Final Environmental Impact Statement, NPS 1996). Where development affects trail management corridors, management and mitigation actions should include provisions for recreation resources. For example, ensuring that there can be safe recreation use under or near utility corridors supports the dual goals of transmission and a continuous recreation trail. Please work with NPS to structure CMA’s for a dual-transmission/recreation corridor easement along the planned Anza recreational trail. Please also add language that will allow compensatory mitigation dollars for recreational, cultural, and visual impacts to the Trail corridor to be used to develop and/or enhance the recreation trail.</p>
192.	III	8	2	57	4	<p>Remove "de" in front of Anza in document. The convention is to refer to the trail as either the full "Juan Bautista de Anza National Historic</p>

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						Trail" or just "Anza Trail" for short.
193.	III	8	2	58	1	Remove "de" in front of Anza in document. The convention is to refer to the trail as either the full "Juan Bautista de Anza National Historic Trail" or just "Anza Trail" for short.
194.	III	8	2	58	2	Remove "de" in front of Anza in document. The convention is to refer to the trail as either the full "Juan Bautista de Anza National Historic Trail" or just "Anza Trail" for short.
195.	III	8	3	80	4	Remove "de" in front of Anza in document. The convention is to refer to the trail as either the full "Juan Bautista de Anza National Historic Trail" or just "Anza Trail" for short.
196.	III	8	3	81	3	Insert "historic corridor" before "alignment are in the DRECP, in the ...". Remove "de" in front of Anza in document. The convention is to refer to the trail as either the full "Juan Bautista de Anza National Historic Trail" or just "Anza Trail" for short.
197.	III	8	3	82	1	Insert "corridor" after "paralleling the route of the historic trail". Remove "de" in front of Anza in document. The convention is to refer to the trail as either the full "Juan Bautista de Anza National Historic Trail" or just "Anza Trail" for short.
198.	III	18	2	16	2	Insert "historic corridor" before "alignment are in the Plan area, in the...".
199.	III	18	2	16	2	Insert: "There are several existing segments of the Anza Recreation Trail in addition to the signed, continuous auto route within or near the historic trail corridor within the Imperial-Borrego Valley subarea of the plan area." at the end of the paragraph.
200.	III	18	6	27	Map	The "Recreation Lands in the Imperial Borrego Valley Ecoregion" map only shows the Anza Trail Auto Route. Please revise the map to show the centerline of the Anza Trail Management Corridor and existing recreation trail segments.
201.	III	20	2.2.5	27	4	Insert "within the historic trail corridor" after "...cultural and scenic resources." Remove "de" in front of Anza in document. The convention is to refer to the trail as either the full "Juan Bautista de Anza National Historic Trail" or just "Anza Trail" for short.
202.	III	20	2.2.5	27	4	Insert: "Segments of recreation trail exist through the Imperial-Borrego Valley ecoregion subarea near or within the historic trail corridor. There are also four Anza Expedition campsites, including well-known campsites San Sebastian Marsh and Yuha Wells." These sites, in addition to the existing trail segments, have high potential for high-quality interpretive and recreation visitor experiences and the viewsheds from these sites should be protected and considered when studying the impact on the trail's visual resources.
203.	III	20	2.3.2	31	2	Insert "Portions of SR-78 (from approximately Westmoreland to the junction of SR-78 and S3) are designated as the Juan Bautista de Anza National Historic Trail Auto Route (Comprehensive Management and Use Plan/Final Environmental Impact Statement, NPS, 1996)."
204.	III	20	3	33	Table	Include Anza Expedition campsites (6) and the auto route in calculations of visual resources.
205.	IV	8	3.2.1.1	37	4	Please include more information about how NHT centerlines are determined and established. Given the complexity and pieces that make up management of a National Historic Trail, the DRECP should provide more information on how the trail management corridor was established, and how the historic trail corridor, existing and high potential recreation trail segments, existing auto route, and historic campsites were considered in the development of the trail management corridor. The Alternative 2 management corridor extending 10 miles on each side of the centerline supports the trail's objectives and seemingly protects the trail resources, but it is difficult to understand what trail resources (historic corridor, recreation trail, and/or auto route) were considered when drawing the management

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						corridor. The DRECP should clearly explain what is being used for analysis and address how to accommodate the trail's management objective of a continuous recreation trail within or near the historic trail corridor.
206.	IV	20	3.2.1.1	46	2	Please recalculate so percentage is miles of trail corridor protected via the Reserve Design within total miles of Anza Trail Historic Corridor within the DRECP project area, not overall trail corridor. At this time it is difficult to understand if the percentage refers to the trail within the DRECP project area (approximately 83 miles total, 4% = 3.32 mi and 43% = 35.7 mi) or the overall trail (1200 miles total, 4% = 51.32 and 43% = 1067.7 mi). Furthermore, the difference between miles of conservation between No Action (43%) and the Preferred Action (4%) should be clearly explained.
207.	App G			16		Conceptual transmission plan shows alignment along a railroad corridor (from Plaster City north towards the US Naval Reserve). This is the same corridor as the Anza Trail Historic Corridor and segments of existing Anza Recreation Trail. Visual impacts to the trail could be significant in relatively undisturbed California desert. If the transmission corridor is used, management and mitigation actions should include provisions for recreation resources. For example, ensuring that there can be safe recreation use under or near utility corridors supports the dual goals of transmission and a continuous recreation trail. Please work with NPS to structure CMA's for a dual-transmission/recreation corridor easement along the planned Anza recreational trail. Please also add language that will allow compensatory mitigation dollars for recreational, cultural, and visual impacts to the Trail corridor to be used to develop and/or enhance the recreation trail.
208.	II	2				In the DRECP Imperial-Borrego Valley sub-area, the recreation trail through the BLM lands intentionally deviates from the historic corridor in order to preserve and protect the outstanding natural landscapes - including the San Sebastian Marsh, an Anza Expedition campsite and National Natural Landmark - that still exist in similarity to the landscape settings that Expedition members experienced (CMP/FEIS 1996). This deviation, however, does not detract from the mission to continue to protect the historic corridor while supporting our trail partners (BLM El Centro) in providing high quality recreational and interpretive experiences while on the recreation trail. We urge the DRECP project team to reconsider the DFA planned for the area directly to the southwest of the Salton Sea, northwest and across the highway from San Sebastian Marsh NNL, San Felipe Creek and associated wash, and the Anza Trail historic corridor. In addition to its close proximity to these natural landmarks and nationally significant historical and cultural corridors, the local planning efforts via Imperial County Renewable Energy and Transmission Element Update PEIR maps (2014) show the intention for these lands to remain as agricultural land use. NPS strongly recommends that the DRECP be consistent with the Imperial County local planning in this specific area.
209.	III	3	3.8	82		The NPS is unable to locate maps in the DEIS that demonstrate a centerline which will be used for the Old Spanish National Historic Trail and related management corridor. Please provide mapping of the centerline(s).
210.	IV	4	4.8	37	2 <sup>nd</sup> bullet	This bullet directs the reader to "see also maps", but there is no indicate of which Figures the reader should examine. This bullet is also confusing, because different widths of Management Corridor are proposed in the different alternatives, but this CMA refers only to the five-mile width. The inclusion of "generally" is also unclear – please specify where exceptions will be made from the five-mile (or 10-mile, as the NPS recommends) management corridor width.
211.	IV	4	4.8	38	Last bullet	The NPS is unable to determine visual resource impacts to the trail from this general description. Please specify or refer to a single

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						location where the reader can find the “state of the art VRM BMP’s” that will be used to protect trail settings.
212.	IV	4	4.8	39	First bullet	This bullet discusses compensatory mitigation and acquisition or restoration of trail features and landscapes, and the concept of net benefit to the overall trail corridor. The NPS administers the National Historic Trails, and should be specifically named as an arbiter of what constitutes appropriate trail relocation, on-site or off-site mitigation, and “net benefit” to the trail corridor for National Historic Trails.
213.	IV	4	4.8			Although the document mentions that the DRECP will make decisions for the Juan Bautista de Anza NHT and the Old Spanish NHT, there is no discussion of impacts to the trails under the different alternatives, or of general impacts to the trails. Please include discussion of impacts to trails from the different proposed alternatives, which would include beneficial impacts to the trails from designation of the National Historic Trail corridor, and would include likely adverse impacts from designation and construction of Development Focus Areas.
214.	III	III	20.2.3	III.20-28		<p>Anza-Borrego Desert State Park was designated a National Natural Landmark (NNL) in 1974. The landmark, representing some of the best examples of the desert biotic communities of the Colorado Desert, include mountain ranges, canyons, valleys, desert washes, badlands topography, and flowing streams. Many of the more remote canyons contain waterfalls, outstanding rock formations and palm oases containing the fan palm (<i>Washingtonia filifera</i>). Anza-Borrego Desert State Park, like all the other NNLs (see attached list) within the extent of the DRECP, have been recognized for being some of the best remaining examples of America’s natural heritage. Once designated a NNL, an area is listed on the National Registry of Natural Landmarks. The National Natural Landmarks Program does not place any land use restrictions on properties, as a direct result of federal designation. The NNL Program recognizes and encourages the voluntary, long-term commitment of public and private owners to protect an area’s outstanding values. The NPS encourages the REAT agencies to provide maximum protection to this National Natural Landmark, following specific recommendations made by California State Parks and Recreation, the landowner.</p> <p>In the case of federal ownership, agencies are expected to consider the unique properties of natural landmarks in assessing the effects of their actions on the environment as required by the National Environmental Policy Act (NEPA). If, however, the resources for which the site was designated are irreparably damaged, lost or destroyed, the Secretary of the Department of the Interior can remove the NNL designation.</p> <p>NNLs within the extent of the DRECP include:</p> <ul style="list-style-type: none"> <li>• Amboy Crater (BLM)</li> <li>• Anza-Borrego Desert State Park (State, Municipal, Private)</li> <li>• Cinder Cone Natural Area (NPS)</li> <li>• Imperial Sand Hills (BLM, Private)</li> <li>• Mitchell Caverns and Winding Stair Cave (State, NPS)</li> <li>• Rainbow Basin (BLM)</li> <li>• San Felipe Creek (BLM, State, Municipal)</li> </ul>

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						<ul style="list-style-type: none"> <li>• Trona Pinnacles (BLM)</li> <li>• Turtle Mountains Natural Area (BLM)</li> </ul> <p>Eureka Dunes NNL may fall within the DRECP, but NPS cannot determine from this document. If so, it should be added to the above list. Vol. III, Section III.10-5 identifies Eureka Dunes as being "...in or near the Plan Area...". Please clarify whether the NNL is in the Plan area. Please also analyze describe the affected resource and likely impacts for each NNL in the document.</p>
215.	III	III	III.10	III.10-5		<p>The document states and NPS agrees that: "Federal agencies and their agents should consider the existence and location of designated National Natural Landmarks, and of areas found to meet the criteria for national significance, in assessing the effects of their activities on the environment under Section 102(2)(c) of the National Environmental Policy Act (42 U.S.C. 4321)."</p> <p>The text indicates that the DRECP EIS should assess the effects of proposed conservation and development actions upon the biological, visual, geological, paleontological, recreation, and other resources of NNL's affected by the Plan. Although a couple of NNL's are mentioned in Chapter Three, the NPS is unable to find impact assessments in Chapter Four or elsewhere the DEIS for NNL's. The NPS recommends that the FEIS include these analyses in Chapter Four, as well as similar analyses for other NPS-owned or NPS-managed lands and resources (e.g., National Historic Trails and National Historic Landmarks) affected by the Plan.</p>
216.	IV	IV	IV.10			<p>The document states and NPS agrees that: "Federal agencies and their agents should consider the existence and location of designated National Natural Landmarks, and of areas found to meet the criteria for national significance, in assessing the effects of their activities on the environment under Section 102(2)(c) of the National Environmental Policy Act (42 U.S.C. 4321)."</p> <p>The text indicates that the DRECP EIS should assess the effects of proposed conservation and development actions upon the biological, visual, geological, paleontological, recreation, and other resources of NNL's affected by the Plan. Although a couple of NNL's are mentioned in Chapter Three, the NPS is unable to find impact assessments in Chapter Four or elsewhere the DEIS for NNL's. The NPS recommends that the FEIS include these analyses in Chapter Four, as well as similar analyses for other NPS-owned or NPS-managed lands and resources (e.g., National Historic Trails and National Historic Landmarks) affected by the Plan.</p>
217.	App L North Algodones Dunes NNL					<p>The NPS is not aware of a "North Algodones Dunes NNL". This site/name does not exist within our National Registry of Natural Landmarks.</p>
218.	App L Turtle Mountain NNL					<p>The NPS supports further protection for the Turtle Mountain NNL through ACEC designation and continued management for resource protection.</p>
219.	App L Trona Pinnacles NNL					<p>The NPS supports further protection for the Trona Pinnacles NNL through ACEC designation and continued management for resource protection.</p>
220.	Appendix Q Baseline Biology			5-38		<p>As stewards of protected lands, the National Park Service protects wildlife species through a variety of internal programs, and also serves as an active conservation partner with the U.S. Fish and Wildlife Service and other federal and non-federal agencies and organizations that</p>

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	Report					<p>act toward the conservation of species and their habitats on the larger landscape. NPS lands currently harbor spatially important refugia that encourage resiliency, and many species transit NPS lands during migration or everyday activity, and external developments and processes can thus threaten park resources. Renewable energy developments near NPS lands or located in migratory fly-ways are of particular interest to NPS, and pursuance of rigorous science and informed planning is critical to conservation of the resources we are mandated to preserve through the Organic Act of 1916. The NPS is actively involved in California condor recovery, and offers comments relevant to condor protection in the DRECP.</p> <p>Considering condor’s historical range across the western US, future range expansion is expected to include large areas of the DRECP. Because the Plan extends through 2040, the NPS recommends that the Plan use a range more accurately reflecting condor range over time, rather than a range established from a limited set of GPS data over the past two years. A more accurate range could be produced at the beginning of the Plan by examining the ongoing trend of range expansion and including long range movements of condors, or the range could be altered through the Monitoring and Adaptive Management Program as the range is observed to increase. If the range will be altered through the MAMP, the NPS recommends annual reassessment of the documented range using the extensive GPS transmitter record. Reassessment should be coordinated with the Condor Recovery Working Group.</p> <p>The document states: “The wild population includes 123 in central and Southern California, of which approximately 56 (not including 6 young still in the nest) currently inhabit Southern California and have the potential to visit portions of the Plan Area.”</p> <p>The above statement does not account for increased range expansion and implies the birds currently using central CA will not be impacted by DRECP activities that will impact the birds currently in southern CA. Condors from the central California population already fly into the southern California area used by condors there, and this behavior is expected to continue. The NPS recommends that the Plan use this documented movement pattern to reassess and adjust the number of condor, which are considered to have the potential to visit the Plan Area. For instance, see Figure 4 for a recent 3-week flight track in which a condor ranged from Livermore, CA to the vicinity of the Plan Area well south of Bakersfield.</p> <p>The Baseline Biology Report discusses historical sightings of condor in the Plan Area:</p> <p>“Historical sightings in the Plan Area were primarily in the northwestern portion of the Plan Area in the area around Tehachapi. Some historical sightings were east of the Piute Mountains, south and east of Bright Star and along the western edge of Red Rock Canyon. Farther south, there is a historical occurrence along the southwestern boundary of the Plan Area northeast of Acton and one southwest of Lancaster (Figure SP-B06).” Baseline Biology Report Page 5-40</p>

