

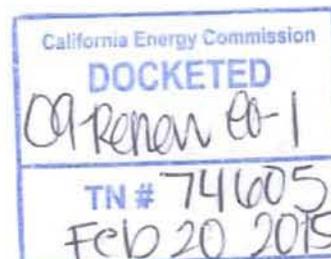


Poppy Reserve/ Mojave Desert Interpretive Association
(PR/MDIA)

Post Office Box 1408, Lancaster, California 93584
www.prmdia.org

DATE: February 19, 2015

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



FROM: Poppy Reserve/ Mojave Desert Interpretive Association

President Margaret Rhyne, PR/MDIA, PO Box 1408, Lancaster CA 93584

Red Rock Canyon Interpretive Association

President Carolyn Neipris-Jones, RRCIA, PO Box 848, Ridgecrest CA 93556

Friends of the Antelope Valley Indian Museum

President Don Borchers, FAVIM, P.O. Box 1117, Lancaster, CA 93584

RE: DRECP NEPA/CEQA (Sent via email and U.S. mail)

The three California State Park Non-Profit Cooperating Associations listed above jointly submit the following regarding the DRECP NEPA/CEQA documents. Together these organizations represent more than 90 years of support for California State Parks in the Mojave Desert.

The Poppy Reserve/ Mojave Desert Interpretive Association (PR/MDIA) is a non-profit cooperating association supporting five state parks: the Antelope Valley California Poppy Reserve, Ripley Desert Woodland State Park, Saddleback Butte State Park, Tomo-Kahni Historic Park and Providence Mountains State Recreation Area, home of Mitchell Caverns State Preserve.

Friends of the Antelope Valley Indian Museum (FAVIM) is the cooperating association for the Antelope Valley Indian Museum State Historic Park. Red Rock Canyon Interpretive Association (RRCIA) supports Red Rock Canyon State Park. All of these organizations trace their history back to the local residents who were the driving force behind the formation of the desert parks that they serve.

The Antelope Valley California Poppy Reserve State Park was created due to the efforts of the Lancaster Women's Club. Founding members of PR/MDIA were the leaders of the Lancaster Women's Club Wildflower Committee who were foremost among the many Antelope Valley residents instrumental in the creation of the Antelope Valley California Poppy Reserve.

Red Rock Canyon Interpretive Association was formed in 1982. Founders of RRCIA included members of local Sierra Club Chapters in the Antelope Valley and Kern County who were active in the effort to create the park as it is today.

The Antelope Valley Indian Museum became a state park due to the efforts of the Antelope Valley Branch of the American Association of University Women. The first museum docents were members of this organization. The Friends of the Antelope Valley Indian Museum was formed by local residents to continue the work begun by these first museum volunteers.

Sincerely,

Margaret Rhyne (m.rhyne@verizon.net 661 609-7280)

On Behalf of:

Poppy Reserve /Mojave Desert Interpretive Association
Red Rock Canyon Interpretive Association
Friends of the Antelope Valley Indian Museum

**DRECP PREFERRED ALTERNATIVE POTENTIALLY DEVASTATING
FOR THE ANTELOPE VALLEY
AND CALIFORNIA DESERT STATE PARKS**

The importance of biological, recreational and visual resources in the Antelope Valley and nearby areas of the Western Mojave is recognized throughout the Desert Renewable Energy Conservation Plan (DRECP). However, the Designated Focus Areas (DFAs) recommended in the Preferred Alternative exist in a universe apart, as if those who created these DFAs never read any other portion of the DRECP including the Conservation Strategies, Biological Goals and Objectives, or chapters concerning Biological Resources, Visual Resources, or Outdoor Recreation; all of which emphasize the importance of these resources.

Also startling is the lack of protection written into the plan for the recreational viewshed of California State Parks in the plan area. The importance of viewshed protection for BLM lands is given a great deal of attention. However nothing in the plan provides the crucially needed protection for state park viewsheds or preserves the biological, recreational, cultural and historic treasures that they protect. In fact the recommended DFAs do exactly the opposite. Other concerns include:

Missing information:

- Labeling of Legally and Legislatively Protected Areas (LLPAs) including California State Parks is omitted from many important plan maps, preventing those reviewing these maps from becoming aware of impacts to California State Parks located in the plan area
- Conservation Planning Areas for non-Federal lands lack crucial implementation details
- Plan lacks adequate protection for tricolored blackbirds in Southern California and provides an incomplete list of tricolored blackbird habitat in the Western Antelope Valley

Flawed analysis:

- Areas on the floor of the West Antelope Valley identified for conservation are tiny, fragmented and disconnected from existing protected areas including state parks
- Regarding state parks, key points concerning invasive species and habitat fragmentation from the "Recommendations of the Independent Science Advisors" are ignored
- Audubon Globally Important Bird Area in the Western Antelope Valley is blanketed with DFAs

Alternative not given serious consideration:

- An alternative is available that would avoid unnecessary impacts to California Desert State Parks and the Irreplaceable biological treasures that they protect
- This alternative has not been given the serious consideration that it deserves

Conservation Strategies

DRECP documents assert that program Conservation Strategies "provides protection for recreation, cultural, scenic, wilderness and other natural resources values." (*DRECP.org, Fact Sheets, Conservation Strategy*). **For California Desert State Parks this goal has been ignored. Conservation strategies do not protect important resources intrinsic to these parks. In addition, the lack of implementation details for conservation areas on non-Federal land threatens only rapid industrialization for non-Federal desert lands in the Antelope Valley with no concurrent guarantee of an organized strategy to provide appropriate mitigation.**

This is particularly problematic in regard to the Antelope Valley California Poppy Reserve, the Antelope Valley Indian Museum State Historic Park, and Red Rock Canyon and Ripley Desert Woodland State Parks. In the DRECP, all are identified as Visual and Recreational Resources (*Table III.20-3 of Chapter 111.20 Visual Resources and Chapter III.18, Outdoor Recreation*). Regarding state parks in general, Chapter III.18 recognizes that "[California State Parks] preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources and creating opportunities for high-quality outdoor recreation.."

