



State of California • Natural Resources Agency
DEPARTMENT OF PARKS AND RECREATION
P.O. Box 942896 • Sacramento, CA 94296-0001

Edmund G. Brown Jr., Governor
Lisa Ann L. Mangat, Acting Director

February 23, 2015
Renewable Energy Action Team Agencies (REAT):

California Energy Commission
California Department of Wildlife
Bureau of Land Management
U.S. Fish and Wildlife Service

California Energy Commission
DOCKETED
09-RENEW EO-1
TN # 75300
FEB 23 2015

c/o:

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

Re: Comments on the draft Desert Renewable Energy Conservation Plan and
EIR/EIS, Docket No. 09-RENEW EO-01

Dear Commissioner Douglas, Deputy Director Hunting, Director Kenna, and Regional
Director Lohofener,

California Department of Parks and Recreation (State Parks), appreciates the
opportunity to comment on the Draft Desert Renewable Energy Conservation Plan
(DRECP) and EIR/EIS.

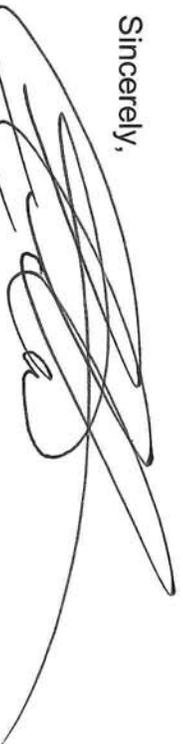
State Parks is a State Agency as defined by the California Environmental Quality Act
(CEQA) § 21082.1, a Trustee Agency as used by CEQA, its Guidelines and as defined
by CCR § 15386 for the resources affected by the Draft DRECP EIR/EIS proposed
project. State Parks mission is to provide for the health, inspiration, and education of
the people of California by helping preserve the state's extraordinary biodiversity,
protecting its most valued natural and cultural resources, and creating opportunities for
high quality outdoor recreation.

State Parks would like to acknowledge the collaborative efforts of the REAT Agencies
along with the numerous other cooperating entities involved in bringing forth the Draft
DRECP EIR/EIS document for review and comment. We commend the REAT agencies
on their landscape-scale approach to this effort of planning not only for streamlined
renewable energy development, but also for the conservation of the ~22.5 million acre
DRECP area as well.

State Parks understands that when the DRECP is implemented it will help contribute towards California's ambitious energy and greenhouse gas reduction goals associated with AB 32 and SB X2.

After review from State Parks staff, including the Office of Historic Preservation, we put forth the following comments and suggestions for your consideration as you take the next steps in developing the Final EIR/EIS. We look forward to continuing the discussions and collaboration, and please don't hesitate to contact me at Christopher.conlin@parks.ca.gov, or Connie Latham at Connie.latham@parks.ca.gov or 916-651-8695 if you have any questions.

Sincerely,



Col Christopher C. Conlin, USMC (Ret)
Deputy Director
California State Parks & Recreation

Enclosure:

cc: Aaron Robertson, Chief Deputy Director, DPR
Carol Roland-Nawi, SHPO
Jay Chamberlin, Chief, Natural Resources Division
Steve Lehman, Deputy Director, Park Operations
Vicky Waters, Deputy Director, Public Affairs
Dan Falat, Colorado Desert District Superintendent
Garratt Aitchison, Ocotillo Wells District Superintendent
Kathy Weatherman, Tehachapi and San Andreas Districts Superintendent
Connie Latham, DRECP/RE Project Coordinator, DPR

California State Parks comments on the Draft DRECP EIR/EIS

California State Parks represent a tremendous public investment in the protection and preservation of both cultural and natural resources along with the recreational and educational value they provide. As the governmental entity responsible for the stewardship of twelve State Parks within the DRECP planning area, we have a strong interest in ensuring parks involvement in any proposed alterations of land use adjacent to State Parks. The long-term health of these units is dependent on the health of the area's ecosystems, and recognizing the biotic boundaries of State Parks extend beyond its jurisdictional boundaries and must be managed with an eye towards landscape and regional concerns.

State Parks supports the REAT Agencies conservation vision and landscape-scale approach for planning energy siting in the California Desert. After review by staff and environmental specialists, State Parks believes the best protection for park resources and values is by creating an action alternative for the Final EIS/EIR (FEIR/EIS) and Record of Decision that is a combination of the preferred alternative and alternative one presented in the Draft DRECP EIR/EIS. State Parks recommends that the REAT Agencies work directly, where appropriate, with park staff regarding the below recommendations to the draft document for inclusion in the Final DRECP EIR/EIS.

1. DRECP Implementation Plan/Structure:

State Parks would like to reaffirm our appreciation for our current involvement with the Renewable Energy Policy Group, and, the REAT Managers Group which we understand will transition to make up a component of the DRECP Coordination Group.

One of Parks key recommendations for the FEIR/EIS is providing more specificity associated with the components, roles, and leadership that will make up the DRECP Coordination Group, along with how on-going collaboration will occur with those entities that make up the proposed Public Agency Working Group. We recommend the FEIR/EIS provide more detail regarding the actual process associated with the administrative and decision making roles under the DRECP Coordination Group as well.

Under the proposed implementation structure/plan, State Parks would be part of the Public Agency Working Group for which the DRECP Coordination Group would collaborate with by allowing for "input or recommendations" on the implementation of the DRECP.

State Parks recommends changes to the Implementation Plan that allows for cooperating agency coordination and consultation at the pre-application/siting phase when a project has the potential to directly or indirectly affect Park resources, including impacts to lands directly adjacent to parks. The DRECP does not affect existing management practices within State Parks as a Legally and Legislatively Protected Area (LLPA) designation within the DRECP, however, there is potential for direct and indirect

impacts associated with renewable energy siting near park boundaries that will need to be avoided or mitigated via consultation and coordination with State Parks as mentioned above. Through Parks collaborative participation in the Coordination Group we feel that these potential impacts can be addressed and mitigated.