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						<p>However, the Baseline Biology Report also describes just how limited the population’s range had become by the time some ‘historical sightings’ would have been documented:</p> <p>“British Columbia, Canada, to Baja California, Mexico, with small inland populations in regions such as the Grand Canyon (Snyder and Snyder 2000, D’Elia and Haig 2013). Condors were in the Pacific Northwest until the beginning of the 20th century and found in the southern segment (Baja California) until the 1930s (Koford 1953; Wilbur 1973). By the middle of the 20th century, condors were confined to a small region in Southern California.” Baseline Biology Report 5-38</p> <p>Therefore, we can expect that historical sightings (in the 2nd statement) were limited to observations of an already reduced population range and are not indicative of the more expansive historical range. Based on their historical range from BC to Baja, we should expect that condors would use more of the DRECP Plan area in the future with population recovery and range expansion.</p> <p><b>Condor species distribution jpg:</b> most important is their disclaimer <i>“these dates should be used only [to] illustrate where condors are known to have visited, and not to illustrate where condors do not exist.”</i></p>
221.	Appendix H			H-82		<p>“The latest version of the Condor Recovery Plan (USFWS 1996) suggests that habitat loss is not an important factor in the recovery of the condor. Similarly, Snyder (2007) did not identify habitat loss as a limiting factor for wild California condors.” ... “However, as the wild condor population increases and expands its current foraging range, and potentially nesting site distribution, secure foraging habitat availability and safe food sources could become limiting factors for recovery of the species. Providing foraging habitat for the condor is one of the recovery objectives for the species (USFWS 1996).” Page 5-39 Baseline Biology Report.</p> <p>Access to ‘safe food sources’ is the critical part of foraging habitat: meaning education and outreach – not land acquisition. Land acquisition alone will not provide good habitat to condors. What are needed are land management and use practices that specifically provide clean food resources to condors. This can best be accomplished by conducting an extensive and long-term campaign on the dangers of lead ammunition to all wildlife scavengers, particularly condors within their current and future range. The NPS, as a longtime central partner in the Condor Recovery Program, recommends 50% of funds should directly fund a campaign on safe ammunition; 25% of funds should support condor recovery efforts and GPS transmitters on all CA condors for the next 10 years that would precisely demonstrate occurrence of condors within the DRECP; and 25% should support land acquisition.</p>
222.	Appendix H					<p><b>Condor habitat intactness jpg:</b> The analysis included BLM grazing allotments as part of the fragmented habitat indicator (contributing to poor habitat). Please explain this assumption, since cattle are noted as a primary food source in the Baseline Biology report and we know grazing lands provide good habitat to condors.</p>
223.	Appendix H					<p><b>Cumulative impacts on condor:</b> This section only considers the current known use of area. The cumulative effects analysis should also consider how reasonably foreseeable activities added to the area between 2015 and 2040 may impede recovery in the future.</p>
224.	III	3	3.07			<p><i>“At this time, nesting has not been documented in the Plan Area; condor use of the Plan Area is currently limited to foraging and roosting.”</i></p> <p>However, condors may be impacted during foraging and roosting, not just nesting and breeding.</p>

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						<p><i>"...The remaining wild population includes 30 birds in Baja California and 70 in Arizona. Due to a combination of captive breeding and release, and wild nest reproduction, this population is steadily increasing and is expected to continue to increase, barring stochastic catastrophes."</i></p> <p>This statement ignores extensive management efforts that allow for increases in number. At the same time, with increasing population we would expect expanded range, therefore greater overlap with the Plan Area.</p>
225.	IIII	4	4.07	7-961		<p>Please clarify: Who will develop the Condor Operations Strategy? What will be the review process, and how will the Condor Recovery Working Group be involved? What measures will be taken to encourage consistency among COS's for different projects? What measures will be taken to compare the success of different COS approaches and adapt existing COS's or inform new COS's?</p>
226.	IIII	4	4.07	7-961		<p><i>"No take for condors will be permitted in the form of kill from project operations. Any actions taken to encourage condors to leave an area that might result in harassment, injury, or mortality to the bird will be conducted by a Designated Biologist."</i></p> <p>These sentences are confusing. If no take will be permitted in the form of kill, will there be take permitted in the form of harassment to be conducted by a Designated Biologist? If so, this should be included in the impact analysis. As written, we do not see such take described in the document. The USFW memo from the Hopper Mountain National Wildlife Refuge Complex dated September 3, 2014, Subject "Recovery Program Guidance on Hazing California Condors" may be usefully incorporated here to further refine guidance on hazing.</p>
227.	IIII	4	4.07	7-962		<p><i>"Development in the West Mojave and Eastern Slopes subareas would occur in the Tehachapi Mountains and areas to the north of Edwards AFB, as well as agricultural land around Lancaster and in the Antelope Valley. In these areas, susceptible species would include pallid bat, Townsend's big-eared bat, tricolored blackbird, golden eagle, mountain plover, Bendire's thrasher, burrowing owls and Swainson's hawk,"</i> .</p> <p>Please consider adding California condor to this list, or explaining why they are not included</p>
228.	IIII	4	4.07	7-963		<p><i>"Both large transmission lines and the network of smaller gen-tie lines would present collision and electrocution hazard to covered bird species. In particular, lines running perpendicular to migratory corridors, and/or close to bird refuges would represent a greater hazard. Such lines would include those anticipated to run parallel to the Tehachapi Mountains and those that would cross the Tehachapi mountain passes."</i></p> <p>These lines could present a significant risk to condors. Power lines caused mortality of three condors in the Anderson Peak area, resulting in eventual burial of the lines. Please analyze risk to condors from these lines, and include a Conservation and Management Action that lines will be buried if repeated condor mortality occurs in a specific area, or if an area is determined to be at high risk for condor mortality</p>
229.	II	2	2.3	67		<p><i>"Covered Activities with the potential to take condors should consult with the DRECP Coordination Group to evaluate a project's risk to condors given the project location, technology, and current status of the condor population. Covered Activities that are determined to have a potential risk of taking condors will implement the best detect, deter, and curtailment strategy available at the time of construction to assure no take of condors. The strategy must be approved by the DRECP Coordination Group."</i></p> <p>Please analyze the risk of taking condors in this programmatic document, in addition to the later project-by-project analysis. Risk of take is analyzed for other Covered Species, and should be performed for condors as well. The Condor Recovery Working Group is an interagency</p>

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						group with many years of experience planning and implementing condor conservation and recovery. Conservation and Management Actions and Condor Operation Strategies should be subject to review and approval by this expert interagency group.
230.	II	2	2.3	68	2nd	This Conservation and Management Action discusses installing barriers of welded wire fabric or hardware cloth around “any facility element that poses a danger to condors.” The facility elements most likely to pose a danger to condors are transmission lines and wind turbines, and barriers to limit access on this scale seem impractical. Please clarify which facility elements are considered hazards to condor and what benefits are likely to be conveyed and further risks to condor or other birds incurred by barrier installation.
231.	IIII	4	4.07			The USFW has been working recently to increase consistency among Bird and Bat Conservation Strategies across different renewable energy projects. To set the stage for consistency among Condor Operations Strategies, the NPS suggests that an initial set of specific condor Conservation Management Actions derived from recently permitted wind projects be included in the DRECP. These CMAs should not be considered limiting, but rather as a minimum standard and beginning framework.
232.	IIII	4	4.07			The NPS suggests that a condor action plan equivalent in level of detail to the eagle action plan be a part of the Final EIS. Extensive movement and mortality tracking of individual condors has been ongoing for many years, and can be incorporated into a sophisticated risk analysis and action plan.
233.	IIII	4	4.07			A better explanation is needed on the complex topic of what is covered by the DRECP in space and in time. It is NPS understanding that if condors are killed by wind projects within the DRECP Plan Area that were permitted and built before the DRECP process began, those condors are not considered “at risk” from the DRECP. However, the condors are in the population covered by the DRECP, so the risk and the take needs to be considered as part of the DRECP cumulative effects analysis and also as part of the cumulative effects analysis in each project to be permitted under the DRECP. It is not clear from the document how impact analyses for future projects will tier from the DRECP and will also reflect the risks from pre-DRECP projects in the DRECP Plan Area; please clarify.
234.	IV	4	4.8			Historic districts and cultural landscapes cross-cut/encompass lands under multiple jurisdictions. The current boundaries we draw on the ground today have little bearing on past landscapes. Archeological sites, historic sites, Traditional Cultural Properties (TCPs), and cultural resources on the district and landscape scale often include individual elements that lie on adjacent lands with different jurisdictions and conservation efforts need to consider this reality in efforts to document and assess effects to these resources. NPS recommends the DRECP documents provide guidance for the significance evaluation of cultural resources that utilizes a holistic approach to considering relationships between and among groups of resources and their cultural setting. It is particularly of concern that archeological sites not be viewed as discrete and distinct elements but as potential parts of historic districts, archaeological districts, and/or as contributing elements to TCPs and cultural landscapes. Only after such an analysis should a site be determined to be a stand-alone element with no documentable relationship to other sites or setting components.
235.	IV	4	4.8	23		The NPS recommends a stated commitment to avoidance as the first line and highest priority for protection of cultural resources in this section, with minimization and compensatory mitigation measures clearly stated to be used only for unavoidable impacts.
236.	IV	4	4.8	23		The NPS recommends further clarity for this description. The document refers to project-specific Section 106 Programmatic Agreements (PA) and to the Solar Programmatic Agreement negotiated during completion of the Solar Programmatic EIS, but does not clearly identify

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						the relationship of the DRECP Section 106 PA to these other PA's. Please clearly identify the hierarchy, relationship, and/or separate jurisdictions or topic areas among the three types of PA's that will provide protection of cultural resources in the Plan Area.
237.	IV	4	4.8	24	First	For the BMP's recommended in USDO I (2013) and for the other mitigations listed in this section, please clarify whether the measures are mandatory or merely suggested. Understanding the certainty of use of these protections is necessary for the NPS and other stakeholders to comment on the level of protection and related impacts.
238.	IV	4	4.11	15	First bullet	Please clarify which planning and guidance documents of the National Park Service are expected to be applied through the DRECP to "reduce potential impacts". The NPS agrees that its planning and guidance documents should be used to reduce impacts, however, the only firm requirement for protection of NPS resources in the DRECP is a commitment to protection of Devil's Hole hydrologic impacts that is required by Nevada legislation, rather than a guidance of the NPS. NPS staff are available to work with permitting agency staff or consultants on the DRECP FEIS to identify NPS documents which could be implemented as protective measures in the DRECP to reduce potential impacts.
239.	III	III.20	111.20.1	111.20-1		Daytime and night time scenic views are also protected as Air Quality Related Values (AQRV) under the Clean Air Act. (42 USC 7401-7671q). Title 42, Ch. 85, Subchapter I, Part C, Subpart i "The Federal Land Manager and the Federal official charged with direct responsibility for management of such lands shall have an affirmative responsibility to protect the air quality related values (including visibility) of any such lands within a class I area and to consider, in consultation with the Administrator, whether a proposed major emitting facility will have an adverse impact on such values."
240.	III	III	New Section recommended			Please describe the current status of lighting or lack of lighting in these rural and remote areas so that potential impacts upon night skies can be analyzed in Chapter Four, and be understood for public review and comment. The nighttime environment can be important as a natural resource, a cultural resource, or both. Naturally dark night skies are a resource with inherent value that may have a profound effect on the quality of many other resources such as wildlife, wilderness, recreation, astronomy, cultural resources, historic resources, and overall ecosystem function. In addition, night skies have been identified as an Air Quality Related Value under the 1977 Clean Air Act Amendments. For these reasons, NPS recommends that the DRECP address potential impacts to all of these resources from artificial lighting, addressing night skies as an independent impact topic in the document. While there are several scattered mentions of night lighting through the document, it is currently difficult for the NPS to determine what lighting measures will be specifically required and what the impacts will be from anticipated night lighting. Bringing night lighting into a single topic area will help decision-makers, reviewers, and project proponents understand and implement consistently minimal night lighting.  One way to measure the quality of the lightscape is to measure total sky brightness averaged across the entire sky and then compare that value to natural nighttime light levels. This measure, called the Anthropogenic Light Ratio (ALR), can be directly measured or modeled when observational data is unavailable. Lower ALR levels reflect higher quality night sky conditions. Figure 5 is an image of modeled ALR for the southern California region. The areas in blue and purple are close to pristine natural conditions. These are places where the Milky