Yet, despite these assertions, placement of DFAs in the Preferred Alternative threatens severe adverse impacts to the biological diversity and high-quality outdoor recreation provided by these desert state parks that currently preserve some of the most valued natural and cultural resources in the California desert.

DFA's Border State Parks

DFA's proposed in the Preferred Alternative surround three sides of the Poppy Reserve; border significant boundaries of Red Rock Canyon State Park and Ripley Desert Woodland (which is also bisected by a DFA); and are targeted for the primary desert view from the Antelope Valley Indian Museum State Historic Park.

Placement of DFA's on three sides of the Poppy Reserve threatens destruction of connectivity for this state reserve with the San Gabriel Mountains and dramatically increases threats from invasive species. **However, it would be difficult for the public at large to be aware of these threats as this state park is not labeled on the Preferred Alternative DFA map. Labels for state parks are also missing from maps throughout DRECP documents including those illustrating Conservation Planning Areas, Audubon Important Bird Areas and Recreational Resources.** Only those very familiar with these parks can pick them out on maps showing DFA's and, particularly in regard to the Poppy Reserve, become justifiably alarmed. The following map showing the outline of the **Antelope Valley California Poppy Reserve and Ripley Desert Woodland** was created from the DRECP Gateway using *FIGURE II.3-1, Interagency Preferred Alternative map of the Draft DRECP and EIR/EIS, created August 2014.* DFA's are in pink.

Shapes of the state parks are shown on the map and indicated a LLPAs. However without labeling these with the park names the implications of DFA's adjacent to these areas is not apparent to the general public. **All state and national parks within the plan area must be named on all maps. Without labeling all LLPAs with names, the DRECP demonstrates a significant lack of transparency.**



Those very familiar with the parks, recognize **Ripley Desert Woodland** and the **Antelope Valley California Poppy Reserve** but without the park names that should be on this map but are missing, how could anyone else, hoping to make "substantive" comments, be expected know what they were looking at? Antelope Buttes, Fairmont Butte and Broad Canyon are labeled, but the state parks are not. Also mystifying is the DFA bisecting Ripley. Currently Lancaster Road does go through the park in that area but there is only enough room beside this two lane road for visitors to park between the road edge and the park fencing.

Antelope Valley California Poppy State Reserve

The remarkable natural views that are currently enjoyed by visitors to the Poppy Reserve are targeted with irreversible impacts by the recommended DFAs. Elsewhere in the DRECP these existing views are celebrated, further evidence of the disconnect between the different components of this massive document. This is an excerpt from Chapter III.18 *Outdoor Resources*, page 111.18-8, which describes the Poppy Reserve:

"Shaded picnic tables nearby [the interpretive center] are available on a first-come first-served basis year-round, with an interpretive display and a serene view over the valley to the San Gabriel Mountains." (Bolding added for emphasis).

It is precisely that "serene view" that is targeted for destruction in the Preferred Alternative by the designation as DFAs of the land between the southern border of the Reserve and the San Gabriel Mountains. Placement of DFAs in this area not only threatens views valued by park visitors but also imperils wildlife movement between the Reserve and the San Gabriel Mountains. The photos on this page show that serene view and connectivity now targeted for obliteration.



Left: Antelope Valley California Poppy Reserve, Tehachapi Vista Point, looking south toward the San Gabriel Mountains. This vista point is a short 1/4 mile walk from the Jane Pinheiro Interpretive Center. Green farmland shown in the mid-ground is designated as a DFA in the Preferred Alternative.

Right: Picnic area at the Antelope Valley California Poppy Reserve on Easter Sunday. Green strip is farmland now designated as a DFA in the Preferred Alternative as are the rolling hills just beyond and most of the area between the farmland and the Reserve. Mountains in the background are the San Gabriel Mountains.



Left: View from popular vista point on the eastside of the Reserve with a memorial bench. Lands beyond the orange poppies is designated as a DFA in the Preferred Alternative. Mountains in the background are the San Gabriels. There are **more than 30** memorial benches like this one in the park. **Because the park trails follow contours of the Antelope Buttes and are elevated above the surrounding lands, most of these benches look down on areas designated as DFAs in the Preferred Alternative.**

Ripley Desert Woodland State Park

This park protects the remnant Joshua Tree - California Juniper desert woodland that once covered much of the Western Antelope Valley.



Ripley Desert Woodland

Mountains in the background of these photos of Ripley Desert Woodland are the San Gabriels.



Left: Photo taken at Ripley looking north at the Tehachapi Mountains. Area in this viewshed on Ripley's northern border designated as a DFA in the Preferred Alternative.

A large portion of Ripley Desert Woodland is covered with a desert woodland. However the eastern portion of the park is open *California Annual and Perennial Grassland*. The main park trail traverses this open grassland which borders the DFA in the Preferred alternative as shown in the map below:

Ripley Desert Woodland

Portion of the park that is open *California Annual and Perennial Grassland*. Located on the east side of the park bordering the area designated as a DFA in the Preferred Alternative.

Poppy Reserve

(Map: DRECP Gateway using FIGURE II.3-1, Interagency Preferred Alternative map of the Draft DRECP and EIR/EIS, created August 2014 DFAs shown in pink)



Biological Resources: Poppy Reserve and Ripley Desert Woodland

Both the Poppy Reserve and Ripley Desert Woodland provide the only legally and legislatively guaranteed protection of the *Annual and Perennial Grassland Natural Community* in the Western Antelope Valley. This natural community provides habitat for two vegetation alliances characterized in the Recommendations of Independent Science Advisors for the California Desert Renewable Energy Conservation Plan (DRECP) as

“now limited and rapidly diminishing because of development: California poppy fields (Eschscholzia californica) and Joshua Tree Woodlands alliance (Yucca brevifolia alliance)” (page 16).