Having an opportunity to collaborate early in the process, along with the sharing of digital resource data, inventories, as well as mitigation/avoidance recommendations, is crucial to ensuring State Parks existing resource management directives are considered, and not in conflict with, proposed renewable energy development or land use changes adjacent to park boundaries.

We recommend more specificity in the FEIR/EIS regarding how the decision making role, at the Coordination Group level, will take place regarding compensatory mitigation impacts and funding to LLPA lands bordering non-federal DFAs. The DRECP has a planning horizon of 25 years, and ensuring the durability of conservation is of high importance to environmental staff at State Parks.

State Parks has shown our commitment to the DRECP as a cooperating agency as well as supporting the renewable energy goals and greenhouse gas reductions policies of California. We would like to continue our good relations with the DRECP Executive Policy and Coordination Group knowing the benefits of collaborative efforts in a planning endeavor as large and complex as the DRECP will be beneficial for all entities involved.

II. DRECP Planning Components:

State Parks has had long standing cooperative working relationships with BLM, USFWS, and CDFW, who will ultimately approve the major components that make up the DRECP; BLM Land Use Plan Amendment (LUPA), DFW Natural Community Conservation Plan (NCCP), and USFWS General Conservation Plan (GCP).

Possible fragmentation of habitat and foraging linkages surrounding park boundaries is a key concern for State Parks. As mentioned above, by early collaboration and consultation with park staff/environmental specialists, many of these concerns can be avoided or mitigated.

Per the Draft DRECP EIR/EIS, the USFWS General Conservation Plan is the structure and process for streamlining permit decisions for Habitat Conservation Plans (HCP) associated with Incidental Take Permits (ITP) on non-federal lands that are “suitable” for the needs of the local area. The NCCP per the Draft DRECP EIR/EIS establishes a Plan-wide framework for ITP authorizations for covered activities. Further, the NCCP establishes Plan-wide programs intended to conserve Covered Species and natural communities at the ecosystem scale while accommodating covered activities and other compatible land uses. Environmental staff want to ensure that a proposed project specific HCPs and ITPs do not conflict with existing resource management practices and/or directives within State Parks. We recommend that the draft DRECP EIR/EIS add

more specificity in the FEIR/EIS as to how conservation on non-federal land within DFAs assures for this protection. The draft DRECP EIR/EIS acknowledges the LLPA designation of State Parks, along with National Parks, Department of Defense, etc.; however, we don't see enough specifics as to how the CMAs address linkages and habitat connectivity on and off of LLPA designated areas that lend themselves to the ecosystem scale protection. State Parks have existing resource and habitat protection programs in place per Department directives that individual parks must adhere to. We welcome the opportunity to discuss specifics as to how existing park plans can be addressed in the NCCP, GCP and LUPA.

The BLM LUPA per the draft DRECP EIR/EIS will affect approximately 10 million acres within the DRECP planning area. As mentioned above, State Parks appreciates the long standing cooperative working relationship we have with BLM and look forward to those continued relations. As with the above mentioned non-federal lands bordering State Parks, there are numerous areas where BLM administered federal lands either border or are directly located within a Park unit's boundary. BLMs proposed LUPA provides strong protections and mitigation measures for conservation, and sustainable and responsible OHV recreation, and the OHMVR Division within State Parks appreciates the protections the proposed Special Recreation Management Areas will provide for OHV recreation opportunities in California.

III. Habitat Fragmentation Concerns

Habitat fragmentation and loss of corridors for both wildlife and native vegetation dispersal is a major ongoing concern for State Parks. The proposed BLM DFA within the boundary of OWSVRA which overlays the proposed Ocotillo Wells East SRMA (OWESRMA), could fragment large portions of occupied habitat, disrupting dispersal corridors and isolating, if not possibly extirpating, existing populations of California Species of Special Concern (SSC) plants and animals. These corridors are essential for healthy populations of wildlife and vegetation by providing genetic diversity population expansion. Disruption of movement patterns by the proposed DFA could alter essential ecosystem functions, such as predator-prey relationships, gene flow, pollination and seed-dispersal, competitive or mutualistic relationships among species.

Currently it is difficult to understand how the CMAs on federal and non-federal lands will apply to a given local area and how they will take into account existing land management and habitat management practices and plans. As shown in the Draft DRECP State Parks lands border both federal and non-federal lands that make up both the DFAs and DRECP conservation areas. Understanding how the implementation and monitoring of the CMAs will protect key linkages, corridors, and species protected under existing management practices, where these lands border LLPAs, lacks some specificity for our environmental specialists, as well as how they can tie existing practices to these proposed CMAs.

Again, we would like to see State Parks involvement in the incipient phases of the implementation plan when projects are proposed that have the potential to have any direct or indirect effects on State Park administered lands.

IV. Visual Characteristics

State Parks recommends the DRECP describe how existing visual sensitive resources would be taken into consideration and how view shed analysis on non-federal lands, primarily within DFAs would occur. The DRECP defines BLM's visual resource classes; however, we recommend the plan add specificity regarding how other land use plans, which include visual resource objectives and goals will be considered at the DRECP framework plan level and project specific level. State Parks, as you will see below, have many visual resource characteristics that we believe should be taken into consideration when siting renewable energy projects within a proposed DFA adjacent to park boundaries.

The BLM Visual Resource Management (VRM) analysis for Ocotillo Wells Special Vehicle Recreation Area (OWSVRA) and the Ocotillo Wells East Special Recreation Management Area (OWESRMA) places it in a category of Class IV or Class III (Class III - To partially retain the existing character of the landscape or management activities that may attract attention; Class IV - Provide for management activities which require major modification of existing character of the landscape and these activities may dominate the view and be the major focus of viewer attention).