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						<p>Way and most constellations can still be seen. Artificial light may be visible and may impact the darkness of the sky, but it does not yet dominate the natural celestial light. At these levels of skyglow, some discoloration of the sky is present, but only some distant light may be seen. Dark adaptation of eyesight may be possible in most directions. Installation of large-scale and bright lighting in these areas will likely negatively impact the conditions.</p> <p>In addition to this predicted skyglow, NPS has extensively measured night sky conditions in the Plan Area. Some examples of sky brightness imagery collected by the NPS Natural Sounds and Night Skies Division can be seen in Figures 6-8. The NPS is available to assist DRECP planners and consultants in selecting an appropriate modeling and analysis.</p>
241.	IV	IV	New Section recommended			<p>The nighttime environment can be important as a natural resource, a cultural resource, or both. Naturally dark night skies are a resource with inherent value that may have a profound effect on the quality of many other resources such as wildlife, wilderness, recreation, astronomy, cultural resources, historic resources, and overall ecosystem function. In addition, night skies have been identified as an Air Quality Related Value under the 1977 Clean Air Act Amendments. For these reasons, the NPS Natural Sounds and Night Skies Division (NSNSD) recommends that the DRECP address potential impacts to all of these resources from artificial lighting. One approach for addressing this issue is to assess Night Skies as an independent impact topic in environmental documents. While there are several scattered mentions of night lighting through the document, it is currently difficult for the NPS to determine what lighting measures will be specifically required and what the impacts will be from anticipated night lighting. Bringing night lighting into a single topic area will help decision-makers, reviewers, and project proponents understand and implement consistently minimal night lighting. Facility and construction lighting should be described, in addition to avian obstruction lighting. Among the topics to specifically address are the various types of light pollution (glare, sky glow) and the ways they affect the environment (scotopic vision, wildlife behavior, view of night sky, scientific discovery).</p>
242.	III	III	21			<p>While this section includes laws and regulations addressing noise and information pertaining to noise, the NPS recommends that the section better describe and quantify the existing soundscape as a resource. The NPS is available to assist DRECP planners and consultants in selecting an appropriate modeling and analysis. The acoustic environment is a resource with intrinsic value. It is important as a natural resource, a cultural resource, or both. It is a critical component of wilderness character and plays an important role in wildlife communication, behavior, and other ecological processes. Results from multiple surveys indicate that hearing the sounds of nature is an important reason for visiting national parks. Therefore, the value of acoustic environments and soundscapes is related to an array of park and Plan Area resources and has broad implications.</p> <p>Sound levels in national parks and throughout the Plan Area can vary greatly, depending on location, topography, vegetation, biological activity, weather conditions and other factors. For example, the din of a typical suburban area fluctuates between 50 and 60 decibels (dBA), while morning sound levels at Mojave National Preserve have been measured at 20 decibels.</p>

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						<p>The NPS Night Sounds and Natural Skies Division (NSNSD) has conducted acoustical monitoring in several parts of this region. Reports are available for Mojave National Preserve and Death Valley National Park, and can be provided to the REAT agencies or EIS consultants on request. Figures 9 and 10 graphically illustrate some of the results of the studies. In general, sound levels are elevated near human installations such as roadways and towns.</p> <p>In the absence of acoustical measurements, NSNSD uses a geospatial model to predict existing sound levels, natural sound levels, and impacts to the natural sound baseline. Sound pressure levels for the continental United States were predicted using actual acoustical measurements combined with a multitude of explanatory variables such as location, climate, landcover, hydrology, wind speed, and proximity to noise sources (roads, railroads, and airports). The model predicts daytime sound levels during midsummer. Figures 10-13 are images of predicted existing conditions based on the model. Darker colors show quieter conditions.</p>
243.	IV	IV	IV.21			<p>The NPS recommends that noise impact be analyzed for the nationally and internationally significant National Park Service units in the Plan Area, in addition to analysis by county. Noise impact analysis should include likely noise impact from Development Focus Areas (such as the proposed DFA on the northwest boundary of Joshua Tree National Park), from Future Assessment Areas, from Special Analysis Areas, from proposed variance lands in Alternative Four, and from potential transmission construction. Community noise equivalent level (CNEL) and average day/night levels (DNL) noise metrics are often used in environmental documents to assess the soundscape; but these are primarily useful to assess noise impacts on humans. These metrics are inappropriate where quiet and solitude are expected and where overall ambient sounds levels are low. NPS encourages the use of the noise metrics listed below which would allow for a better understanding of the noise impacts of the proposed action to park and Plan Area resources:</p> <ul style="list-style-type: none"> <li>○ Lmax: Maximum dBA in a given period</li> <li>○ Percent Time Audible</li> <li>○ Time above natural ambient + 3 dBA</li> <li>○ Time above natural ambient + 10 dBA</li> <li>○ Time above 52 dBA</li> <li>○ Time above 60 dBA</li> </ul> <p>In the absence of acoustical measurements, NPS uses a geospatial model to predict existing sound levels, natural sound levels, and impacts to the natural sound baseline. Sound pressure levels for the continental United States were predicted using actual acoustical measurements combined with a multitude of explanatory variables such as location, climate, landcover, hydrology, wind speed, and proximity to noise sources (roads, railroads, and airports). The model predicts daytime sound levels during midsummer. Figures 10-13</p>

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						<p>show predicted existing conditions based on the model. Darker colors show quieter conditions. The NPS is available to assist DRECP planners and consultants in selecting an appropriate modeling and analysis.</p> <p>The DRECP process should also consider the cumulative impacts of the reasonably foreseeable future actions that will tier off the DRECP. Energy projects plans should include noise-generating activities in terms of location, magnitude, extent, and timing of operations, by providing information such as location maps, areas of disturbance, roadways and transportation routes, equipment types, and scheduling and duration of events.</p>
244.	II	II	II.3.1.3.7.4			<p>The document states that “The DRECP EIR/EIS identifies a comprehensive suite of required CMAs developed to avoid, minimize, and/or mitigate adverse impacts on visual resources, see Section II.3.2.3.10.” However, Section II.3.2.3.10 contains only vegetative protective measures. Section II.3.2.3.12.2 contains a reference to latest BMP’s from “Solar, Wind, West Wide Energy Corridor, and Geothermal PEISs, the Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands and other programmatic BMP documents”. The NPS is unable to identify which visual resource protections will apply from these several identified and unidentified documents. Please assemble the suite of required CMA’s in one document for reviewers, decision-makers, and proponents to understand and implement visual resource protections. If the suite of required CMA’s is compiled elsewhere in the document, please include the specific location here.</p>
245.	II	II	II.3.2.3.12.2	419		<p>Within the suite of assembled CMA’s, please include CMA’s specifically to protect the night sky as a unique desert resource. The NPS is available to consult on specific CMA’s, and generally recommends that the design, selection, and operation of outdoor lighting for projects in construction, operation, and decommissioning incorporate the following approaches to minimize impacts to park resources:</p> <ul style="list-style-type: none"> <li>• Light only where it is needed</li> <li>• Light only when it is needed</li> <li>• Shield lights and direct them downward</li> <li>• Use the minimum amount of light necessary</li> <li>• Select lamps with warmer colors (less blue light)</li> <li>• Select the most energy efficient lamps and fixture</li> </ul>
246.	III	III		1		<p>The air quality section only addresses mobile and stationary air pollution sources. Please also address “area” sources such as windblown dust from dry lakes, wildland fire, and large utility scale renewable energy developments.</p> <p>Part of the Plan area is in non-attainment for PM<sub>10</sub>, the main component of windblown dust. General conformity (Clean Air Act) applies, which states new development must not cause or contribute to air pollution exceedances in non-attainment areas. Please address how Covered Activities will achieve general conformity.</p>
247.	IV	IV	2.1.3	6		<p>The NPS recommends including a table in this section quantifying operational emissions. Operational emissions are discussed in the impacts and mitigation sections, but the actual operational air pollution emissions are not quantified. To judge the effectiveness of</p>

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						mitigation measures, to apply the Monitoring and Adaptive Management Program, and to analyze cumulative effects, emissions will need to be quantified.
248.	IV	IV	3.1.1.1.	6		Construction emissions are the only ones reported. Please include operational air pollution emissions.
249.	Appendix R		1.2			Construction emissions are the only ones reported. Please include operational air pollution emissions.
250.	IV	IV				The NPS is unable to find impact discussion in Chapter Four for the varying configurations of Areas of Critical Environmental Concern (ACEC) proposed in Appendix L. For instance, there are several proposed configurations for the Old Woman Springs ACEC, conferring different degrees of connectivity onto this vital wildlife linkage. While Chapter Four contains tables of acreage affected across an ecoregional subarea by different alternatives, it would be helpful to see effects of conservation designation for individual ACEC's or National Conservation Lands. Please include impacts discussion of the proposed alternatives for individual ACEC's or NLCS, which may vary by tens of thousands or hundreds of thousands of acres and differ widely in connectivity by alternative. Please also address the benefits that would be conveyed by designation as National Conservation Lands compared to designation as ACEC.
251.	III	III	3.18			<p>The 1,210-mile Juan Bautista de Anza National Historic Trail (Anza Trail) commemorates, protects, marks, and interprets the route traveled by Anza during the years 1775 and 1776 from Sonora, Mexico (New Spain), to bring settlers to establish a mission and presidio at today's San Francisco, California. It is a mission of the National Park Service to promote the preservation of, public access to, and enjoyment and appreciation of historic and cultural resources and associated outdoor areas related to the Anza Expedition, its descendants, and the American Indians who allowed them passage.</p> <p>NPS is the designated federal administrator for the implementation and interpretation of the Anza Trail, and we coordinate with local partners and other federal and state agencies to develop the recreation trail and associated interpretive programs and materials. We are pleased that the planning agencies for the DRECP have undertaken the process of protecting the Anza Trail and management corridor through the DRECP project area. We truly appreciate the dedication to this effort in light of the many other priorities.</p> <p>As described in the National Trails System Act, as amended, and re-iterated in the National Park Service Director's Order 45, National Historic Trails are, "extended trails, established by Congress, that follow as closely as possible the original routes of nationally significant historic and pre-historic travel routes. The purpose of these trails is the identification and protection of the historic route and its artifacts for public use and enjoyment. The Anza Trail Comprehensive Management and Use Plan / Final Environmental Impact Statement (CMP/FEIS) (NPS, 1996) calls for the creation of a continuous "Recreational Retracement Route" (recreation trail) from Nogales, Arizona to San Francisco, California. The plan identifies potential recreation trail alignment for some segments of the route, including segments through the DRECP planning area. Ideally, the recreation trail would follow the historic corridor traveled by the Anza Expedition, but in many areas that goal is impractical or infeasible, so alternative, parallel alignments are necessary to utilize existing recreation trail or offer an improved recreational experience.</p>
252.	II	II	2.3	26		The NPS would like to make certain that the interagency cooperation of the BLM Solar Programmatic Environmental Impact Statement is

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						<p>carried forward into the DRECP in specific language. The following language is adapted from pages 2-51 to 2-52 of Volume I of the Final Solar PEIS, dated July 2012. Please incorporate into the DRECP where appropriate, possibly as a Plan-wide Conservation and Management Action, to maintain consistency with the Solar PEIS, and to guide development to the lowest impact areas for National Park Service resources.</p> <p>“The construction and operation of utility-scale renewable energy projects and related transmission infrastructure near units of the National Park System and other special areas administered by the NPS, including National Historic Trails, may significantly affect park programs, resources, and values. For example, ecological resources (such as habitat and migration of species) and physical resources (such as wind, water, air, and scenic views) cross park boundaries, and park boundaries often do not represent all of the natural resources, cultural sites, and scenic vistas that make up resources and the quality of the park visitor’s experience in these special places.</p> <p>The NPS has identified areas within the proposed Development Focus Areas and other areas that may be open to development where utility scale renewable energy development and related transmission infrastructure poses a high potential for conflict with the natural, cultural, and/or visual resources administered by the NPS.</p> <p>Maps and data documenting areas of high-potential conflict with National Parks, historic trails, and other areas under NPS administration are available on the Solar PEIS project Web site (<a href="http://solareis.anl.gov/involve/cooperating/index.cfm">http://solareis.anl.gov/involve/cooperating/index.cfm</a>) and will be made available through the DRECP website to renewable energy developers who express interest in siting a project. This information will promote public awareness and notify industry where additional documentation may be required to proceed with an application. The maps and data are not exhaustive, and should be regarded as a first-order approximation of landscape-scale conditions and potential resource conflict and will be updated as new information and analytical tools are developed.</p> <p>These maps and data will be used in the siting of proposed renewable energy projects and related transmission infrastructure in the Development Focus Areas and other areas opened to development. In cases where a utility-scale renewable energy development application is submitted in an area identified as having a high potential for conflict with the resources of a unit of the National Park System or special areas administered by the NPS, additional documentation will be required. This documentation may include information to verify any or all of the following potential resource conditions resulting from the proposed project:</p> <ul style="list-style-type: none"> <li>• Increased loading of fine particulates (criteria pollutants: PM 2.5 and PM10 [particulate matter with a diameter of 2.5 µm or less and 10 µm or less, respectively]) and reduced visibility in Class I and sensitive Class II areas;</li> <li>• Vulnerability of sensitive cultural sites and landscapes, loss of historical interpretative value due to destruction or vandalism;</li> <li>• Altered frequency and magnitude of floods, and water quantity and quality;</li> <li>• Reduced habitat quality and integrity and wildlife movement and/or migration corridors; increased isolation and mortality of key species;</li> <li>• Fragmentation of natural landscapes;</li> <li>• Diminished wilderness, scenic viewsheds, and night sky values on landscapes within and beyond boundaries of areas administered</li> </ul>

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						<p>by the NPS; and</p> <ul style="list-style-type: none"> <li>• Diminished cultural landscape qualities within and beyond boundaries administered by the NPS.</li> </ul> <p>The documentation provided by an applicant must be sufficiently detailed as determined by the DRECP agencies and NPS. The documentation should represent the findings of science and the analyses of scientifically trained specialists in the appropriate natural, visual, and/or cultural resource disciplines. The NPS will prepare a response to the DRECP agencies as to (1) whether the proposed project meets NPS protection, conservation, and/or restoration objectives; and (2) whether the resource conflict documentation is adequate to support a finding by the NPS and the DRECP agencies that the proposed project is likely to avoid a high potential for conflict with resources and values associated with a National Park or other special status area under the administration of the NPS.</p> <p>The NPS will continue to refine data for determining resource conflict and provide this information to the DRECP agencies. In all cases, evaluations will be performed to ensure that natural, visual, and cultural resources of units of the National Park System and other special areas administered by the NPS are protected.”</p>
253.	II	II	2.3	159		<p>Please incorporate this language as a Visual Resources CMA:</p> <p>“Special visual impact mitigation will be considered for renewable energy development and related transmission infrastructure on lands in proximate to and west of Township 005S and Range 017E and north of Township 006S and Range 016E, as well as north of Sections 26, 27, 28, 29, and 30 of Township 005S and Range 017E, and north of Sections 26, 27, and 28 of Township 005S and Range 016E. These areas are visible from and in close proximity to Joshua Tree National Park and the Palen-McCoy Wilderness Area, and thus have a higher potential to cause visual impacts on the National Park and the Wilderness Area. The DRECP agencies have identified these lands as potential high visual sensitivity areas, where renewable energy development and related transmission infrastructure is subject to additional mitigation that will be identified by the DRECP agencies, and the Bureau of Land Management (BLM) through the process of preparing parcels for competitive offer and subsequent project-specific analysis. These lands are shown in part in Figure 9.4.1.1-2 of the Final Solar Programmatic Environmental Impact Statement.”</p>
254.	II	II	2.3	3		<p>NPS suggests that the DRECP agencies reconsider the decision to include the Solar Programmatic Impact Statement variance lands in the Action Alternatives. Some of these areas have been identified as Area of High Potential Resource Conflict by the NPS. It is our understanding that the proposed Development Focus Areas were specifically designed, and are sufficient, to meet the State's renewable energy goals as set forth by the California Energy Commission. We acknowledge that new policies are intended to steer development into the DFAs and assure that early engagement occurs with the NPS to identify concerns in the application process. NPS asserts, however, that the cumulative potential outcome of the development of the public lands or “variance lands” outside the DFAs is poorly understood. Moreover, many of the proposed variance areas are small. We would question a decision to guide renewable energy development toward small, isolated parcels in preference to concentrated development in DFAs selected for low potential resource conflict. Moreover, the variance process does not appear to address how the BLM will screen applications that propose to utilize small federal land parcels in</p>