Antelope Valley poppy fields have indeed been “rapidly diminished” in just the last several years due to the construction of massive industrial solar installations. Large fields along West 110th Street south of Lancaster Road that were covered with poppies this past spring are now covered with solar panels. AV Solar Ranch I blankets areas along Avenue D once known for springtime poppy displays. Thankfully, those installations have not yet altered the viewshed of either the Poppy Reserve or Ripley Desert Woodland or been constructed close enough to jeopardize native plants and animals in these parks due to edge effects. However, as stated before, the DFAs designated in the DRECP Preferred Alternatives would reverse this trend and instead target areas adjacent to these state parks for energy development. This is a distinct threat to the parks’ biological resources as, **according to the Independent Science Advisors,**

“Development of renewable energy facilities and associated infrastructure is expected to contribute to the establishment and spread of weed species which are already a major threat to desert ecosystems. In addition Invasive plants have greatly increased incidence of fires in the planning area which are devastating native communities....” (page vi)

Science Advisor comments also warn against dangers of habitat fragmentation:

“Habitat fragmentation and impediments to wildlife movements are among the greatest threats to desert communities and species, and maximizing habitat connectivity is essential to climate change adaption.”

Designated DFAs in the Preferred Alternative target areas now connecting the Poppy Reserve to the San Gabriels, threatening the Reserve with fragmentation and biological isolation. DFAs recommended for the borders of the Poppy Reserve and Ripley threaten both parks with radically increased infestation of invasive species and increase fire danger, already a very real threat.



Photo shows results of 2010 fire at Desert Woodland State Park fueled by non-native grasses. Some Joshua Trees and California Junipers that were partially burned are recovering but many others are not.

Covered Species: Poppy Reserve and Ripley Desert Woodland

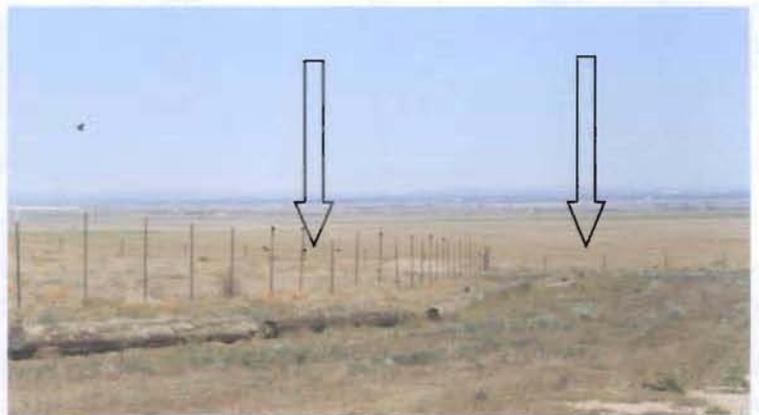
Both the Poppy Reserve and Ripley Desert Woodland provide the only legislatively guaranteed protection in the Western Antelope Valley *Annual and Perennial Grassland Natural Community* for burrowing owls, Swainson's hawk, mountain plover, and tricolored blackbirds. Ripley Desert Woodland provides potential nesting habitat for Swainson's hawk, tricolored blackbirds forage at the Poppy Reserve and burrowing owls nest and forage at the Reserve. The Poppy Reserve also provides suitable habitat for mountain plover known to exist west of Lancaster (DRECP III.7-156)

Burrowing Owls

In the last several years, state park personnel working in cooperation with the CDFW created artificial burrows for burrowing owls on the eastern portion of the Poppy Reserve. This was a successful effort as breeding pairs have indeed colonized these burrows. This habitat was created on the park's eastern edge to distance it from the park's public trails. The habitat was also created due to close proximity to foraging areas frequented by burrowing owls who prefer open space devoid of tall vegetation or other potential perching areas for predators. **DFAs are now designated next to the Poppy Reserve's eastern border within the foraging area of the owls who have taken up residence in the artificial burrows.**

Tricolored Blackbirds

Photos below show tricolored blackbirds, from nesting areas in nearby Fairmont Reservoir, foraging on the Poppy Reserve in 2011. Photo on the right was taken in the park's overflow parking area—tricolored blackbirds are perched on the fence. Arrows point to areas east of the Reserve designated as DFAs in the Preferred Alternative. (Please see page 10 for more about tricolored blackbirds)



The Poppy Reserve and Ripley Desert Woodland also provide the only protected lands in the Western Antelope Valley providing habitat for golden eagles, badgers, ground squirrels, mountain and western bluebirds, horned larks, meadowlarks, northern harriers, Le Conte's thrasher, prairie falcons, desert horned lizard, short-eared owl and many other species. Historically, the two parks provided desert tortoise habitat and foraging area for California condor.