The proposed OWESRMA, as stated above, is interspersed within the OWSVRA and has many significant and intrinsic visual values, features, and landscapes that State Park staff recommends should be changed to a BLM VRM Class II and III level to be consistent with the management and resource values of State Parks. These values include, but are not limited to, views of rare and unique geological formations, such as the yardangs, Gas Domes, and landmarks such as the Badlands, Shell Reef, Devil's Slide, the Santa Rosa Mountain Range, and the night sky. OWSVRA has been managed with an overarching "spirit of place" value characterized by the remote rugged and isolated natural environment. Park staff recommends that the FEIR/EIS reflect the significance of these visual resources by changing the proposed OWESRMA to a VRM II/III classification.

The above recommendation is supported by the proposed development of the OWESRMA where the BLM worksheet (DRECP Appendix L) for the proposed SRMA states: "the objective of the SRMA is to manage this area for the unique recreational opportunities for both non-motorized and motorized recreation and manage the aesthetic quality of the landscape to minimize degradation and provide a scenic backdrop for visitors and residents."

Table Vol IV.20-1 depicts California State Parks with 1,000 acres of potentially affected visual resources for the No Action Alternative. We request and recommend a

conversation with the REAT Agencies to discuss how these acres were determined and which particular park unit(s) they represent.

Table III.30-3 has errors in the listing of State Parks:

- Agua Caliente is not within the State Park system.
- Desert Cahuilla and Freeman Project are areas within Ocotillo Wells SP and Anza-Borrego Desert SP and are not specific park units.
- Hagen Canyon is within Red Rock State Park and is not a specific park unit.
- Santa Rosa Mountains/San Jacinto State Park is not within DRECP boundary.
- Anza-Borrego Desert SW is part of Anza-Borrego Desert SP and is not a specific park unit.

The DFA's in the western Mojave, as identified in the Preferred Alternative, have the potential to cause substantial degradation of the existing visual character of several State Parks within the West Mojave and Eastern Slopes Ecoregion Subarea including: Antelope Valley California Poppy Natural Reserve, Antelope Valley Indian Museum State Historic Park, Arthur B. Ripley Desert Woodland State Park, Red Rock Canyon State Park, Saddleback Butte State Park and Tomo-Kahni State Historic Park.

We recommend that the draft DRCEP EIR/EIS be consistent with Los Angeles County's Conservation and Open Space Element in the Antelope Valley Area Plan, which will help ensure the valuable visual elements and resources of State Parks are accounted for:

Los Angeles County – Antelope Valley Area Plan

Los Angeles County – Antelope Valley Area Plan states that “In the western Antelope Valley, the seasonal blooms of poppies at the Antelope Valley California Poppy Preserve are well known regionally as a scenic resource. In the eastern Antelope Valley, Joshua trees (Saddleback Butte State Park) embody the Mojave Desert and give the wide open spaces of the area an otherworldly atmosphere.”

The Land Use Policy in the Antelope Valley Area Plan seeks to reduce impacts to scenic vistas by setting aside extensive areas for conservation that include open space designations within the Angeles National Forest and open space administered by the BLM.

The County's Rural Preservation Strategy is the implementation of policies that preserve views by preventing the introduction of urban land uses (DFA's) in SEAs, near scenic hillsides, ridgelines and/or resource areas.

Implementation of policies in the Antelope Valley Area Plan including COS 5.1, COS 5.2 COS 5.6 and COS 5.7 would result in the identification of Scenic

Resource Areas and the protection of those resources by creating buffer zones around scenic landforms.

Implementation of policies COS 18.1 and COS 18.3 would ensure that scenic areas are preserved and maintained as permanent open space.

V. *Ocotillo Wells State Vehicular Recreation Area*

A. *Ocotillo Wells East Special Recreation Management Area and DFA overlay:*

All action alternatives of the DRECP propose to designate BLM lands within the OWSVRA as the Ocotillo Wells East Special Recreation Management Area (OWESRMA). State Parks OHMVR Division appreciates that a SRMA designation will allow the BLM to manage these lands with an emphasis on recreation, and that the existing MOU with State Parks would continue. However, the action alternatives also propose a geothermal-only Development Focus Area (DFA) overlay across most of the BLM parcels, and many private parcels in this proposed SRMA, which causes great concern OWSVRA staff.

The draft DRECP EIR/EIS reiterates throughout all the BLM SRMA Worksheets (Appendix L), and within the document, that “renewable energy development is not allowed in a SRMA due to its incompatibility with recreation”. This statement is contradicted within the Ocotillo Wells East SRMA where it states; that should a geothermal-only Development Focus Area (DFA) overlay an SRMA (as proposed in the Preferred Alternative, along with Alternative 1, 3, and 4) geothermal development will be allowed with a “no surface occupancy” restriction. Of greater concern is that Alternative 2 allows geothermal energy development on these BLM parcels with surface occupancy.

The OHMVR Division/OWSVRA staff strongly opposes any alternative that would allow renewable energy development with surface occupancy within a SRMA, specifically within OWSVRA. The BLM SRMA Worksheets show contradictory actions by not only proposing renewable energy development within a SRMA, but also providing for such development within an established, highly valued, SVRA. Surface drilling and infrastructure would change the park’s rugged desert into an industrial landscape that would forever change the visitor experience and would, per BLM SRMA worksheets, be incompatible with recreation.

Placement of these DFAs within OWSVRA was based on information at the beginning of the DRECP study period that recognized the Truckhaven Geothermal Lease Area approved by BLM in October 2007. The BLM properties are located in a checkerboard fashion across the eastern portion of OWSVRA. In September 2014, BLM advertised a substantially reduced lease area due to the previous lease area failing to generate investors, final lease agreements, and environmental compliance for geothermal development. At a minimum, we recommend, that the

DFAs in the FEIS be reduced to the same geographic area as the active BLM September 2014 lease sections.