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						support of renewable energy development on adjacent non-federal lands. Further analysis is needed to determine if parcels smaller than the calculated minimum acres (247 ac.) required for a utility-scale project should be retained. NPS recommends the DRECP agencies remove variance lands from all Action Alternatives.
255.	II	II	2.3	342		NPS is concerned about the potential development south of Highway 15 and west of the Mojave National Preserve and Zzyzx Road (in the vicinity of the proposed Soda Mountain Solar Project). We ask that the DRECP agencies consider designating this area for conservation. The area is a significant wildlife corridor for multiple species including but not limited to Big Horn Sheep and the Threatened Desert Tortoise. Recent scientific research including the USGS Desert Tortoise Existing Habitat Model, SC Wildlands “California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California” and the “Optimizing dispersal and corridor models using landscape genetics” by Clint Epps, John D. Wehausen, et. al.) clearly show the project area is located within an important connectivity corridor. A research project is needed that would apply the genetics and corridor modeling cited above directly to the issue of habitat fragmentation and incursion caused by proposed energy projects.
256.	II	II	2.3	345		NPS is concerned about the potential for development in the Silurian Valley close to Highway 127 north of Baker. We ask the DRECP agencies to designate this area for conservation to protect its superlative natural and cultural features. This is in an area identified as Area of High Potential Resource Conflict by the NPS including categories of wind erodibility, roadless natural area values, high naturalness indices, dark night skies, and viewshed. Renewable energy development could be seen from Mojave National Preserve, Death Valley National Park, and the major southern access corridor (Highway 127) through Baker which is known as a gateway community to Death Valley. This important scenic corridor is not presently affected by modern industrial sites. Development would be highly visible from various important historic sites including the Congressionally-designated Old Spanish National Historic Trail, The Tonopah & Tidewater Railroad grade, the historic mining camp of Riggs, the Salt Creek ACEC, the Kingston Range Wilderness and many historic mine sites. The Silurian Valley is a “high potential route segment” of the Old Spanish National Historic Trail. This term is defined in the National Trails System Act of 1968 (as amended) as “those segments of a trail which would afford high quality recreation experience in a portion of the route having higher than average scenic values or affording an opportunity to vicariously share the experience of the original users of a historic route.” Development of the Silurian Valley would have a significant adverse impact on one of the most pristine, highway accessible stretches of the Old Spanish National Historic Trail. The quality and integrity of trail segments, associated sites, and the trail setting provide the visitor with the opportunity “to vicariously share the experience of the original users of a historic route” (National Trails System Act of 1968) make this one of the premier trail experiences anywhere along the Old Spanish NHT. The potential scope of renewable energy development in this area would adversely affect the trail viewshed—and other fragile, nonrenewable natural and cultural resources—for many miles in all directions.
257.	II	II	II.5			NPS submits that the proposed DFAs in Alternative 2, immediately adjacent to the northwest corner of Joshua Tree National Park could create significant resource conflicts due to their adjacency to the Park as well as the Big Morongo Canyon Preserve and the town of Yucca

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						Valley. We suggest that the DRECP agencies do not include this area as a DFA in any Action Alternative... Development in this area could encroach on values of dark skies, naturalness, the park experience for visitors (near Black Rock Campground) and potentially habitat corridors for species between the NPS and BLM. The DFAs appear to be immediately adjacent to moderately dense residential areas and a Yucca Valley town park (South Park).
258.	IV	IV	IV.3			This section describes impact to climate change, and the NPS recommends further impact analysis regarding impacts from climate change as well. Climate change is likely to cause temperature increases, shifts in precipitation patterns, modifications and/or reductions in species suitable habitat, and consequent migrations and/or loss of species on a time-scale similar to the life of this plan. The plan generally considers species and habitats where they are now, and the NPS recommends full consideration and discussion of the future potential effects of climate change..
259.	II	II	All Action Alternatives			There is a block of approximately six sections of land between Joshua Tree National Park and the Riverside East SEZ/DFA that NPS recommends for conservation designation. Southeast of the Coxcomb Mountains of Joshua Tree NP and Highway 177, and immediately north of the boundary of the Riverside East SEZ the area is critical for conservation for the following reasons:1) This parcel is directly in the path of a large sand corridor for distribution in a northwest-southeast direction; this is very visible on aerial photos of the area. 2) The intermittent Palen Lake boundaries and its associated wetlands are identified within the eastern portions of this parcel. This is a highly sensitive area that has otherwise been removed from development by excluding it from the SEZ. 3) This parcel is in an area identified as Area of High Potential Resource Conflict by the NPS including categories of wind erodibility, wetlands, roadless natural area values, high naturalness indices, dark night skies, and viewshed. 4) This parcel's closest boundary appears to be less than one mile from the park boundary and is within Potential High Visual Sensitivity Area identified in the Solar PEIS. 5) This block of land is immediately east of and adjacent to the Desert Lily Preserve and is likely to contain similar habitat to assist in the preservation of this species. In discussions between the NPS and local BLM staff, this parcel was specifically excluded from the Riverside SEZ in the Solar PEIS for the reasons stated above.
260.	II	II	All Action Alternatives			The NPS has identified numerous resource concerns about the potential impact of development focus areas (DFAs) that are within close proximity to park boundaries and/or coincident wilderness boundaries. Additionally, any areas that are not specified or classified under this DRECP are of heightened concern to the National Park Service, due to the ongoing uncertainty about industrial development. LSome areas within close proximity to Joshua Tree National Park are considered high conflict areas with respect to with respect to indirect, direct, and cumulative cross-boundary impacts to the mission, resources, and values of the park as outlined in the enabling legislation. Where potential development in DFA's, variance lands, or undesignated lands are within close proximity to Joshua Tree National Park boundaries, resource values at risk include:  1. <u>Wilderness Character</u>

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						<p>1.1. Joshua Tree National Park currently encompasses 792,623 acres of protection under the NPS Organic Act of 1916, as amended. Of this total acreage, 591,624 (~75%) of the park is congressionally designated wilderness. An additional 74,179 of proposed wilderness awaits designation, pending inholding status. The potential (near future) wilderness designation is anticipated to be approximately 84 percent of the park.</p> <p>1.2. In 2010 Joshua Tree National Park conducted a visitor survey. The following resources were ranked by visitors as “extremely Important” for resource protection: 1) undeveloped viewsheds of the wilderness (90%); 2) clean air (89%) and 3) natural sounds/quiet (88%) all of which are defining characteristics of the wilderness experience.</p> <p>2. <u>Air Quality for Class I Areas</u></p> <p>2.1. All wilderness areas are Class I areas for air quality standards. Therefore, 75 percent of the park designated as a Class I area for air quality standards. Joshua Tree National Park monitors air quality at three locations (western, central and eastern) across two air basins (Salton Sea and Mojave Deserts). The management districts that have jurisdiction over the park are Mojave AQMD and the South Coast AQMD.</p> <p>2.2. Air quality throughout the western half of the park is in non-attainment for 8-hr ozone and PM10. In general, air quality improves in the eastern regions with the most pristine air quality in the Coxcombs and eastern Eagle Mountains (adjacent the Riverside East Solar Energy Zone).</p> <p>3. <u>Night Sky / Light Pollution</u></p> <p>3.1. Joshua Tree National Park is currently in the process of applying for an International Dark Sky Park Designation. According to a 2010 visitor survey, 65% of park visitation considers night sky viewing an extremely important resource attribute. The quality of night sky increases while traversing from the west to the eastern skies. However, the park is still considered one of the best night sky viewing areas within close proximity to Coachella Valley and Los Angeles. Every year a minimum of 12 night sky programs are conducted within the park in addition to multiple programs in cooperation with external non-governmental groups.</p> <p>3.2. Night sky/ light pollution baseline has been established at three locations across the park (western, central and eastern regions of the park) and is conducted on a project by project basis. Current monitoring efforts include the eastern portion of the park adjacent the Riverside East Solar Energy Zone.</p> <p>4. <u>Natural Undeveloped Viewsheds</u></p> <p>4.1. According to a 2010 visitor survey, 90 percent of park visitors consider undeveloped viewshed as an “extremely- important” resource for protection. Numerous scenic vistas within the park peer out from mountain tops into the areas identified in this DRECP. Some examples include Eureka Peak from the north western part of the park overlooking the Little San Bernardino</p>

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						<p>Mountains and Yucca Valley; Cottonwood Peak overlooks the East Riverside Solar Energy Zone; Coxcomb Peak overlooks the “key-hole<sup>1</sup>” area (Eagle Mountain Mine) and the Riverside Solar Energy Zone and Development Focus Area.</p> <p>5. <u>Soundscapes / Anthropogenic induced sound pollution</u>                      5.1. With 75 percent of the park designated wilderness, natural ambient sound ranks very high for resource protection. Natural ambient sound in wilderness areas can be as low as 35dbA<sup>2</sup>. Maintaining the natural quiet from external sources is another “extremely-Important” resource to protect.</p> <p>6. <u>Cultural Landscapes/ Viewshed</u>                      6.1. Humans have occupied the area encompassed by Joshua Tree National Park for at least 5,000 years. The first group known to inhabit the area was the Pinto Culture, followed by the Serrano, the Chemehuevi, and the Cahuilla. Native American sites throughout the park have been discovered and recorded. In addition, to the recordation and preservation of these important sites, the park has begun documenting the oral histories of local tribe members and elders to piece together some of the cultural traditional uses of the area. A large part of their story relates to the undeveloped viewshed and landscape.                      6.2. Inventory of the all the sites in the park is far from complete with only 3% of the park completed to date. A concerted effort to inventory must be conducted before the landscape is irreversibly altered by utility-scale development.</p> <p>7. <u>Natural Hydrologic Function</u>                      7.1. Maintaining a natural hydrologic function is critical in the arid southwest relying on groundwater reserves. One area of concern for the park is where groundwater basins within the park are in hydraulic communication with external basins that are being for development of municipal uses. The Pinto Basin within the park is a basin that is in communications with the Chuckwalla basin outside of the park. The Chuckwalla basin is the water source for numerous proposed and potential energy projects.</p> <p>8. <u>Wildlife connectivity</u>                      Animal communities within Joshua Tree National Park rely on open connections with populations found outside of the park for long term viability. Desert bighorn sheep are prime examples of the importance of these open corridors for the purposes of both immigration and emigration from herds located in the park to herds located outside of the park (Epps et. al. 2010; Journal of Wildlife Management 74(3):522–531). The desert tortoise is another species where connectivity between populations found within the park and to protected areas to the south (e.g. Chuckwalla DWMA) must traverse BLM lands covered under this plan.</p>
261.	II	II	All Action Alternativ			The NPS has identified numerous resource concerns about the potential impact of utility-scale development) within close proximity to Mojave National Preserve boundaries and/or coincident wilderness boundaries. Areas of concern include undesignated lands, Future

<sup>1</sup> “Key-hole” refers to the Former Eagle Mountain Mine Site

<sup>2</sup> dbA refers to A-weighted decibel range equivalent to the human range of hearing

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			es			<p>Assessment Areas, Special Analysis Areas, and variance lands. Certain areas within close proximity to Mojave National Preserve are considered high conflict areas with respect to the mission and enabling legislation. Resource values at risk include:</p> <p>9. <u>Wilderness Character</u></p> <p>9.1. Mojave National Preserve currently encompasses 1,589,165 acres protected under the NPS Organic Act of 1916, as amended, of which 806,086 acres (~51%) is congressionally designated wilderness.</p> <p>9.2. In 2003 the University of Idaho conducted a visitor survey. The following resources were ranked by visitors as “extremely important” and “very important” ratings included clean air (73%), wilderness/open space (71%), and solitude/quiet (69%) all of which are defining characteristics of the wilderness experience. Other opinions frequently expressed regarding the preserve’s significance included: unspoiled/undisturbed natural area, protected wildlife habitats, an open desert area, and preservation of the natural beauty of area.</p> <p>10. <u>Night Sky / Light Pollution</u></p> <p>10.1. Dark night sky is an increasingly valuable resource in the preserve. The preserve’s General Management Plan states that the NPS will strive to “minimize reflected light and artificial light intrusion on the dark night sky, recognizing the essential component that a carpet of stars against a black night sky is for a natural outdoor experience.”</p> <p>11. <u>Natural Undeveloped Viewsheds</u></p> <p>11.1. According to a 2003 visitor survey, one of the three most important features/qualities that encouraged visitation to Mojave National Preserve was the scenic vistas (34%).</p> <p>12. <u>Soundscapes / Anthropogenic induced sound pollution</u></p> <p>12.1. With 51 percent of the park designated wilderness, natural ambient sound ranks very high for resource protection. Natural ambient sound in wilderness areas can be as low as 35dbA<sup>3</sup>. Maintaining the natural quiet from external sources is another “extremely-Important” resource to protect.</p> <p>13. <u>Cultural Landscapes/ Viewshed</u></p> <p>13.1. Indigenous cultures, both ancient and contemporary, have influenced the vibrant history of Mojave National Preserve over the past 10,000 years. Tangible objects such as projectile points, metates, pottery sherds, and rock art sites connect to the stories, history, and culture of the Mojave and Chemehuevi tribes. The preserve’s enabling legislation calls for the protection and interpretation of these resources and values.</p> <p>14. <u>Natural Hydrologic Function</u></p> <p>14.1. Maintaining a natural hydrologic function is critical in the arid southwest relying on groundwater reserves. One area of</p>

<sup>3</sup> dbA refers to A-weighted decibel range equivalent to the human range of hearing