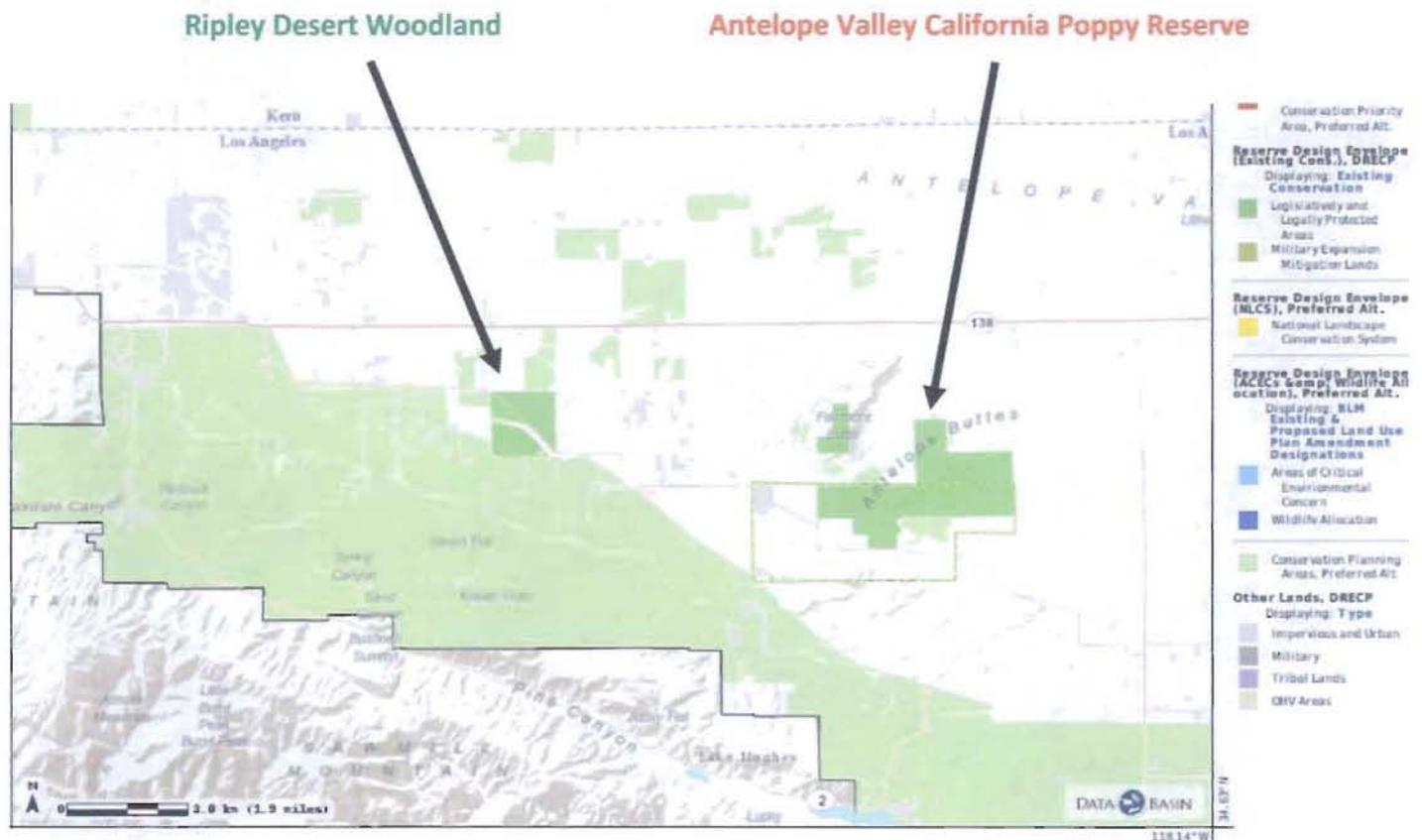
Further, the Antelope Valley California Poppy Reserve has special status as a **State Natural Reserve or SNR**. State Natural Reserves according to the official State Park website "have outstanding or unusual natural or scenic values" and "provide protection of native plant communities and wildlife in a natural landscape." The Poppy Reserve currently provides both "scenic values" and protection of "native plant communities and wildlife in a natural landscape." **These scenic values, natural landscape and wildlife protection are now imperiled by the DFAs designated in the Preferred Alternative.**

Conservation Planning Areas in the West Antelope Valley

Instead of designating DFAs adjacent to these state parks in the Western Antelope Valley, DRECP Conservation Areas should be created to protect these existing protected habits from the threats of fragmentation and further proliferation of non-native species. However, the Conservation Areas in the preferred alternative will not increase protection for the biological resources of the Poppy Reserve and Ripley Desert Woodland. They also do nothing to protect existing California poppy fields in the Western Antelope Valley outside of the Poppy Reserve; fields rapidly disappearing due to the construction of industrial energy facilities.

The map below shows Conservation Planning Areas designated for the Western Antelope Valley in the Preferred Alternative. **Note again, that labels identifying state parks have been omitted.** Land shown on the map designated as Conservation Planning Area is indeed worthy of preservation and mostly conforms to Significant Ecological Areas as designated by Los Angeles County. However these areas are not on the valley floor but are instead in areas of rolling hills. Conservation areas that could buffer the Poppy Reserve from the type of negative edge effects described by the Independent Science Advisors, protect connectivity to the San Gabriel Mountains or preserve its valued recreational viewshed are not included.

Small areas shown on the map as suggested for Conservation Planning Areas north of Ripley and the Poppy Reserve conform to the remnant Joshua Tree woodlands that still exist in the area, also L.A. County SEAs. However it is highly questionable if these areas will continue to be viable if fragmented by industrial solar installations as they too are surrounded by DFAs.



DRECP Biological Goals and Objectives

Biological Goals and Objectives for *Annual and Perennial Grassland Natural Community*, which cover the Western Antelope Valley state the following:

Obj. GRS1.2 Conserve California Annual Forb/Grass Vegetation (CAFG) where it occurs in the West Mojave and Eastern Slopes and Mojave and Silurian Valley subareas, including the following: Antelope Valley, Superior Valley

Obj. GRS1.3 Restore grassland natural communities in the Plan Area to ... Reduce the threat of invasive competitors

DFAs and Conservation Planning Areas in the Western Antelope Valley as currently designated in the Preferred alternative do not meet these goals. Placement of DFAs next to area state parks **increases** the threat of invasive competitors. Conservation Areas as currently designated in the Preferred Alternative do not **conserve** California Annual and Perennial Grassland in the Western Antelope Valley on the only lands where that habitat is currently legislatively protected.

Audubon Globally Important Bird Areas

The purpose of the Important Bird Area Program is to set "science-based" priorities for habitat conservation to "promote positive action to safeguard vital bird habitats." According to the Audubon's IBA website, "IBA inventories provide a scientifically defensible method for prioritizing conservation activities and allocating limited conservation dollars to ensure the maximum benefit to birds."