It should also be recognized that the DFA within OWSVRA includes multiple privately owned inholdings which have been prioritized for acquisition with OHMWR Division Trust Funds. A number of the private inholdings are very small parcels zoned for recreation and open space, and many of these properties do not have existing easement or rights of access across either BLM or State Park property. These private inholdings may apply for easement rights but would be responsible for all county permits and environmental compliance. Including these parcels within the proposed DFAs presents potential planning and logistical difficulty for park operations that would place an extensive burden on State Parks staff.

OWSVRA is home to a variety of wildlife, contains many springs, the first overland trail into California, and was a frequented trade area for Native American tribes. These pre-historic peoples frequently lived and traded along the ancient Lake Cabulla shoreline which encompasses many of the proposed DFAs. Patton trained in OWSVRA during WWII and is often credited with starting OHV recreation as returning soldiers came back to explore the area in the post war jeeps. The DFAs are located in the midst of these highly valued natural and cultural resource areas. Any surface occupancy would require extensive environmental mitigation to avoid or minimize significant adverse impacts to them in accordance with existing state and federal policies, executive orders, and legislation.

The areas identified as potential DFAs within OWSVRA comprise some of the most suitable habitat for the Flat-tailed Horned Lizard, a SSC, currently petitioned for state listing, and the Colorado Desert Fringe-toed Lizard also a SSC. Other SSC found within the proposed DFA within OWSVRA include Burrowing Owls, American Badgers, and Prairie Falcons. Development in these areas will result in significant and adverse impacts to habitat and result in direct mortality of individuals. In addition to the above mentioned SSC many other plant and animal species are found in abundance within the DFA. Protected desert vegetation and extensive wildflower displays can be found throughout the area. These areas represent large, contiguous segments of functioning and occupied habitat within legislatively protected areas that would be irreversibly impacted and fragmented by renewable energy development projects and associated covered activities.

There are important wildlife corridors, cultural, and visual resources located in close proximity to OWSVRA boundary. Potential changes to these areas due to renewable energy development could have proximity effects on the park and the various resources we are directed to protect. As stated in above comments, regarding the DRECP implementation structure/plan, we request that projects permitted under the DRECP that have the ability to directly or indirectly affect State Parks should incorporate State Park staff review for proposed avoidance and mitigation measures near and within OWSVRA. For example, there are BLM Western Colorado routes of travel (WECO routes) that extend from OWSVRA to

BLM OHV areas to the south. If mitigation property is acquired that contains a WECCO route (as depicted in the proposed OWE SRMA map), OHV access should be maintained to provide connectivity. We would recommend that mitigation parcels that provide connectivity between wildlife areas be prioritized as well.

B. Cultural Resources in Ocotillo Wells SVRA

OWSVRA has a rich and diverse cultural past. For centuries, Native Americans expertly utilized the land and its resources in this area. In the eighteenth century, early Spanish explorers, including Captain Juan Bautista de Anza, led scouting parties in the area to search for an overland route to Alta (Upper) California. In the late 1800s and early 1900s, oil drilling and mineral prospecting occurred in the area. After the First World War, homesteaders were encouraged by a presidential order to occupy areas of the Mojave, Colorado, and Sonoran deserts, and many flocked to the area between 1919 and 1938. During the Second World War, the U.S. commandeered portions of the land to use for military training and firing ranges. Remnants of this military training can still be found throughout the park in the form of munitions, military roads, and vehicles. Since then, OWSVRA has become a popular recreational area for hiking, camping, and off-road vehicle use. The beautiful desert landscape has also been featured in several Hollywood movies and TV shows for more than a half a century. The physical remains of the prehistory and history of Ocotillo Wells can still be found in the park, and many these cultural resources are located in the proposed DFA.

OWSVRA currently has over 900 archaeological sites and over 4,000 artifacts recorded within the park boundary, and several of these sites are cremations. Therefore, the Native American Graves Protection and Repatriation Act (NAGPRA) needs to be taken into consideration for projects within the vicinity of these cremations, in which extensive Native American consultation would need to occur before a project could even take place. Ancient Lake Cahulla's shoreline and many of these very sensitive archaeological sites are located within the proposed DFA, and a large portion of these high value sites have not fully been evaluated for their scientific information.

C. Mapping Errors OWSVRA / OWESMRA

There are mapping errors in the draft DRECP EIR/EIS concerning Ocotillo Wells SVRA that State Parks recommend be corrected in the FEIR/EIS. We recommend BLM work directly with State Park staff to reconcile these errors. We have also provided a map of OWSVRA that shows recommended corrections to these errors. They were also noted on the following maps in data basin (Figures II.3-2 to II.3-8), and include:

- Underlying LUPA designation and biological conservation priority area errors within OWSVRA (SRMA and ACEC overlap, conservation priority areas, NCCP biological conservation areas).

- Legend and ownership boundaries errors.
- Proposed transmission corridors – although new transmission corridors are “conceptual” in the Draft DRECP EIR/EIS, there are refinements that should be done to the proposed conceptual locations and they should be excluded from the OWSVRA boundaries/ownership areas.
- State Parks recommends labeling State Parks on the data basin maps when scale is reduced.

D. Specific recommended changes to Appendix L Ocotillo Wells East SRMA Worksheet. Please see attached BLM Appendix L BLM SRMA worksheet for Ocotillo Wells East SRMA for specific edits.

VI. Antelope Valley California Poppy Natural Reserve

A. Preferred Alternative DFA in proximity to Reserve boundary

State Parks recommends the adoption of Alternative 1 DFA, for the western Mojave, in the FEIR/EIS. This restructuring of the preferred alternative DFA for the FEIR/EIS would avoid interruption of an important habitat linkage, maintain and protect open spaces areas, preserve important scenic resources and would be consistent with land use policies and goals of State Parks and the Antelope Valley Area Plan. This request is supported by the below existing management objectives and plans:

The Antelope Valley California Poppy Natural Reserve was established to protect and showcase the outstanding display of native wildflowers, in particular the California poppy, the State Flower, which was designated as the State Flower of California by the legislature in 1903. In 1978 the State Park and Recreation Commission approved the Department's "Resource Management Plan and General Development Plan" for the Antelope Valley California Poppy Natural Reserve.