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						<p>concern for the preserve is groundwater extraction in basins that may be in hydraulic communication with external basins.</p> <p><b>15. <u>Wildlife connectivity</u></b></p> <p>15.1. Animal communities within Mojave National Preserve rely on open connections with populations found outside of the preserve for long term viability. Desert bighorn sheep are prime examples of the importance of these open corridors for the purposes of both immigration and emigration from herds located in the park to herds located outside of the park (Epps et. al. 2010; Journal of Wildlife Management 74(3):522–531). The desert tortoise is another species where connectivity between populations found within the preserve to populations in areas slated for development, such as the Ivanpah Valley, are crucial to the long-term survival and eventual recovery of the species.</p>
262.	II	II	All Action Alternatives			NPS respectfully requests consideration of technology limitations within certain DFAs where necessary to avoid significant resource conflicts. For example, the western portion of Riverside East SEZ/DFA (west of the Palen Dry Lake bed and southwest of the Palen Mountains) is identified as a Development Focus Area. Utility scale renewable energy development featuring solar power towers or wind turbines that are hundreds of feet tall and highly visible would be incompatible with NPS resource values. That area is identified as an area of High Visual Sensitivity in the BLM Solar PEIS, and as an Area of High Potential Resource Concern for the National Park Service. In this area and in other areas of High Visual Sensitivity, please apply Conservation and Management Actions that would limit development to structures with low visual resource impacts.
263.	Appendix L Amargosa South					The NPS appreciates recognition of the Old Spanish National Historic Trail as a nationally significant value of the Amargosa South unit. To protect nationally significant NHT resources, NPS recommends the designation of the area as NLCS, as proposed in the agency Preferred Alternative.
264.	Appendix L Shadow Valley					<p>The NPS appreciates recognition of the Old Spanish National Historic Trail as a nationally significant value of the Amargosa South unit. To protect nationally significant NHT resources, NPS recommends the designation of 213,600 acres as ACEC, with 183,300 acres in NLCS, as proposed in Alternative 3. Please include this area of designation in the FEIS Agency Preferred Alternative. Please also add the following to the management objectives, as seen in the management objectives of other ACEC’s within the Plan Area:</p> <p>Objective: Administer and manage trail resources in accordance with Old Spanish Trail Comprehensive Management Plan, NTSA, FLMPA, local RMPs, and agency policy and direction.</p> <p>Allowable Uses: Research, interpretation, recreation.</p> <p>Management Action: Designate Trail Management Corridor</p>
265.	Appendix L					The NPS appreciates recognition of the Juan Bautista de Anza National Historic Trail as a nationally significant value of the Amargosa South

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	West Mesa					unit. To protect nationally significant NHT resources, NPS recommends the designation of 115,100 acres of the area as NLCS, as proposed in Alternative 2. Please include this designation in the Preferred Alternative in the Final EIS. Please change the reference in the Management Objectives from “Old Spanish National Historic Trail” to “Juan Bautista de Anza National Historic Trail”.
266.	Appendix L San Sebastian Marsh-San Felipe Creek					The NPS appreciates recognition of the Juan Bautista de Anza National Historic Trail as a nationally significant value of the Amargosa South unit. To protect nationally significant NHT resources, NPS recommends the designation of 6500 acres of the area as NLCS, as proposed in all Action Alternatives. Please change the reference in the Management Objectives from “Old Spanish National Historic Trail” to “Juan Bautista de Anza National Historic Trail”.
267.	Appendix L Dumont Dunes ACEC					The NPS appreciates recognition of the Old Spanish National Historic Trail as a nationally significant value. To protect nationally significant NHT resources, NPS recommends the designation of 11,500 acres as ACEC and as NLCS, as proposed in Alternative 3. Please include this area of designation in the FEIS Agency Preferred Alternative.
268.	Appendix L Afton Canyon ACEC					The NPS appreciates recognition of the Old Spanish National Historic Trail as a nationally significant value. To protect nationally significant NHT resources, NPS recommends the designation of 8,800 acres as ACEC and as NLCS, as proposed in Alternative 2. Please include this area of designation in the FEIS Agency Preferred Alternative.
269.	Appendix L Manix Paleontologic al Area					The NPS appreciates inclusion of Old Spanish National Historic Trail management objectives in this area. Please add discussion of the Old Spanish Trail to the section on Nationally Significant Values.
270.	Appendix L Barstow Mojave Fringe-toed Lizard ACEC					The NPS appreciates inclusion of Old Spanish National Historic Trail management objectives in this area. Please add discussion of the Old Spanish Trail to the section on Relevance and Importance Criteria.
271.	Appendix L Parish’s Phacelia ACEC					The NPS appreciates inclusion of Old Spanish National Historic Trail management objectives in this area. Please add discussion of the Old Spanish Trail to the section on Relevance and Importance Criteria.
272.	Appendix L Salt Creek Hills ACEC					The NPS appreciates recognition of the Old Spanish National Historic Trail as a nationally significant value. To protect nationally significant NHT resources, NPS recommends the designation of 2,200 acres as ACEC and as NLCS, as proposed in several Alternatives. Please include this area of designation in the FEIS Agency Preferred Alternative.
273.	Appendix L Superior Cronese					The NPS appreciates inclusion of Old Spanish National Historic Trail management objectives in this area. Please include recognition of the Old Spanish National Historic Trail in the description of Nationally Significant Values. To protect nationally significant NHT resources as

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						well as biological resources in this area, NPS recommends the designation of 414,000 acres as ACEC as proposed in Alternative 3, and the designation of 287,400 acres as NLCS, as proposed in Alternative 2. Please include these designations in the FEIS Agency Preferred Alternative.
274.	Appendix L National Trails Viewshed SRMA					The NPS appreciates recognition of the Old Spanish National Historic Trail in this region, and advocates for protection of trail resources. It is difficult to understand from this SRMA description and from the maps how the SRMA designation may overlay other designations, and what benefits or impacts may occur from the SRMA designation. Please clearly map or describe overlaying designations such as ACEC and NLCS lands, and analyze in Chapter Four how SRMA designation and related activities will affect the regionally or nationally significant values for which the ACEC or NLCS designations were created. Also, the SRMA description should include discussion related to the Old Spanish National Historic Trail resources and management corridor in the sections for “Recreation and Visitor Services Program” and “Implementation Decisions”.
275.	Appendix L Amargosa/Grimshaw SRMA					The NPS appreciates recognition of the Old Spanish National Historic Trail in this region, and advocates for protection of trail resources. It is difficult to understand from this SRMA description and from the maps how the SRMA designation may overlay other designations, and what benefits or impacts may occur from the SRMA designation. Please clearly map or describe overlaying designations such as ACEC and NLCS lands, and analyze in Chapter Four how SRMA designation and related activities will affect the regionally or nationally significant values for which the ACEC or NLCS designations were created. Also, the SRMA description should include management objectives related to the Old Spanish National Historic Trail resources and management corridor. Also, the SRMA description should include discussion related to the Old Spanish National Historic Trail resources and management corridor in the sections for “Recreation and Visitor Services Program” and “Implementation Decisions”.
276.	Appendix L Afton Canyon SRMA					The NPS appreciates recognition of the Old Spanish National Historic Trail in this region, and advocates for protection of trail resources. It is difficult to understand from this SRMA description and from the maps how the SRMA designation may overlay other designations, and what benefits or impacts may occur from the SRMA designation. Please clearly map or describe overlaying designations such as ACEC and NLCS lands, and analyze in Chapter Four how SRMA designation and related activities will affect the regionally or nationally significant values for which the ACEC or NLCS designations were created. Also, the SRMA description should include management objectives related to the Old Spanish National Historic Trail resources and management corridor. Also, the SRMA description should include discussion related to the Old Spanish National Historic Trail resources and management corridor in the sections for “Recreation and Visitor Services Program” and “Implementation Decisions”.
277.	II	II	All Action Alternatives			The National Park Service is concerned about potential impacts to NPS resources from the proposed Hidden Hills Development Focus Area. In analysis for the proposed Hidden Hills Solar Energy Generating Station Project Area of Analysis (HHSEGS PAA), the California Energy

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						<p>Commission staff assessment included this text, which has the full concurrence of the NPS:</p> <p>“At least one historical built-environment resource, the Old Spanish Trail-Mormon Road, has been identified in the HHSEGS PAA thus far. Substantial information, including the National Register of Historic Places nomination of the Nevada segments of the Old Spanish Trail, has led staff to conclude that, within the PAA, this resource is not represented by a single route, but as a corridor of converging and intermingled tracks and trails. The project site is located within this corridor, with traces running throughout the project site. Staff has concluded that that the impacts of the proposed HHSGS project to this Old Spanish Trail-Mormon Road Northern Corridor (Corridor) would be significant and, even with full implementation of [mitigation measures] CUL-9 and CUL-12, would not be mitigated to a less than significant level.”</p> <p>In addition to concerns regarding the Old Spanish National Historic Trail, the National Park Service has other resource concerns. The HHSEGS proposal included 750-foot high towers, which would be visible from portions of Death Valley National Park. Figure 14 shows a preliminary Death Valley National Park viewshed analysis indicating visibility of the towers within the park. Further analysis is needed to understand the full visual resource impacts of potential development within the proposed Development Focus Area.</p> <p>Water use related to renewable energy development is also of concern, and the potential impacts are not understood. The NPS recommends conservation designations for this area, rather than designations allowing or streamlining renewable energy development.</p>
278.	Glossary			2		<p>The NPS requests further clarity on the “BLM Disturbance Cap”. The disturbance cap may be a valuable tool for maintaining nationally or regionally significant values on conservation lands. Please clarify whether the disturbance cap refers to new disturbance only, or would include past disturbance. Please define the categories of land use that constitute “disturbance”. Please also clarify how the current disturbance level would be determined before a proposed project, and how consistency would be achieved among disturbance level determinations.</p>

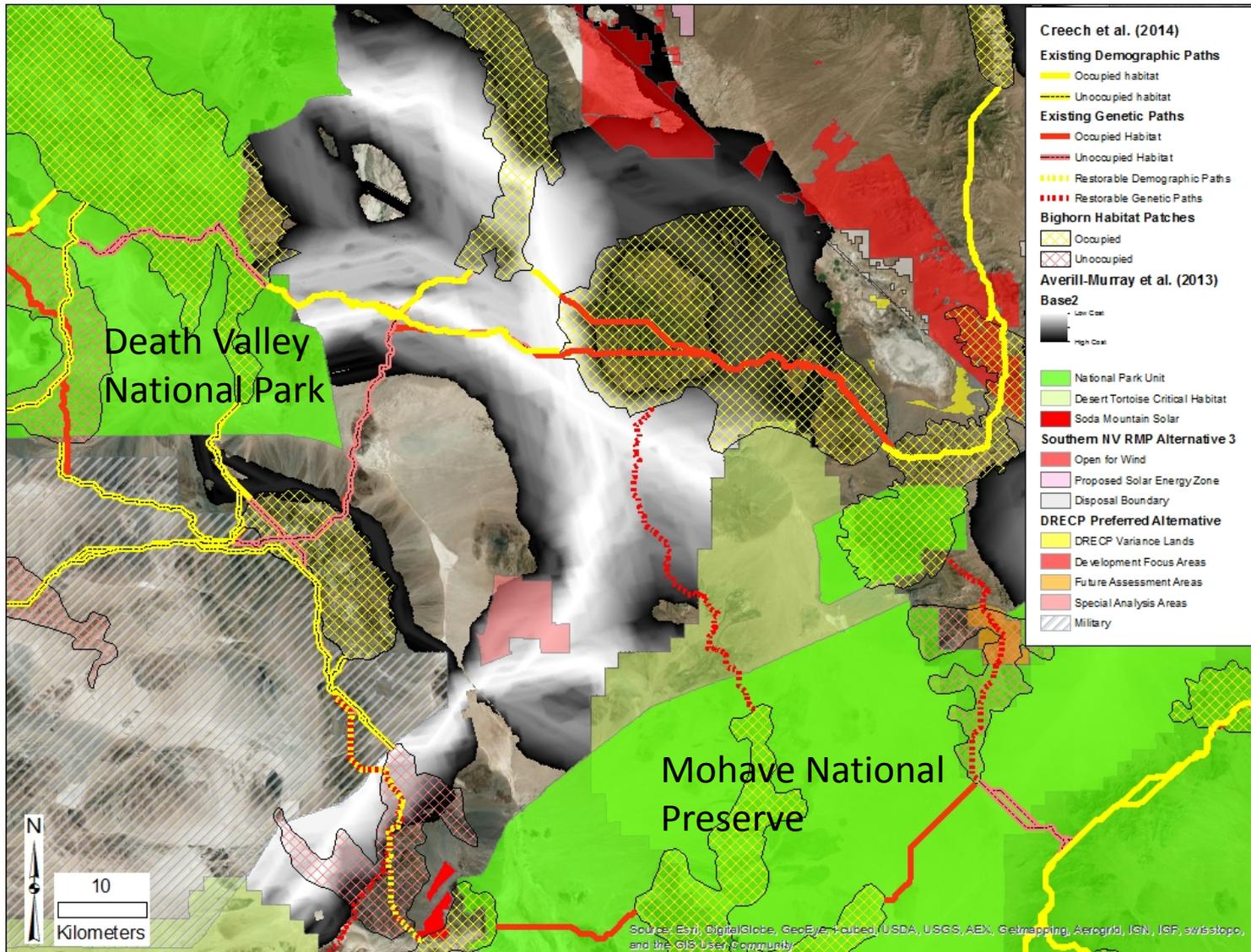


Figure 1. Bighorn sheep habitat linkage in the Soda Mountain Area, as identified by Crech et al. (2014).

