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California Energy Commission

**DOCKETED**

**09-RENEW EO-1**

TN # 74756

FEB 20 2015

February 20, 2015

RE: DRECP comments

To whom it may concern:

Friends of Juniper Flats is a non-profit organization comprised of concerned individuals who have been working together with the BLM for over ten years to help preserve, protect, and restore the natural and cultural values of the Juniper Flats, Arrastre Canyon, and Grapevine Canyon areas for future generations.

Our 300+ members and many others visit the public lands in and around the Juniper Flats Area to get away from the hustle and bustle of the valley below and to enjoy the scenery and wildlife. Visitors enjoy hiking, nature appreciation, bird watching, desert wildflowers, mountain biking, and scenic vehicle touring along open routes. The area is in close proximity to most residents of the Victor and Lucerne Valleys – a twenty-minute drive or less, providing them easy access to a scenic and natural setting. Because of the uneven terrain, and granite outcroppings, visitors can find a secluded and quiet experience in the Juniper Sub Region (aka Juniper Flats Area).

We thank you for the opportunity to comment on this huge document. Our comments are limited to a few issues we find with the DRECP as it is presented.

1) The DRECP document has been in the making for over 6 years and utilizes an outdated assumption that most of our future energy needs must come from central power plants. In the past, our energy needs have been met by such centralized plants, however, renewable energy advances show that a smarter, less destructive and less expensive way to get the energy is via distributed renewable energy generated at the point of use. During the past decade significant advances have been made in distributed generation which makes use of electricity generated at the point of use. This new model, along with advances in energy storage, is becoming more popular and successful, has the potential to make expensive large industrial scale renewable projects (that destroy the desert) **obsolete in a few years**. Please do not make the mistake of allowing unnecessary destruction of our desert ecosystems. Expensive transmission lines needed for the industrial scale projects may also become obsolete. The “purpose and need” in the DRECP does not adequately address this fast growing alternative which is less expensive and far less destructive. In other words, the NEED as stated has changed. Even some of the mandates mentioned in the document have already been met ahead of the timeframe given. The purpose and need must be revised accordingly.

2) To make substantive comments on the DRECP while the WEMO revision has not yet been made public is impossible. The two plans overlap and the public must have an opportunity to look at them together. One cannot be independent of the other. There are substantial land use changes within the DRECP which amend the CDCA plan that must also be studied and not conflict with the WEMO

plan. The cumulative impacts of power lines, industrial scale solar/wind energy plants, and vehicle access must be analyzed along with all the other impacts to the Mojave Desert. Transmission line roads and the land surrounding them are becoming destroyed with irresponsible off-road shortcuts and a proliferation of new user created routes into sensitive habitat. We request that you extend the comment period to provide an additional 90 days AFTER the WEMO revision has been made public and the deadlines must be same.