The Antelope Valley Area Plan identifies lands outside the existing Reserve boundaries that are of prime concern to present and future environmental values, and to the visitor use within the Reserve, which includes those lands comprising of and surrounding the Antelope Buttes and the Fairmont Butte that could affect or impact the management, the protection and/or the visitor experience of the resources that are found within the Antelope Valley California Poppy Natural Reserve.

It should be noted that these lands within this area have been determined by State Parks to be an area of management concern. It is not intended that all these lands should necessarily be acquired by State Parks and included in the State Parks System. We believe that proper enforcement by Los Angeles County through the use of zoning restrictions and/or land use regulations that these lands

within this area can be publicly or privately managed in harmony and consistent with goals and management of the Antelope Valley California Poppy Natural Reserve and Arthur B. Ripley Desert Woodland State Park.

Los Angeles County – Antelope Valley Area Plan:

Goal COS 4: Sensitive habitats and species are protected to promote biodiversity.

Policy COS 4.2: Limit the amount of potential development in Significant Ecological Areas, including the Joshua Tree Woodlands, wildlife corridors, and other sensitive habitat areas, through appropriate land use designations with very low residential densities, as indicated in the Land Use Policy Map (Map 2.1) of this Area Plan.

Policy COS 4.4: Require new development in Significant Ecological Areas, to consider the following in design of the project, to the greatest extent feasible:

- Preservation of biologically valuable habitats, species, wildlife corridors and linkages;

- Protection of sensitive resources on the site within open space;

- Design of required open spaces to retain contiguous undisturbed open space that preserves the most sensitive biological resources onsite and/or serves to maintain connectivity;

Policy COS 4.5: Require new development to provide adequate buffers from preserves, sanctuaries, habitat areas, wildlife corridors, State Parks, and National Forest lands.

Policy COS 4.6: Encourage connections between natural open space areas to allow for wildlife movement.

Goal COS 18: Permanently preserved open space areas throughout the Antelope Valley.

Policy COS 18.1: Encourage government agencies and conservancies to acquire lands in the following areas and preserve them as permanent open space:

- Significant Ecological Areas, including Joshua Tree Woodlands, wildlife corridors, and other sensitive habitat areas;

- Scenic Resource Areas, including water features such as the privately owned portion of Elizabeth Lake, significant ridgelines, buttes, and other natural landforms such as the Antelope Valley California Poppy Natural Reserve and Arthur B. Ripley Desert Woodland State Park;

VII. State Office of Historic Preservation / Cultural

The California Office of Historic Preservation and cultural staff appreciate the protections the Draft DRECP EIR/EIS proposes for cultural resources, and the on-going collaborative efforts to develop a DRECP Section 106 Programmatic Agreement between the SHPO and BLM and the USFWS.

Below are the comments and recommended edits put forth by State Parks cultural staff and the OHP and the SHPO.

Volume III.8

Page III.8-1: Include cultural landscapes and Traditional Cultural Properties as cultural resources that are eligible to be listed in the National Register of Historic Places as historic properties.

Add to first sentence of paragraph 2 “ Cultural resources are categorized as buildings, sites, structures, objects, and districts (*which include cultural landscapes and Traditional Cultural Properties*) under both federal law and”

Page III.8-1: Historic-period cultural resources are not limited to associations with Euro-American exploration and settlement of an area. Cultural resources in the historic-period are often associated with Native American tribes and need to be identified and evaluated as historic properties. Tribal history during the historic period should be added to historic contexts in the DRECP.

Add to end of paragraph 5 after “...or ethnic neighborhoods and structures.”
“*Ethnographic resources may include historic period Native American resources.*”

Page III.8-2, Section III.8.1.1: As of December 2014 the National Historic Preservation Act is found at title 54 U.S.C. 300101.

Change citation for National Historic Preservation Act to **54 U.S.C. 300101** as this law was moved in December 2014. Please note that the regulations implementing Section 106 of the NHPA, at 36 CFR part 800, are not affected by this recodification.

Page III.8-4: When referencing 36 CFR Part 800 throughout the document, for consistency, use the same language as is used in the regulations (e.g., 36 CFR 800.5[a][1] uses the word “*characteristics*” not “*qualities*” as appears in the text on this page).

Page III.8-5: The document needs to further clarify the role and responsibility of the U.S. Fish & Wildlife Service under Section 106 of the NHPA.

In the first paragraph under “U.S. Fish and Wildlife Service Role and Responsibility Under Section 106” change second sentence to read: “*The Pacific Southwest Region of the USFWS has determined that issuance of ESA section 10(a)(1)(B) incidental take permits for activities covered under the GCP constitutes an undertaking...*”

Page III.8-5: Expand on the discussion of the Programmatic Agreement (PA) to be clear that the PA does more than assess the potential effects on historic properties and mitigate. It should be clear to the public that the PA will follow steps under 36 CFR 800 and, in *full consultation* with the public and SHPO, identify, evaluate for significance, and assess effects to historic properties. Also, use language standard to the National Historic Preservation Act and 36 CFR 800.

Change the last sentence of the second paragraph under “U.S. Fish and Wildlife Service Role and Responsibility Under Section 106” as follows: “*The Programmatic Agreement will establish the conditions permit applicants will be required to implement to identify, evaluate for significance, and assess effects to historic properties, and to mitigate any adverse effects, by following the steps under 36 CFR 800 in full consultation with the public and SHPO.*”

Page III-8-21: The paragraph that follows “Traditional Cultural Properties” give the impression that only properties associated with Native American groups can be considered TCPs. This is not the case and should be clarified in the document. In this section, please provide examples of TCPs that are not associated with Native Americans exclusively.

