## Energy - Docket Optical System

**From:** nanwestchester@hotmail.com
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**To:** Energy - Docket Optical System
**Subject:** DRECP NEPA-CEQA Comment

California Energy Commission
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Dear DRECP Action Team,

Please accept these comments as part of the public comment period for the Draft Desert Renewable Energy Conservation Plan and Draft Environmental Impact Statement. I value the California desert for its rich natural heritage, wilderness landscapes, and outstanding opportunities for recreation, while also recognizing the importance of increasing the proportion of our energy use from renewable sources, such as solar, wind, and geothermal.

One of the goals of the DRECP is to guide future renewable energy development toward places that have been previously degraded or provide very little ecological or cultural value. Despite this goal, the preferred alternative contains several landscapes currently identified as Development Focus Areas or Special Analysis Areas that should be removed from any development footprint and included in the conservation reserve system, either as National Conservation Lands or Areas of Critical Environmental Concern. I urge your agencies to conserve, rather than identify for development, the areas below:

- All areas that have been identified as Lands with Wilderness Characteristics by either the BLM or citizen organizations. These special places have been documented for their natural features and outstanding opportunities for solitude and primitive recreation.

- The Silurian Valley, where the majestic Avawatz Mountains and Kingston Range reside, are intact wild places where solar development should not be located. In the preferred alternative, a Special Analysis Area is located wholly within the proposed National Conservation Lands and overlaps with lands identified for their wilderness characteristics. The final DRECP plan should remove the Special Analysis Area here and add these public lands to the conservation reserve area.

- The public lands adjacent to the Big Maria Mountains Wilderness Area are prime Sonoran Desert wildlands that host a healthy bighorn sheep herd, although these lands are also slated as a Development Focus Area in the preferred alternative in the south and west. These places have outstanding wilderness characteristics and wholly compliment the rugged, natural values of the designated wilderness. I urge the agencies to remove the portions of the Development Focus Areas here that abut the designated wilderness and/or conflict with lands otherwise identified for their wilderness characteristics.

- The northwestern bajada of the Mule Mountains has been identified as having lands with wilderness characteristics, though it is proposed as a development focus area in the preferred alternative. While much of this development area may be appropriate, I urge the agencies to remove the portions that overlap with citizen-identified lands with wilderness characteristics.

- The Iron Mountains and Cadiz Valley of the California desert is the largest remaining unprotected roadless area in our state, though only half of this area is proposed for National Conservation Lands. The southern portion of this area is part and parcel of the northern portion and should be equally managed as National Conservation Lands.

In addition to ensuring that the above areas are removed from potential future development areas, I also urge the agency to maximize the reach of the National Conservation Lands and Area of Critical Environmental Concern footprint by including areas identified as lands with wilderness characteristics. Currently, the preferred alternative leaves at least 110,000 acres of citizen-identified wilderness lands out of the conservation reserve network. Particularly, the Sacramento Mountains and Bristol Lake areas are either undesignated for conservation or identified as Future Assessment Areas.

I appreciate this opportunity to comment on the draft documents and look forward to seeing the Desert Renewable Conservation Plan further improve its minimization of conflicts between future energy development and the conservation of our remaining wilderness heritage. Thank you.

Sincerely,

Nancy Amodeo
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