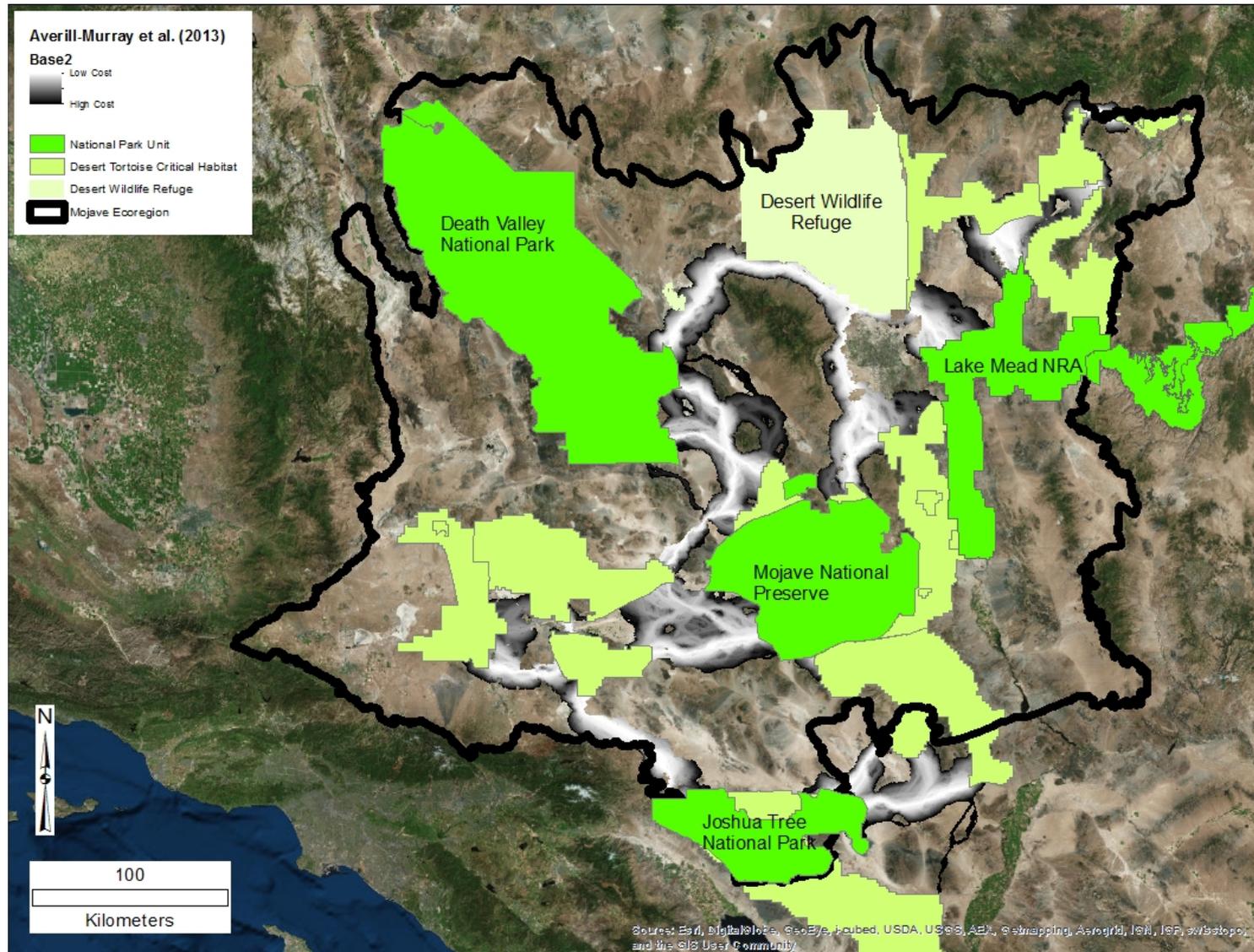


Figure 2. Desert tortoise habitat connectivity among National Park Service units identified in Averill-Murray et al. (2013).

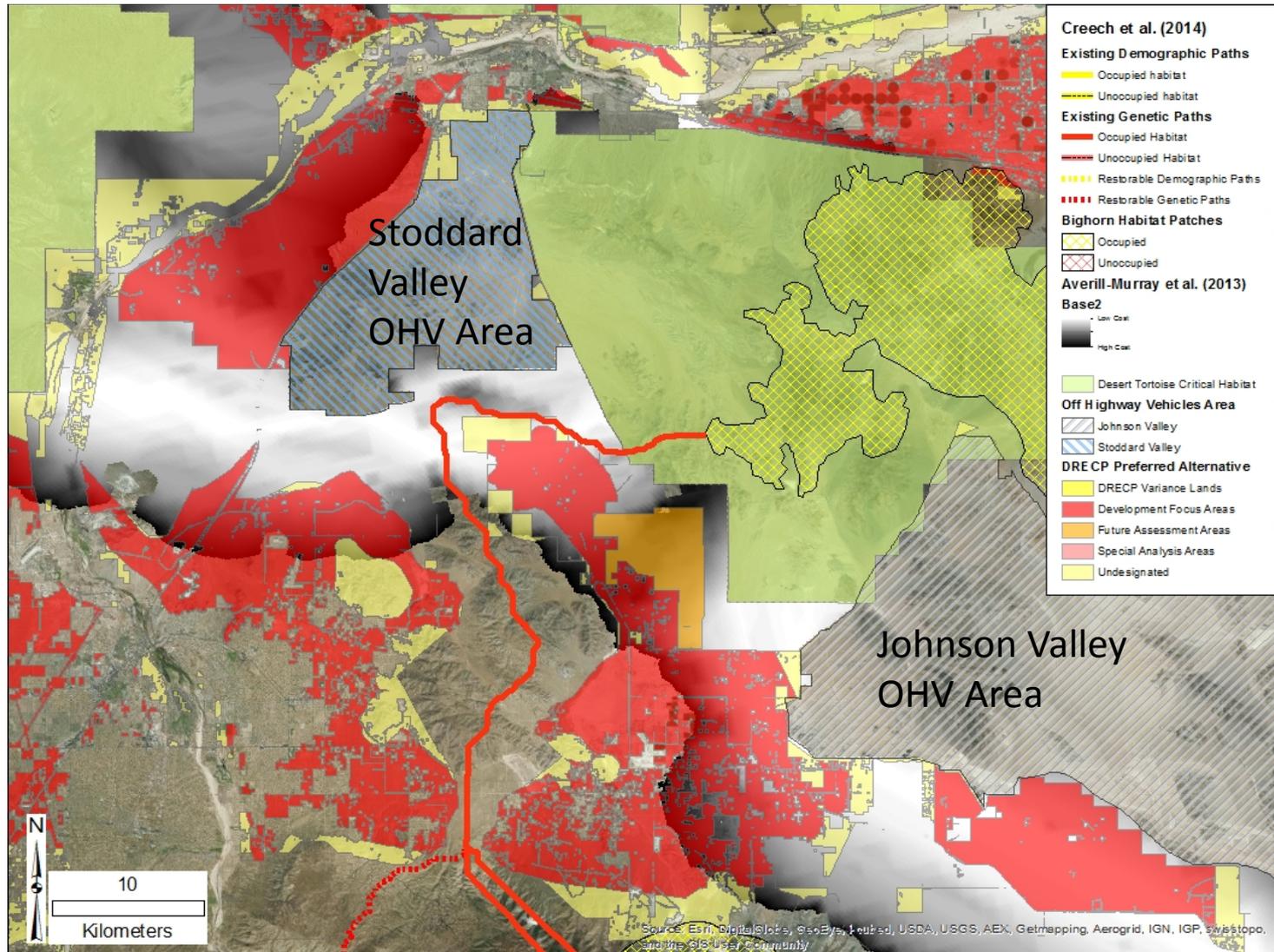


Figure 3. Desert tortoise connectivity and proposed Development Focus Areas and a Future Assessment Area.

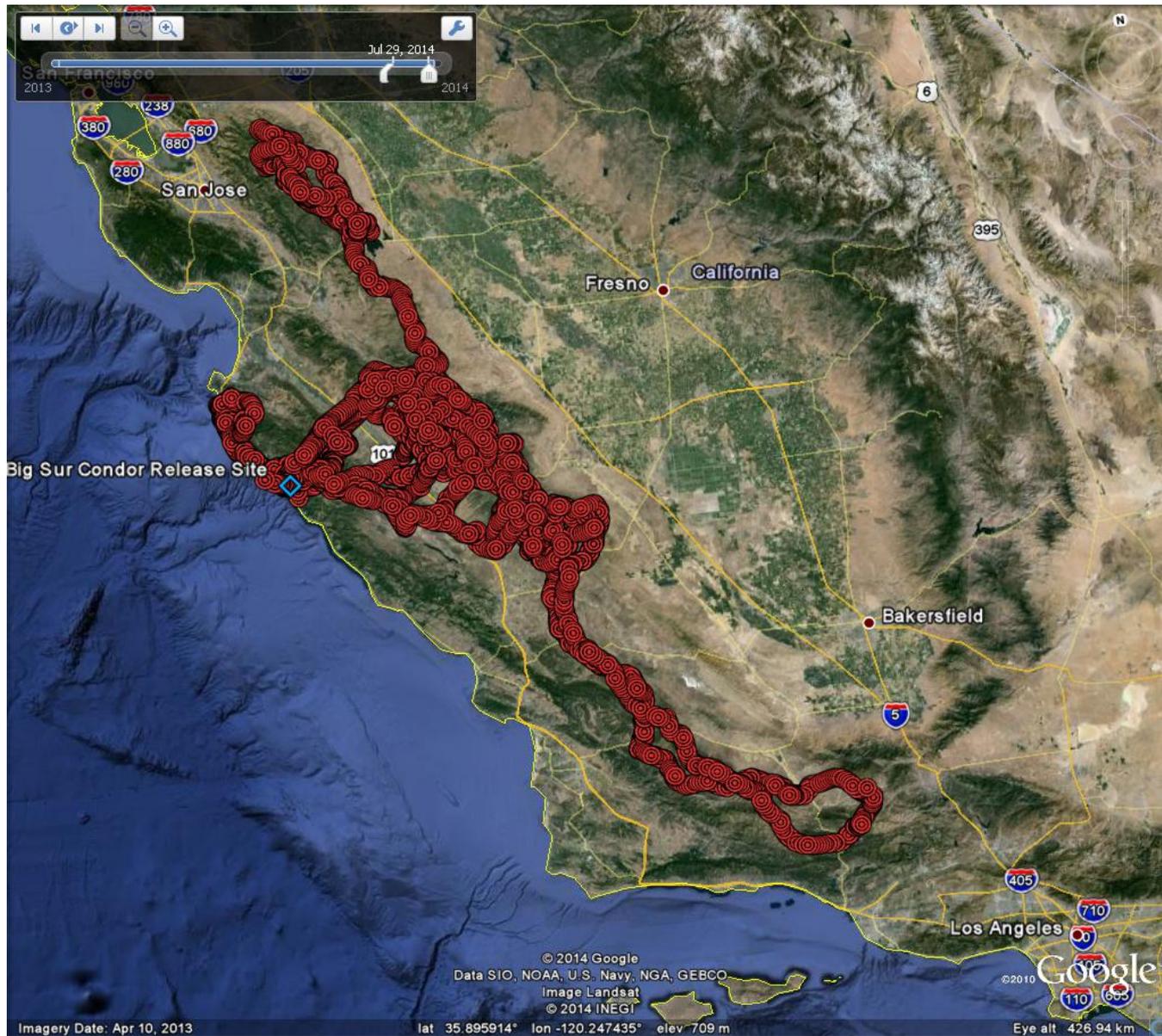


Figure 4. Condor movements between northern and southern California of a 4-year old male for a 3-week period in July, 2014. Courtesy of Joe Burnett of the Ventana Wildlife Society.

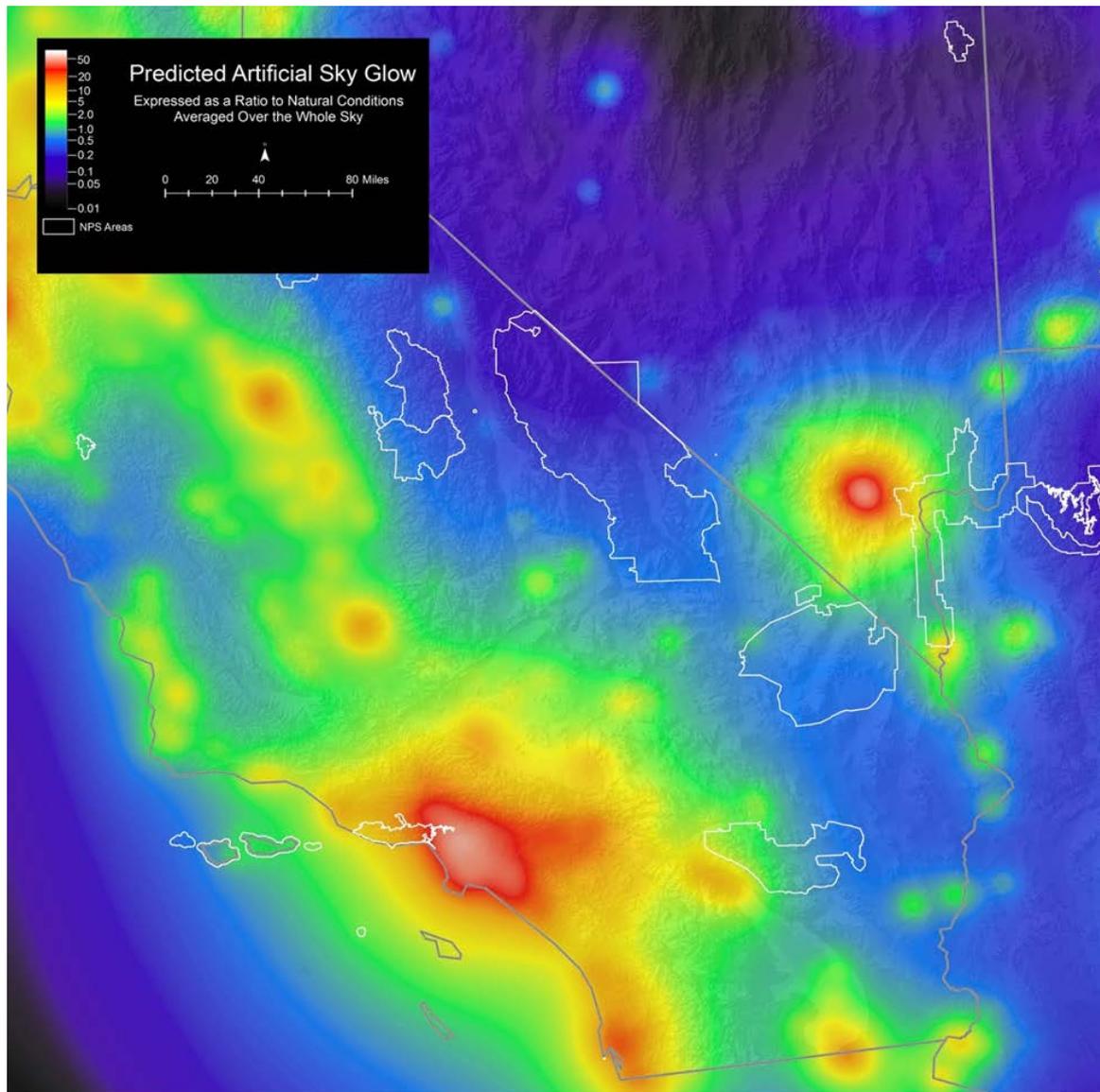


Figure 5. Predicted Artificial Skyglow in Southern California, NPS, 2014.