Page III. 8-68, Section III.8.3: There is no official online list of historical resources in California. The list that is referenced in this section makes it clear that it is only a list of properties that have been nominated to a registration program and heard by the State Historical Resources Commission.

Change the final sentence in the first paragraph of this section as follows: “...*the NHRP, the online list of registered California Historical Resources that have been heard by the State Historical Resources Commission, and the BLM Cultural Resources Geodatabase.*”

Page III. 8-68, Section III.8.3: It appears disingenuous to say that a full records search wasn’t completed due to the CHRIS Information Centers. Rather, we assume the decision was made that it would be too expensive and/or time consuming to complete. Therefore, change the last three sentences in the second paragraph of this section as follows: “*A full records search for the entire Plan Area was not completed because the resource data is housed in five different CHRIS Information*

~~Centers with different database systems. It was not feasible to produce a record search of over 22 million acres using the CHRIS. Volume IV, Chapter IV.08...~~

Page III. 8-81-83, Historic Trails: We have requested multiple times that Route 66 needs to be included in the trails section. This is a major oversight that needs correcting.

Add as final paragraph of the Historic Trails section (page III.8-83): *“The Old National Trail, subsequently US Highway 66 (Route 66,) traverses the DRECP area from Barstow to Topock. The road has been surveyed and evaluated for NRHP eligibility by the National Park Service and portions of the road have been determined eligible for listing in consultation with the SHPO.”*

Volume IV.8

Page IV. 8-5 and 8-6, Section IV.8.2.1.1, Impacts of Site Characterization: Methods employed to identify historic properties within the Area of Potential Effects (APE) for an undertaking include pedestrian survey but not subsurface archaeological testing. This is presumably related to the earlier statement that subsurface testing would result in major disturbance of the resource. It is the position of the Office of Historic Preservation (OHP) that archaeological testing that does not exceed the threshold of 5% of the area of the site or 4m³ of archaeological soil is not considered to be an adverse effect. Further, it is more reasonable and cost-effective to identify, evaluate for significance, and then avoid historic properties than to discover them inadvertently. Archaeological testing should be considered when assessing the impacts from site characterization activities (e.g., installation of meteorological stations and construction of access roads, staging areas).

In the second sentence of the second paragraph of this section, remove the phrase “...as this testing would result in a major disturbance of the resource.” On the next page, move item #6 to the #5 position, and insert the following as a new item #6 *“When subsurface testing is required to assess the potential for eligibility to the NRHP/CRHR of a resource, limited archaeological excavation not to exceed the threshold of 5% of the area of the site or 4 cubic meters of archaeological soil may be done to determine eligibility and inform project siting.”* This would then make the geological testing #7.

Page IV.8-7, Ground Disturbance: Vibration from construction activities, e.g. vehicles, geotechnical borings can disturb not only historic buildings and rock art sites but can also diminish the integrity of the vertical location of intact subsurface archaeological deposits, causing an adverse effect to a historic property.

Under the bullet beginning with the word “vibration” add at the end of the sentence *“and diminish the integrity of the vertical location of intact subsurface archaeological deposits, causing an adverse effect to a historic property.”*

Page IV.8-7: Add substations to examples of structure installations.

Page IV.8-8: When discussing effects to historic properties, use language found in and used in the National Historic Preservation Act (NHPA); e.g., use *“Introduction of visual elements can diminish the integrity of a property’s significant historic features”* instead of *“Changes to the visual setting can affect the value of buildings and structures, trails. . . and other cultural resources for which the visual setting is an important component of a site’s significance.”*

Page IV.8-9, Section IV.8.2.2: Impacts of Reserve Design: Reserve design lands can provide protection and be of benefit to the historic properties located within them; however Historic Properties are unique and non-renewable, therefore protecting historic properties in reserve design lands does not offset effects elsewhere. For this reason, add as a new second sentence to this section: *“However, historic properties are unique and non-renewable and, therefore, protecting historic properties in reserve design lands as an offset to impacts elsewhere does not eliminate adverse effects to other historic properties.”* Start the last sentence of that paragraph with *“Additionally”* in place of *“However”* to avoid two consecutive sentences starting with the same word.

Page IV.8-7, bullet item 3, change second sentence to read: *“Increased human access could expose these resources to a variety of stressors including trampling artifacts, creating tracks and dust from recreational vehicles, illegally collecting artifacts, vandalizing rock art and other resources, and inadvertently damaging unrecognized resources.”*

Pages IV.8-15, IV.8-16, IV.8-18: Delete the first sentence under “Operations and Maintenance” on each of these pages as it is unclear what is meant by the word “fewest” and therefore causes confusion without adding any substantive information to these sections. These sentences are unnecessary as each of these sections can simply begin with discussion of possible damages to the resources, just as the other sections on these pages do.

Page IV.8-20, first bullet point on this page: When discussing phased identification through the use of an undertaking-specific Programmatic Agreement (PA), cite **36 CFR 800.14(b)**, not 36 CFR 800.6.

Page IV.8-23: Add the following to first paragraph under Mitigation after the current second sentence: *“It should be noted that the mitigation measures described below do not necessarily lessen impacts below a level of significance. Additionally, as with resource identification, assessment of effects and mitigation measures intended to resolve those effects should be developed on consultation with those communities, both Native American and others, that attach religious and/or cultural significance to the resources. For projects subject to Section 106 of the NHPA, the SHPO/THPO would also be a party to this consultation and the resulting mitigation measures would be memorialized in a Memorandum of Agreement.”*

Page IV.8-3, Section IV.8.2: Add after third sentence in first paragraph of this section: *“In all cases, impacts to historic properties are best defined and determined in consultation with those people for whom the property is significant.”*

Page IV.8-35: Change second sentence under Future Assessment Areas as follows: *“The future assessment will determine suitability for renewable energy development or for ecological or cultural conservation.”*

Page IV.8-35: Add to last sentence under Special Analysis Areas: *“...characterized in a qualitative manner in this document.”* (Also add this wherever else this reference to a “qualitative manner” appears in this section.)

