

**DOCKETED**

**09-RENEW EO-1**

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January 15, 2014

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David Harlow  
DRECP Director  
California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)

RE: December, 2012 Draft DRECP & National Conservation  
Lands

Dear Mr. Kenna and Mr. Harlow:

On behalf of the Amargosa Conservancy, I appreciate the opportunity to offer comments on the Draft Desert Renewable Energy Conservation Plan (DRECP) and specifically on which areas in the desert will be designated as National Conservation Lands. The Amargosa Conservancy is a non-profit community-based organization whose mission is to protect the land, water and beauty of the Amargosa.

Under the 'Description and Comparative Evaluation of Draft DRECP Alternatives,' we support "Alternative 5 - Maximum National Conservation Lands" because this alternative is based on the premise that all lands in the California Desert have been determined by Congress to be nationally significant and lands not focused on development or other intensive uses should be included as National Conservation Lands.

We would especially like to see the following areas protected as National Conservation Lands:

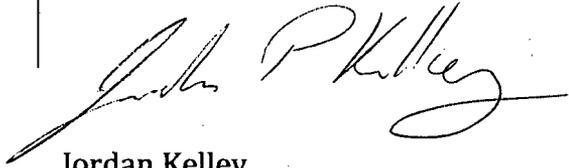
1.) Silurian Valley located along Highway 127 between Baker, CA and Tecopa, CA. This area has historical (Old Spanish Trail) and biological significance (habitat) and is also used regularly for videography. This place is unique and special because it has not yet been degraded by development; the vast unencumbered landscape has great beauty and holds important value for many stakeholders. More specifically, solar companies would like to focus development on the Silurian Valley because it is large, accessible, and close to a transmission corridor. It should be noted that large undeveloped valleys such as Silurian are one of the most endangered landscapes in America and once gone, it is forever. We owe it to future generations to preserve these open areas to the greatest extent possible. This is also the gateway to Death Valley National Park and is a key part of the visitor experience if they approach from the south. Driving through a valley filled with solar panels or giant wind turbines as one enters Death Valley completely changes the experience. It is important to also note that Death Valley is a world-class tourist attraction and a major international tourist destination. We need to protect it and the areas surrounding it. The Silurian Mountains should also be included in this protection designation.

In the areas around Shoshone and Tecopa there are springs, wetlands, fossil records, petroglyphs, early man sites and miners camps dug into the rock along the Spanish trail which all weave a rich history. They have significant historic and cultural value as well as biological resources that are vital to the health and welfare of the community. Ecotourism is the most important economic driver for these small disadvantaged desert communities and there is a potential to secure those resources for this area in California.

This area of California is a prime place for further study and conservation. The region has had limited development but this is why we have such an opportunity to keep it protected, because it has not been degraded. It is providing us with a valuable opportunity to do significant scientific work and create precedents for future endeavors. I urge you to keep in mind that while solar developers want this land they have no investment like the people that visit and live here. Developers will cite jobs for the community as a benefit to development, however we all know that those jobs are very limited after construction is over, and on average there are less than 10 fulltime positions at a solar facility. This development would irreversibly degrade the ecotourism for the communities that need it to survive, as this is their primary economic driver.

Thank you for this opportunity to provide input into the DRECP and in particular on which areas in the desert will be designated as National Conservation Lands. We appreciate the time and resources you devote to seriously considering the impact that conservation could have for future generations and the many benefits it would secure for the communities and wild spaces of California.

Sincerely,

A handwritten signature in black ink, appearing to read "Jordan P. Kelley". The signature is written in a cursive style with a long horizontal flourish extending to the right.

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