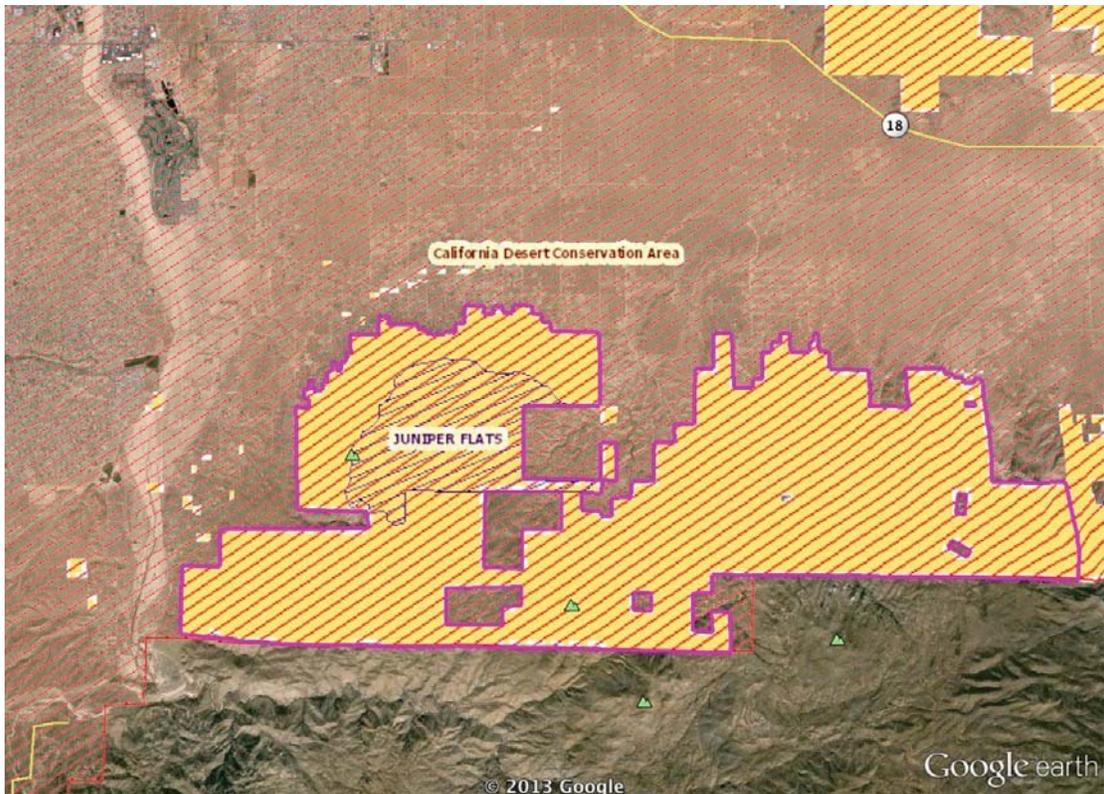
3) The Friends of Juniper Flats request that the Juniper Flats Area and Granite Mountains be included in the National Landscape Conservation System lands as set out in our letter of 10-18-13. These lands are a national treasure. We also add the need to include the far eastern portion of the Juniper Flats Area, not previously in our description below:

Friends of Juniper Flats request that the Desert Renewable Energy Conservation Plan (DRECP) process include the areas of Juniper Sub Region and Granite Mountains as National Landscape Conservation System lands (Figures 1 and 2). Both areas offer unique values for recreation and wildlife, and require extra attention as a result of the increasing population in the Victor and Lucerne Valleys. Expected population growth means that there will be more users of public lands seeking open space, which increases the burden on the wildlife habitat. Industrial-scale energy development in the Juniper Flats Area would negatively impact the natural character and feeling of the landscape, and deprive residents of substantial recreation opportunities.

The Juniper Flats Area serves as a transition zone from the higher elevation evergreen forest on National Forest Service lands to the south, and creosote and yucca habitat at lower elevations to the north, offering habitat connectivity for wildlife through the Lucerne Valley and along the Mojave River. The Juniper Flats Area contains numerous springs and seeps as well as a few year round streams which support a diverse array of flora and fauna. The riparian communities which occur near these desert springs and along flowing streams are of special interest. Under the CDCA Plan all riparian areas in the Planning Area are designated as Unusual Plant Assemblages (UPAs), which are to be given special consideration in management decisions.

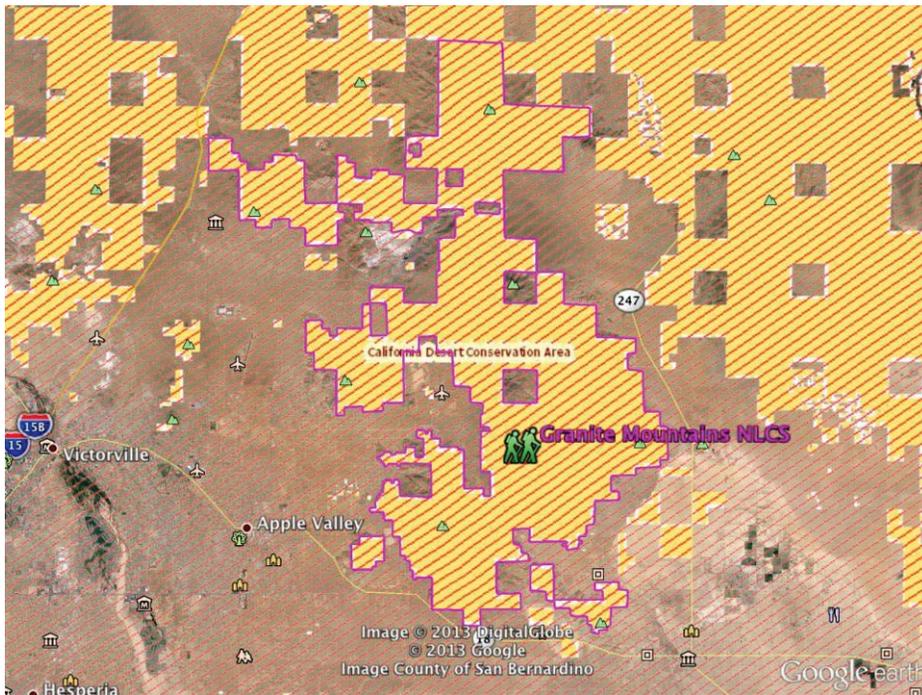
Several unusual plant species rely on the limestone outcroppings that dot the area. Plant communities within the Juniper Sub Region include Mojave Desert Creosote Scrub, Joshua Tree Woodland, Cottonwood and Willow Riparian Woodland, Juniper Woodland, Grasslands and Pinyon-oak Woodland. These habitat types are under siege elsewhere in the western Mojave as a result of urban development, mining, transportation, and energy projects. Much of this habitat type in the western Mojave is also under private or other non-federal jurisdiction.