The IBA program has identified 424 areas in the entire world that are considered "Globally Important Bird Areas." **The entire Western Antelope Valley is one of these areas.** Chapter III.7 of the DRECP discusses the importance of IBAs:

III.7.5.3.6 Important Bird Areas in Plan Area

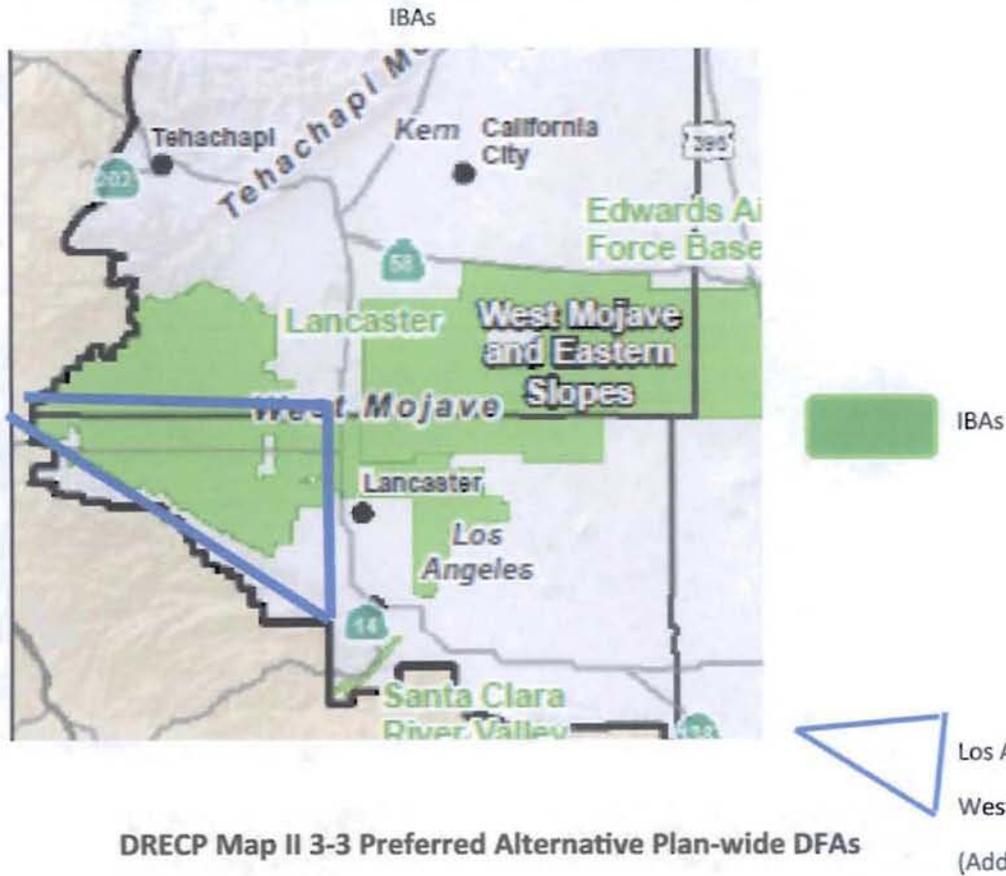
The National Audubon Society has identified Important Bird Areas throughout California that provide essential habitat for breeding, wintering, or migrating birds (National Audubon Society 2008). While these sites can vary in size, they are discrete areas noticeable within the surrounding landscapes. California Important Bird Areas are defined as biogeographically distinct subregions that meet at least one of the following criteria:

- *Support over 1% of the global or 10% of the California population of one or more sensitive species (breeding or wintering).*
- *Support at least 10 sensitive species (federally or state-listed threatened or endangered species as well as California Species of Special Concern).*
- *Support 10,000 or more shorebirds that can be observed in one day.*
- *Support 5,000 or more waterfowl that can be observed in one day.*

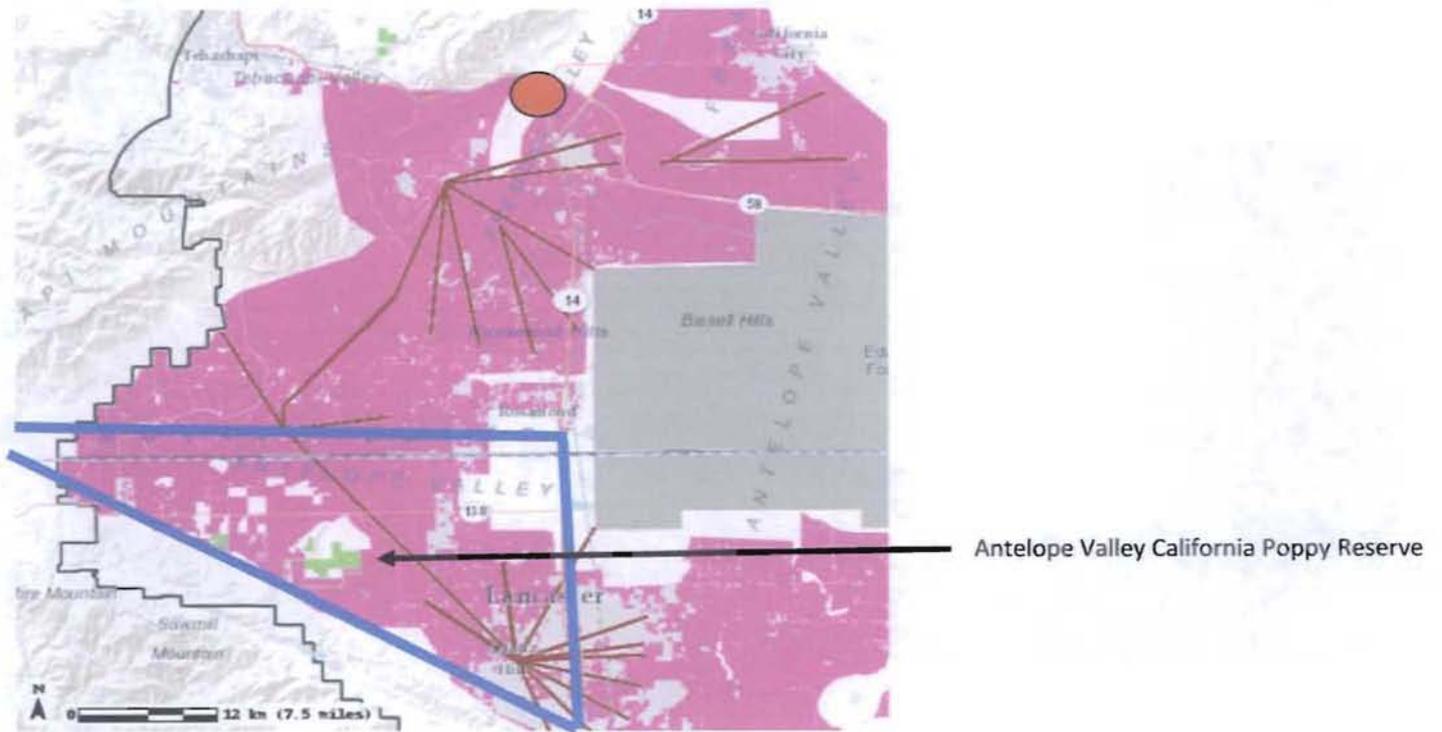
Table III.7-22 lists the Antelope Valley as an Important Bird Area and identifies it as an area with a P/L designation meaning that it has 10 or more sensitive species and "more than 10%/1% of the global population of one or more sensitive taxa."