Page IV.8-38: The following terms are used in the document but do not have a standard regulatory or statutory definition, as such, they must be defined in the document: “High potential historic site”, and “high potential route segment.”

Page IV.8-39: Relocating a trail that is eligible for listing in the NRHP would diminish the integrity of the location, design, association, workmanship and materials, feeling, setting and it would most certainly be an adverse effect under NHPA. For this reason, add a final sentence to the paragraph after Mitigation Requirements as follows: *“It should be noted that relocating a historic trail may mitigate impacts for recreational purposes but would still be considered an adverse effect to the trail as a historic property.”*

Page IV.8-39: Add to end of third bullet under “Cultural and Tribal CMAs for the Entire Planning Area”: *“...for traditional use and maintain confidentiality of information and locational data.”*

Page IV.8-40: Consider that implementing CMAs that reduce fugitive dust and consequently adverse effects to the setting of historic properties may cause adverse

effects to historic properties with different vital aspects of integrity (archaeological site).

Add to second bullet point under "Other CMAs for the Entire Planning Area," after first sentence: "*However, dust mitigation activities can have adverse impacts on cultural resources such as archaeological sites.*"

Page IV.8-41: Recommend adding to mitigation for cumulative effects, a regional synthesis of existing data.

Change bullet point that begins with "A management fee..." as follows: "*A management fee, defined at a per-acre rate and annual escalation provision for the life of the grant, will be paid to BLM as partial mitigation for the cumulative effects on cultural resources across the DRECP area and may be used to develop regional research designs, a regional synthesis of existing data, and other forms of off-site and compensatory mitigation.*"

Page IV.8-43: Many of the mitigation measures listed for built-environment resources are not appropriate for this type of resource (they are instead appropriate for archaeological sites). For this reason, items a, e and f should be deleted entirely. Item h should be moved to the top of this list (new item a) and have a third sentence added as follows: Preservation or reuse of a historic structure must be guided by a written treatment plan that meets the Secretary of the Interior's Standards." Item i should have the first four words removed and be rewritten as: "HABS/HAER documentation does not provide adequate mitigation to reduce impacts to a less than significant level, therefore implement mitigation that..."

Pages IV. 8-43 and IV.8-45: The significance of historic properties is evaluated using the National Register Criteria (36 CFR Part 63) and such properties are significant by being associated with an important historic context while retaining historic integrity of those features necessary to convey its significance. Setting is the physical environment of a historic property and is just one of the seven aspects of integrity. For this reason, delete "*if the eligibility of that resources is based upon its visual setting*" from item c under CR-1a and item D under CR-2a.

Page IV.8-45: Vibrations from ground disturbing activities can have adverse effects to sub-surface archaeological deposits. For this reason, change item f under CR-2a as follows: "*Conduct analyses to determine the impact of vibration from ground-disturbance activities (such as geotechnical boring) on the structural integrity of built-environment resources and prehistoric resource such as rock art, and on the integrity of the vertical location of intact subsurface archaeological deposits.*"

Page IV.8-45: Archeological sites must be evaluated under all four National Register/California Register criteria. Data recovery destroys the cultural resource and is an adverse effect upon any resource that is eligible under criteria A, B or C (or 1, 2, or 3). It should be used only in cases where it is the only available option. For this reason, add to the end of item g as follows: “*Data recovery is considered an adverse effect for resources eligible under criteria A, B, or C (or 1, 2, or 3). As such, it is only appropriate for those properties eligible solely under criterion D (or 4).*”

OCOTILLO WELLS EAST Special Recreation Management Area (SRMA)

RMA/RECREATION MANAGEMENT ZONE (RMZ) OBJECTIVE(S) DECISIONS

Ocotillo Wells East SRMA is partially managed by Ocotillo Wells State Vehicular Recreation Area (OWSVRA) in the areas west of Highway 86 and between Highway 78 and County Road S-22, including section 24 of the Seventeen Palms Quadrangle, township 10 South, range 9 East, San Bernardino Base Meridian. Within that area, BLM ownership and California Department of Parks and Recreation (DPR) ownership is a checkerboard pattern by sections with some private parcels intermingled. South of Highway 78, portions of BLM land is contiguous and portions of private land are intermingled. This area is not part of the OWSVRA.

Objective Statement: Designate this area as a Special Recreation Management Area. To manage the Ocotillo Wells East SRMA for the unique recreational opportunities for both non-motorized and as an open Off Highway Vehicle (OHV) motorized recreation area. Manage the aesthetic quality of the landscape to minimize degradation and provide a scenic backdrop for residents & visitors. As this SRMA is interspersed within the OWSVRA, the Memorandum of Understanding (MOU) with DPR should be continued. Those areas within OWSVRA would also be subject to the DPR Off-Highway Motor Vehicle Recreation (OHMVR) Division policies and programs for recreational use and resource protection.

Activities: Casual recreation with motorized vehicles is the main activity here. Ocotillo Wells East SRMA is managed as an open OHV area and route designation as “Open”, “Limited” or “Closed” is analyzed in the WECO TTMP. Visitors ride all types of motorized vehicles specially built or modified for sand or OHV based recreation; plus camping, scenic touring, trail riding, and dune play. Activities include special & competitive events; family, friend and club gatherings; amateur, student & commercial filming and photography. Hiking, wildflower viewing, picnicking and exploring historic ruins.

Experiences: Visitors frequent Ocotillo Wells East primarily for the unique OHV opportunities. Visitors vary from those from North America to those from abroad, with majority of users coming from California & Nevada, who come to experience this beautiful & remote desert system. They come here to ride together with family, friends, and like-minded people. A major draw for this site is the open desert nature of the area, winter climate, and rugged terrain. Most visitors come to enjoy their vehicles and camping with extended family and friends. They enjoy the various destination points of interest, terrain challenges, and learning about the area’s natural and cultural history. The long distance OHV trail opportunities provide people a sense of freedom and openness to explore and go into desolate areas.