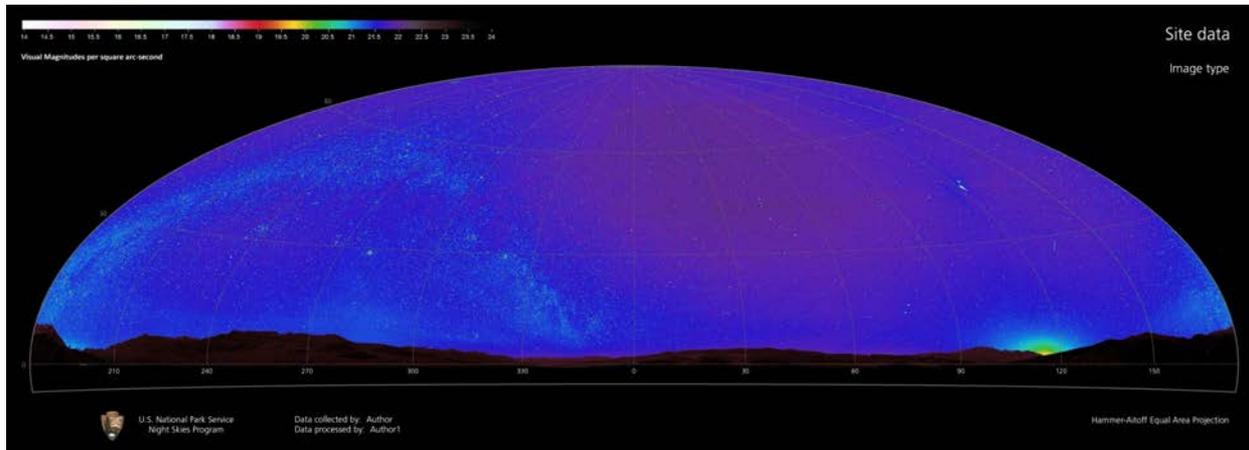


Figure 6. Death Valley NP - Panoramic image of all-sky brightness in false color, shows nearby light domes.

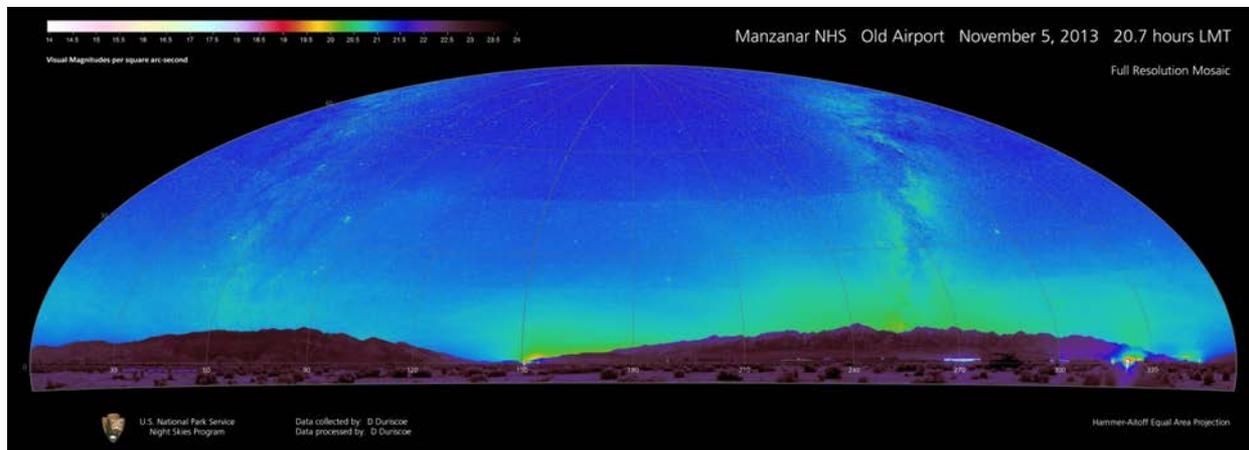


Figure 7. Manzanar NHS - Panoramic image of all-sky brightness in false color, shows nearby light domes.

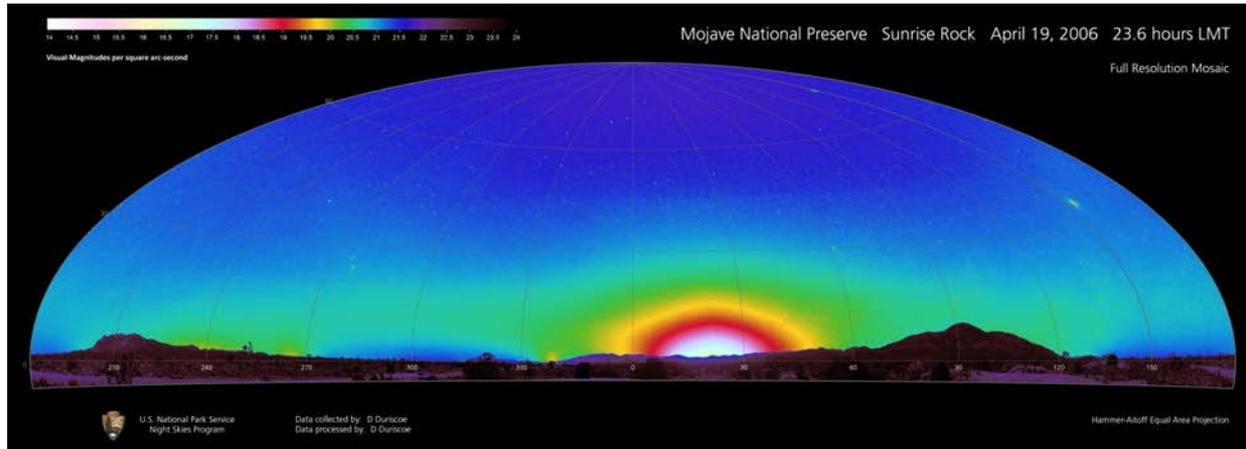


Figure 8. Mojave NP - Panoramic image of all-sky brightness in false color, shows nearby light domes.

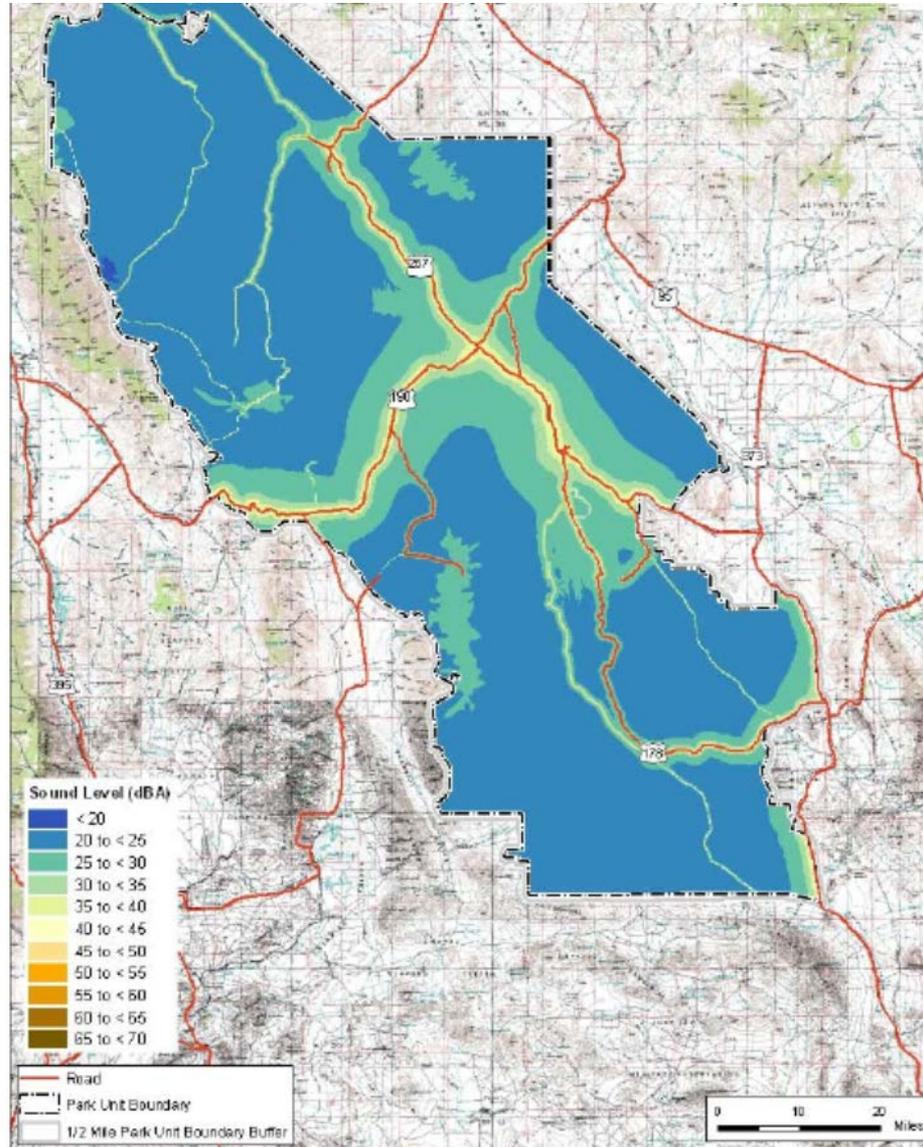


Figure I. Existing ambient sound levels in Death Valley National Park, without air tours, summer.

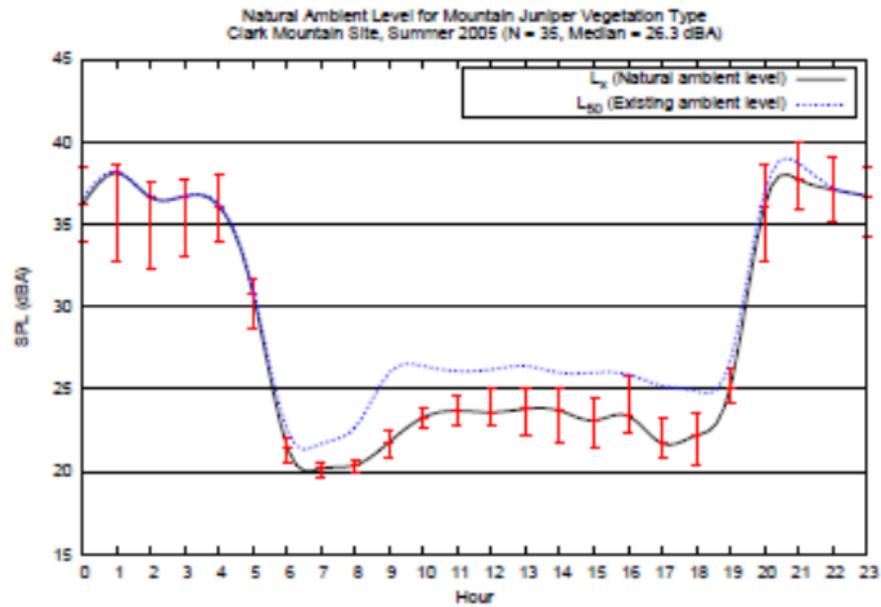


Figure 9. Sound Pressure Levels over time in Mojave National Preserve, 2006.

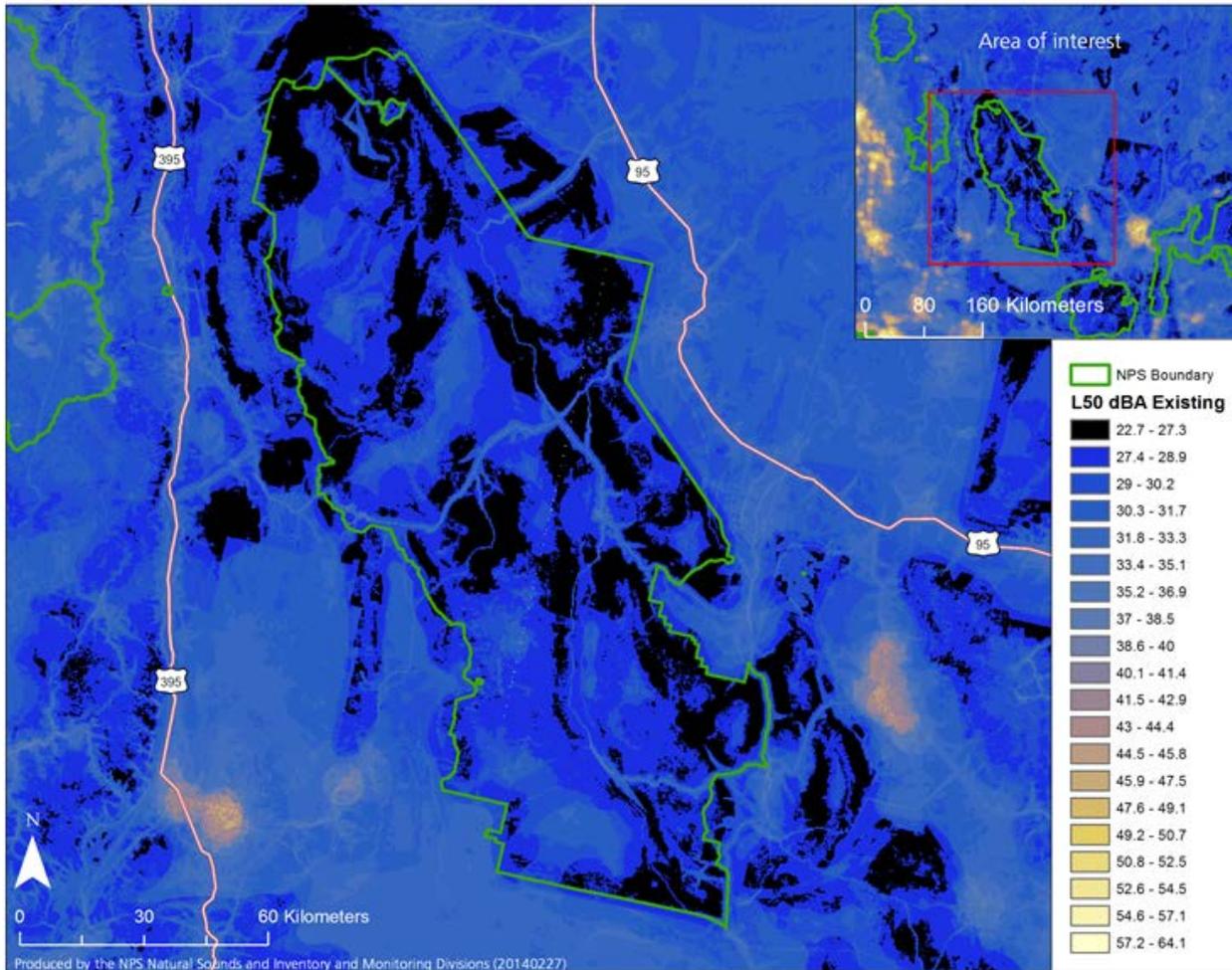


Figure 10. Predicted existing sound levels at Death Valley National Park.