Given that information, it is again unacceptable that in regard to the West Antelope Valley, the Antelope Valley California Poppy Reserve, the largest area providing protection for bird species, has been surrounded with DFAs instead of Conservation Areas. **Instead the IBA in the western Antelope Valley has been blanket-ed with areas designated as DFAs as shown on the maps on the following page.** Again, labels for state parks are missing from these maps. (Blue lines added for clarification.)

Audubon Important Bird Areas DRECP Figure III.7-15



DRECP Map II 3-3 Preferred Alternative Plan-wide DFAs



Tricolored Blackbird Habitat in the Western Antelope Valley

The importance of the Antelope Valley IBA is illustrated by the U.C. Davis Blackbird Portal which disseminates information from the Tricolored Blackbird Study Group. This website lists 9 areas in Southern California where breeding colonies of this native species, now in serious decline, may be seen. Four of those sites are in the Western Antelope Valley: Holiday Lake, Fairmont Reservoir, Leona Valley, and Quail Lake. **Three of these, Holiday Lake, Fairmont Reservoir and Quail Lake are designated as DFAs in the preferred alternative or are surrounded by lands designated as DFAs; land that is currently used by foraging tricoloreds. Recognition of these nesting areas as well as a plan for their protection is missing from the DRECP.**

Due to the importance of the Western Antelope Valley as tricolored blackbird habitat, a species given emergency Endangered Status under the California Endangered Species Act just this past December, it is again remarkable that conservation planning areas have been excluded from three of the four areas where documented nesting occurs. It would seem clearly logical to include Fairmont Reservoir and the Poppy Reserve in a connected conservation planning area due to the documented foraging of nesting blackbirds from Fairmont on the Reserve which is again, the only legislatively protected foraging area for tricolors in the Western Antelope Valley. Instead much of this area is designated as a DFA. This is difficult to understand particularly as a CDFW report states that, "In Southern California the biggest threats are urbanization and **alternative energy development.**" (Antelope Valley Press, 2-4-2015 page A8)

Conservation Planning Areas on Non-Federal Lands

Appendix M, page M-2 states that "Approximately 2,714,000 acres in the DRECP Plan-Wide Reserve Design Envelope, which includes 1,080,000 acres of Conservation Planning Areas (CPAs) that identify non-Federal lands appropriate for permittee mitigation acquisition from willing sellers..."

We see no proposal for insuring that "permittee mitigation" will be acquired or mitigation directed appropriately. Currently, counties have sole authority over determining appropriate mitigation for renewable development. How can the DRECP supersede counties to guarantee that the 1,080,00 acres of Conservation Planning Areas on non-Federal lands will indeed be conserved? Will the DRECP be establishing its own planning department to take the place of county entities? Who will administer these proposed CPAs? We see no details in the plan to guarantee that any conservation will occur on non-Federal lands. Instead, if the Preferred Alternative is adopted, it will target the Antelope Valley and other areas of extensive non-Federal lands in the program area for further industrialization without the means to balance that development with appropriate conservation.

Red Rock Canyon State Park



27,000 acre Red Rock Canyon State Park is one of the most beautiful and scientifically diverse landscapes in all of California. Its scenery is unique and unmistakable. Rare plants and animals abound within its hollows. Its intricate and fragile ecosystem attracts an impressive array of California, national and even international users.

Red Rock's scenic cliffs and desert vistas are also highly valued by those looking for outstanding scenery and have been used extensively as film locations. Many iconic movies have been filmed at Red Rock including *Flash Gordon*, *Buck Rogers*, *the Mummy*, *the Big Country* and *Jurassic Park*.