A portion of the area is designated as an Area of Critical Environmental Concern, with several important archaeological sites. The area has long been used by people for hunting and gathering and includes the route taken by the last remaining Native Americans in California who were killed at the Battle of Chimney Rock near Lucerne Valley on February 16, 1867. Today, Coxe Truck Trail is a popular scenic backcountry road that runs through the Juniper Flats Area. This historic road was built in the late 1800s to connect the gold mines in the Big Bear area with the town of Victor. Remains of numerous historical gold mining efforts dot the area, and several historic ranches are still occupied today. Just along the southern boundary in the San Bernardino National Forest lies Deep Creek. This wild trout stream is proposed as a Wild and Scenic River and the valley also contains archaeological sites, the Pacific Crest National Scenic Trail and world renowned Deep Creek Hot Springs. The National Conservation Land status would reveal and protect our cultural legacy, safeguard cultural sites, and preserve the remaining traces of important historic trails and pathways. The Juniper Flats Area is part of a larger landscape in need of protection.



(Figure 1) The proposed Juniper Flats NLCS designation outlined in magenta, BLM lands in yellow.

Friends of Juniper Flats also support National Conservation Lands status for the Granite Mountain area between Apple Valley and Lucerne Valley. The Granite Mountains are host to the rare and endemic Ford's Indra Swallowtail butterfly that depends on its host plant, *Cymopterus panamintensis*.



(Figure 2) Proposed NLCS lands in the vicinity of Granite Mountain. BLM land in yellow, and area of interest outlined in magenta.

The mission of the Friends of Juniper Flats is to preserve, protect, and restore the natural and cultural values of the Juniper Flats, Arrastre Canyon, and Grapevine Canyon areas.

At least 13 golden eagles are also active in the Granite Mountain area, according to surveys completed for the now-withdrawn Granite Mountain wind energy application, and at least one active nest is located nearby. Bendire's thrasher, Townsend's big-eared and pallid bats are also found in the Granite Mountains. Together with conservation of the Juniper Flats Area, the Granite Mountain area could provide a desert wildlife connectivity corridor to the Ord-Rodman Desert Wildlife Management Area (DWMA), and the Fremont-Kramer DWMA, providing incentive for conservation of private lands in the intervening lower elevation areas between Juniper Sub Region and Granite Mountain.

The Granite Mountains also serve as a recreation area for residents of the Victor and Lucerne Valleys for hiking, horseback riding, rock climbing, hunting and vehicle touring on Johnson Road.

Friends of Juniper Flats offer these specific suggestions for DRECP agencies' consideration, but support wide application of National Conservation Land status to all public lands in the California Desert District to protect wildlife and future generations' access to mostly undisturbed wildlands.

Inclusion of these areas in the National Conservation Lands System would provide a living classroom to promote environmental literacy, training and career pathways for young area residents. It would also promote community awareness and partnerships with other federal and state agencies to support common environmental goals.

We are grateful that the BLM is designating areas of the California Desert as Conservation Lands and we urge you to include these specific areas for their pre-historic, historic values as well as their natural beauty and precious ecosystems.

Sincerely,

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