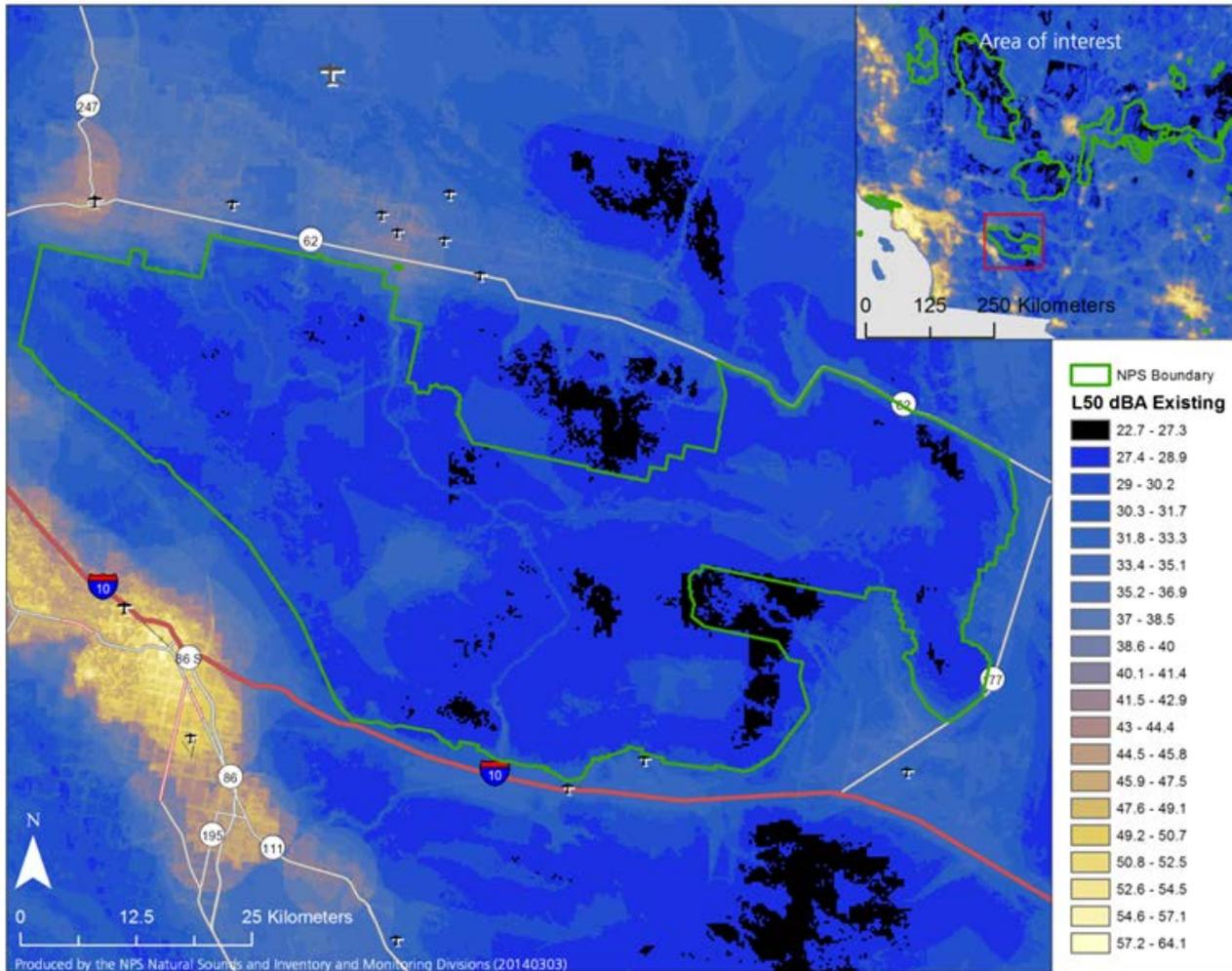


Figure 11. Predicted existing sound levels at Joshua Tree National Park.

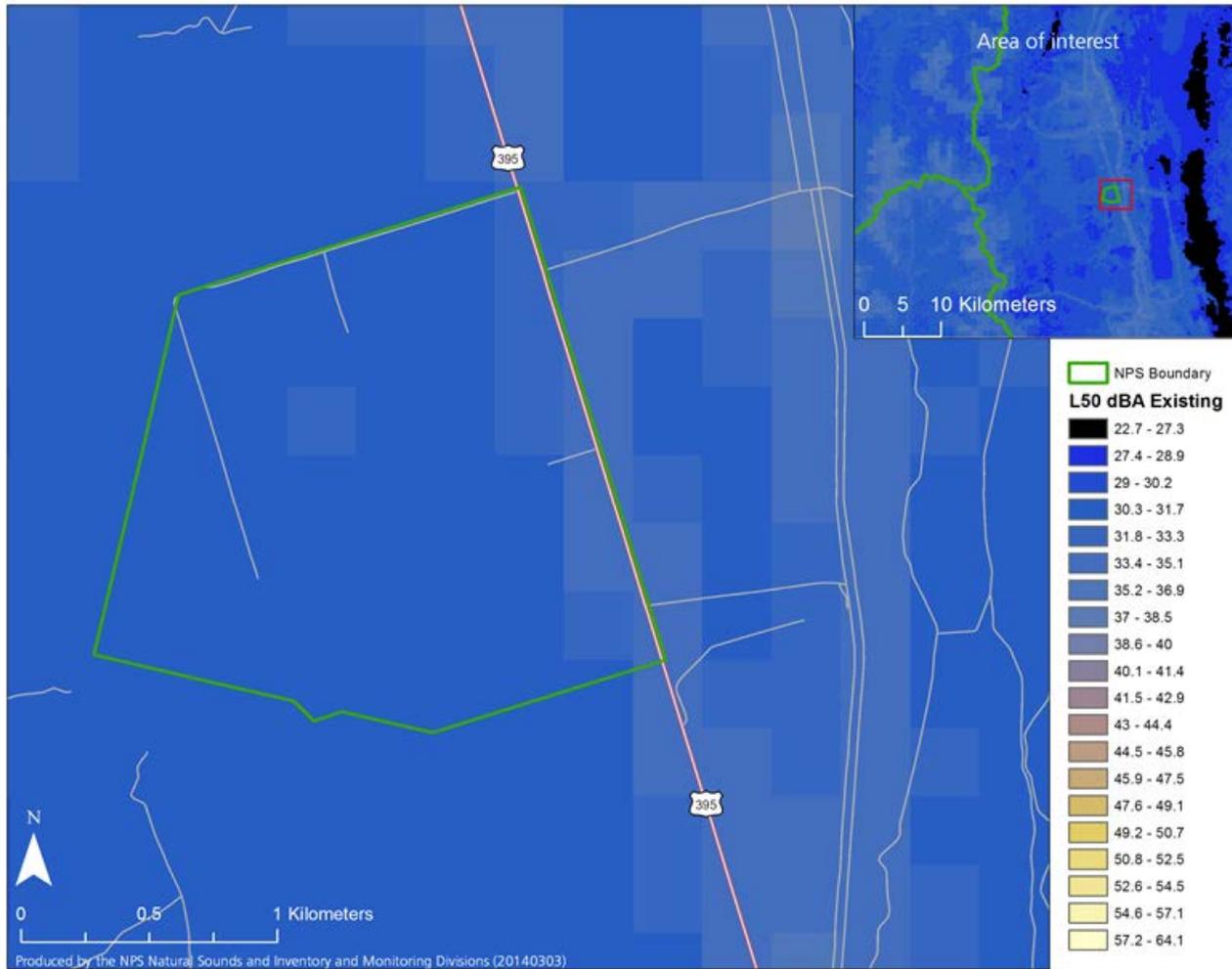


Figure 12. Predicted existing sound levels at MANZ.

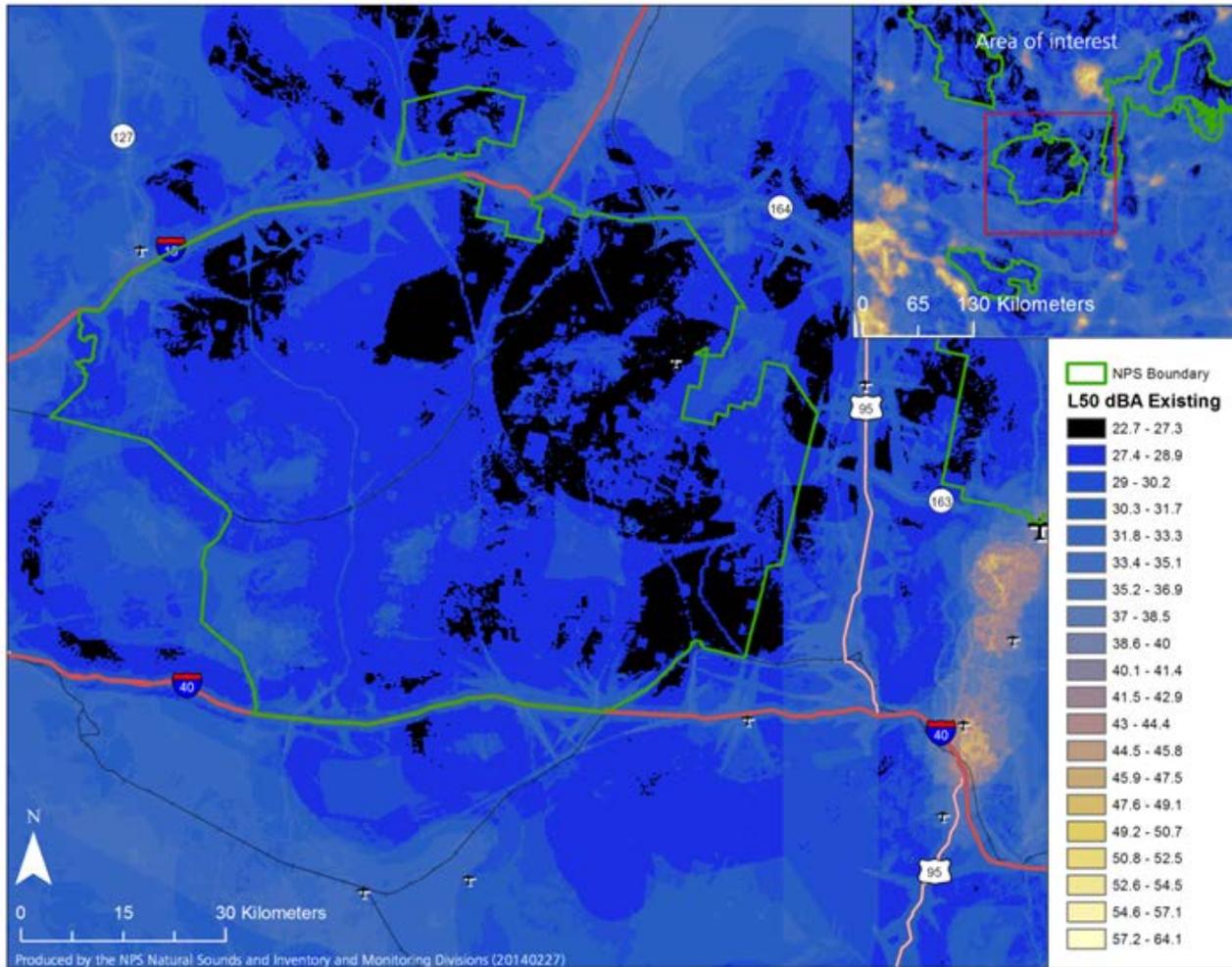


Figure 13. Predicted existing sound levels at Mojave National Preserve.

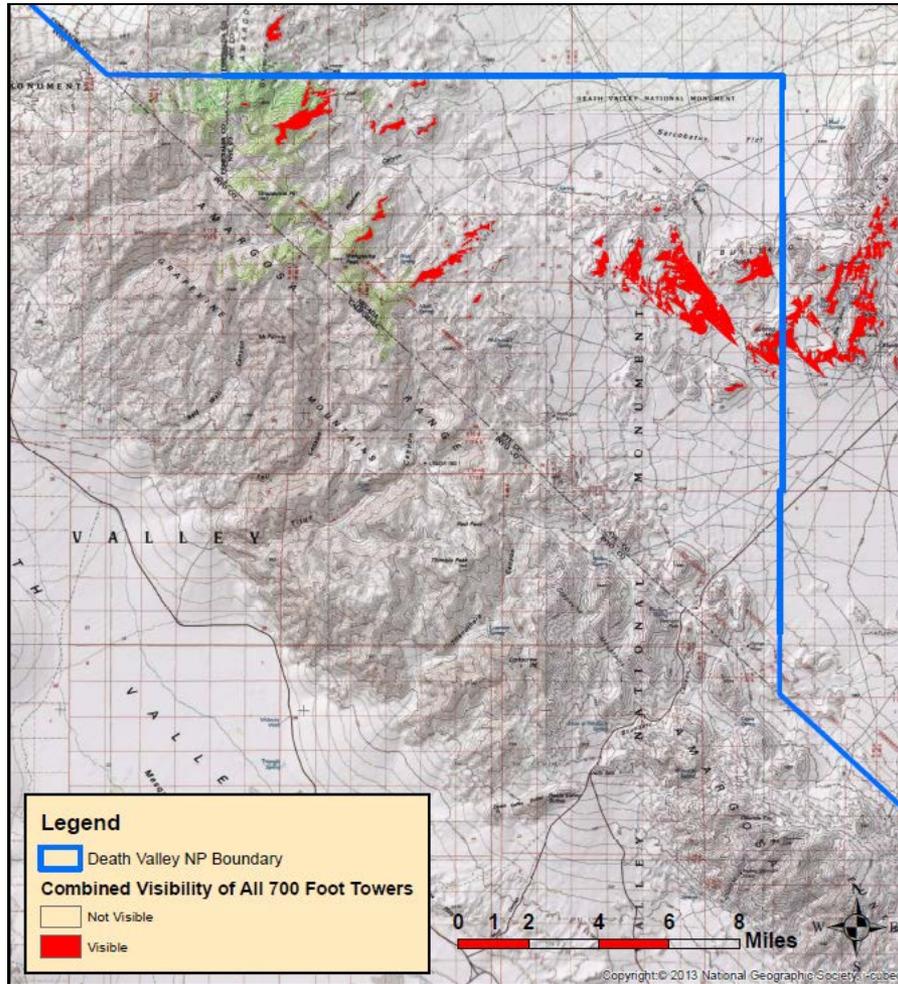


Figure 14. Preliminary viewshed analysis for 700-foot solar power towers in a proposed tower location in the Hidden Hills Development Focus Area, as visible to Death Valley National Park visitors .