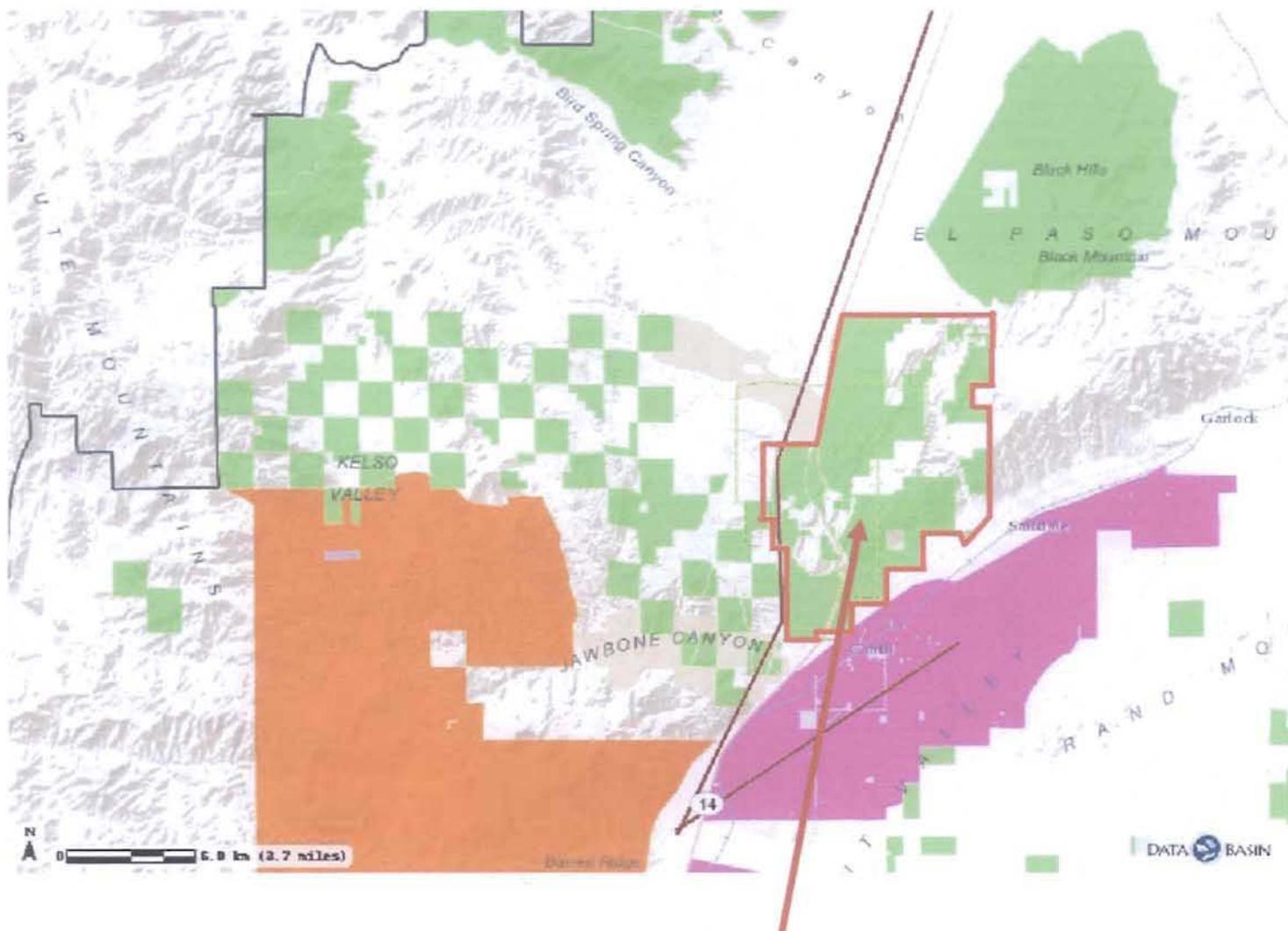
Covered Species

Red Rock Canyon provides the only extensive protected lands in the area for many **covered species** including Agassiz's desert tortoise, Mojave ground squirrel, pallid bats, Townshend's big-eared bat, Mojave fringe-toed lizard, burrowing owl, Swainson's hawk, and golden eagles. Species of special concern that occur in the park include long-eared owls, northern harriers and prairie falcons. In all 16 bat species are found in the park as are badgers and mountain lions. Desert kit foxes make their home at Red Rock; a species whose numbers are in decline due to rapid loss of habitat from desert industrial solar facilities. In 2011 and 2012, a local die-off of this species was documented due to an outbreak of distemper concentrated around the Genesis Solar site in Riverside County, a tragic indication of the unique threat to Red Rock's desert kit fox population that would be posed by industrial energy development.

We now see these iconic views and threatened species imperiled by a large DFA proposed in the Preferred Alternative for the southern border of the Red Rock Canyon. Again, it would be difficult for a member of the public to become aware of this threat as this park is not properly labeled on DRECP maps. The approximate location of the park is indicated by the red lines added for purposes of clarification to the Preferred Alternative DFA map shown on the next page. It should be emphasized that red lines added to show the location of Red Rock Canyon State Park are not part of the original DRECP map.

The pattern we see throughout the DRECP of the lack of labeling for California Desert State Parks is again repeated for Red Rock. It is mystifying that important landmarks such as Jawbone Canyon, Kelso Valley and the Black Hills all appear on the DRECP map shown on the following page **but Red Rock Canyon State Park does not!** It is impossible for the public to make "substantive" comments concerning the Preferred Alternative without proper and complete maps; **the lack of such maps is an inexcusable omission.**

This is a serious problem for Red Rock Canyon State Park and the many threatened species that it protects. These species are of particular concern as Red Rock already experiences encroachment from off-road areas on its eastern and western borders. These areas exacerbate threats to desert tortoise, desert kit fox and golden eagles and other vulnerable desert dwellers susceptible to human disturbance and subsidized predators. Targeting the park's southern border for industrial development further imperils these species. In addition, industrial energy development on Red Rock's southern border will damage the park's desert vistas so valued by both visitors and the film industry.



Red Rock Canyon State Park

The location of the Red Rock Canyon State Park is indicated by the red lines added for purposes of clarification (and to the best of our ability) to the Preferred Alternative DFA map shown above—these lines are not part of the original DRECP map.

A larger scale version of this map does label Red Rock, however once a user zooms in on the area, that name disappears although others remain.

Why are many landmarks such as Kelso Valley, Jawbone Canyon and Black Mountain included on this map but nothing included to indicate the location of Red Rock Canyon State Park? How can the public make informed comments without this information?

Antelope Valley Indian Museum

Howard Arden Edwards, a self-taught artist, became enchanted with the desert scenery of the Antelope Valley. He homesteaded 160 acres on Piute Butte and in 1928, Edwards, his wife and teenage son began building a home, which included a special area he called his Antelope Valley Indian Research Museum. Later, Grace Wilcox Oliver, who had taken some courses in anthropology, purchased the property, reinforced the main building, expanded the physical facilities, and added her own artifacts. She opened the Edwards' house as the Antelope Valley Indian Museum in the early 1940s and operated it intermittently for the next three decades, gradually adding to the collections.

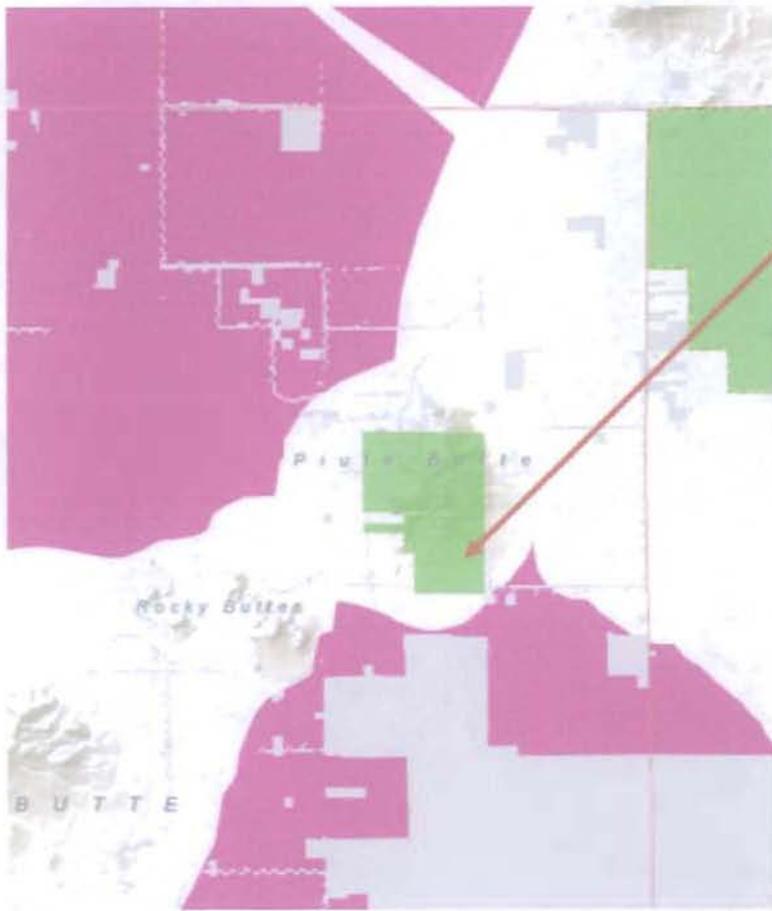


Beginning in the 1960s, Antelope Valley residents, led by local chapter of the American Association of University Women, began to work to protect this eclectic museum and its scenic location on Piute Butte. The museum and its surroundings on Piute Butte were purchased by the state in 1979 and became a California State Historic Park in the 1980s.

Both exteriors and interiors of the museum are distinctly intriguing. Outside, the museum's "Swiss Chalet" architecture is decorated with desert symbols and landscaped with native plants. Inside, unique room arrangements feature use of natural boulders and house a fascinating and eclectic mix of priceless cultural artifacts from many groups of First Americans.

Much valued by both the creators of the property and present day visitors is the unique setting of the Antelope Valley Indian Museum. The museum and other historic cottages on the property (once used as a guest ranch) are nestled among the boulders of Piute Butte. Elevated above the surrounding desert, the park grounds feature views across the valley floor to the San Gabriel Mountains. A scenic nature trail allows visitors to explore Piute Butte and enjoy the desert views. The museum's picnic area, where school children participate in hands-on activities facilitated by the park's staff and volunteers, features views of the museum grounds and Piute Butte on the north and expansive desert and mountain views to the south.

DFAs designated in the DRECP Preferred Alternative threaten destruction of this expansive viewscape by targeting areas that are currently predominantly open desert with industrial energy installations. **Museum visitors would be looking down on these solar installations from the park's trails and picnic area.** The map on the following page shows DFAs proposed for the Indian Museum's primary viewshed.



Antelope Valley Indian Museum

Following the pattern of excluding labeling for California State Parks from DRECP maps, Piute Butte is shown on the Preferred Alternative map, but the Antelope Valley Indian Museum, represented by the green area with Piute Butte on the north, is not labeled. DFAs shown in pink south of the park are in the primary viewshed of the park looking south across the desert to the San Gabriel Mountains from the park's nature trail, picnic area and the front patio of the museum building.

Conclusions and Recommendations

- DRECP maps should name clearly all LLPAs within the plan area. The lack of these labels calls into question the validity of the efforts that have been made to fully inform the public of the probable impacts of the Preferred Alternative on important desert resources. Maps must be correctly labeled, the public fully informed of changes and the comment period extended so that a fully informed review may take place.
- DFAs on non-Federal Lands should not be designated without a concurrent, fully detailed and fully realized plan for Conservation Planning Areas on non-Federal Lands.
- Audubon Important Bird Areas should not be blanketed with DFAs without regard to essential habitat. DFAs should not threaten biological and recreational resources of LLPAs. We recommend the following three changes to DFAs:
 1. Eliminate DFAs in the Western Antelope Valley from all areas west of 110th Street West and south of Avenue D
 2. Eliminate DFA south of the Antelope Valley Indian Museum.
 3. Eliminate DFA south and southeast of Red Rock Canyon State Park.
- Conservation Planning Areas in the Western Antelope Valley must provide for protection of tricolored blackbird habitat. Conservation Planning Areas in IBAs should be adjacent to existing LLPAs and protect biological and recreational resources and connectivity for these protected areas. To accomplish this, we suggest the following two additional conservation areas:
 1. Conservation Planning Area should be created around Holiday Lake.
 2. Conservation Planning Area should extend one mile east and west of the Antelope Valley California Poppy Reserve and north to Avenue D. The area should continue south from the Reserve along 170th and 130th Streets West to the California Aqueduct and include Fairmont Reservoir. This area would protect the Poppy Reserve while at the same time provide protection for tricolored blackbird habitat. It would provide connectivity for the Poppy Reserve with the Angeles National Forest on the south and three areas held by private conservancies on the north.
- An alternative should be considered that eliminates the need for extensive DFAs. This alternative in combination with reduced DFAs and improved Conservation Planning Areas as suggested above, will reduce the threats to LLPAs and other important wildlife habitats. **That alternative exists:**
- We strongly support the position stated by the Basin and Range Watch in their letter of January 31, 2015, *Subject: New Desert Renewable Energy Conservation Plan Alternative*. This letter describes how we can “transition the state’s electrical systems to clean power in the fastest and least harmful way and permanently conserve our intact, carbon-sequestering desert wildlands.” This alternative would achieve carbon reduction goals without sacrificing California State Parks and the valuable scenic, recreational and biological treasures that they protect. Letter available online: <http://basinandrangewatch.org/DRECP-CEESP-Alternative.html>