Benefits: This area provides personal benefits that are tied to personal accomplishment and perseverance in this remote and inhospitable environment. Individuals are challenged to build, borrow, buy, modify or rent vehicles to travel here; everything about coming here and traveling through the area is difficult and the rewards are increased self-worth, trust, an expanded capacity to travel and experience other areas. This area with its remoteness and few roads and services, contributes to community, social, economic and environmental benefits in its ability to generate tourism. This SRMA provides connectivity among areas and trails, in location and time, providing outstanding motorized riding and touring experiences. Here

people learn to appreciate the subtle links and connections between all living things and water. In this stark landscape people become aware and grow to appreciate the beauty, creativity & tenacity of nature; leading to feelings of well-being and inspiration for life. This area provides a relatively safe & easy setting for legal motorized OHV play and therefore reduces pressure and potential impacts to [more sensitive](#) areas.

RECREATION SETTING CHARACTERISTICS (RSQ) DESCRIPTIONS

Physical Components: The qualities of this landscape have the characteristics fitting the *Front Country Classification*. A beneficial feature of this SRMA is extensive access, combined with this areas location within a couple hours' drive of the Los Angeles and San Diego areas. This SRMA stretches along Highways 86 from Indio to El Centro. The Ocotillo Wells SRMA area is a bit more remote, yet is adjacent to rural communities. This entire SRMA shares a common natural semi-remote look and connectivity. Several maintained county roads, and power lines bisect the area, with scattered residents, mines and communication sites interspersed throughout the area. In combination with the SVRA, visitor facilities are located along primary access roads and at popular staging sites in the OHV open areas. They include kiosks, vault toilets and shower facilities, vehicle barriers and camping areas.

Social Components: The sheer size of this area allows visitors to disperse and therefore not appear often in large concentrations. However, on a given weekend the proximity and size of this area draws a large number of people, moving around the area, or riding the main roads will generally result in on-going contacts throughout the day. This pattern results from the geography, existing trail locations and land use management prescriptions.

Organized events range from a dozen to 1,000 participants. Most casual use is dispersed and varies from single users to large family and friend groups that may involve a couple dozen primary vehicles and several dozen off-highway vehicles. User data is monitored by DPR within OWSVRA.

Operational Components: Through an interagency MOU, OWSVRA is to manage all recreational activities within its borders, protect recorded natural and cultural resources and provide law enforcement and emergency services. Interpretive panels are dispersed are dispersed throughout the area and rules are clearly posted; temporary, permanent and emergency closures and use restrictions are common for sensitive resources, health and safety purposes, and to avoid conflicts among visitors. Visitor services consist of law enforcement patrols and emergency services, park and trail maintenance, [sanitary, and](#) trash services and an interpretive program. State park resources staff monitors and restores natural and cultural resources according to OHMVR guidelines. Visitor use facilities within OWSVRA include restrooms and showers, developed and open camping, vault toilets, ramadas and picnic tables. The park's interpretive facilities include a Discovery Center complex, ~~and~~ youth training tracks, [and interpretive panels throughout OWSVRA.](#)

MANAGEMENT ACTIONS & ALLOWABLE USES

Recreation and Visitor Services Program:

The OWSVRA will:

- Provide opportunities for an open OHV area, organized and unorganized, as well as other compatible, natural resource uses.
- Provide education, information and interpretation about resource values; balance organized & unorganized uses.
- Provide for other resource uses compatible with organized and unorganized events.
- Provide organized and unorganized OHV recreation opportunities.
- Minimize resource impacts, ensuring continued use.
- Provide a safe, challenging environment and a low level of dispersed facility development
- Provide access, desert travel information, staging and camping opportunities,
- identify the boundaries,
- Manage human waste and ~~to~~ minimize negative impacts to natural and cultural resources.
- Determine and enforce fees, Camping limits and Regulations.

Currently, the majority of Ocotillo Wells East SRMA is managed as an open OHV area (See WECCO TTMP). All routes of travel will be managed as open, limited or closed as designated in the WECCO TTMP. ~~BLM will consider leasing these lands to retain the recreational values that are provided. As part of BLMs current environmental review for the Ocotillo Wells Recreation Area in Imperial County, BLM will prepare an environmental impact statement to analyze the efficiency and effectiveness of resource and recreation management at the OWSVRA and proposed amendment to the BLM California Desert Conservation Area (CDCA) Plan (Per BLM NOI 2/9/15). California State Parks, who manage OWSVRA through a Memorandum of Understanding, will jointly prepare an environmental impact report for their General Plan update. BLM will consider transferring these lands to OWSVRA to facilitate management and retain the recreational and resource values that are provided. (Note, the below chart will need to address new acreage ownership should the transfer happen).~~

Acres by Alternative on BLM Lands:

No Action	Preferred Alternative	1	2	3	4
0	58004	21336	21351	21351	21351

Other Programs: Renewable energy development is not an allowable use in SRMAs due to the incompatibility with the values of the SRMA. Two exceptions to this management action are: 1) geothermal development is an allowable use if a geothermal-only DFA overlays the SRMA designation and complies with a “no surface occupancy” restriction (except for those areas already under lease, which may have surface occupancy); and, 2) in the Preferred Alternatives if a DRECP variance land designation overlays the SRMA, renewable energy may be allowed on a case-by-case basis if the proposed project is compatible with the specific SRMA values. ~~Alternative 2 – Maximum Development Flexibility Alternative – will allow for “surface occupancy” for existing and future permits.~~

Implementation Decisions: Through an interagency MOU, OWSVRA manages all recreational activities, protect ~~recreated~~ natural and cultural resources and provide law enforcement and emergency services.

Comment [CSP1]: CSP is tasked with protecting "un recorded resources as well"

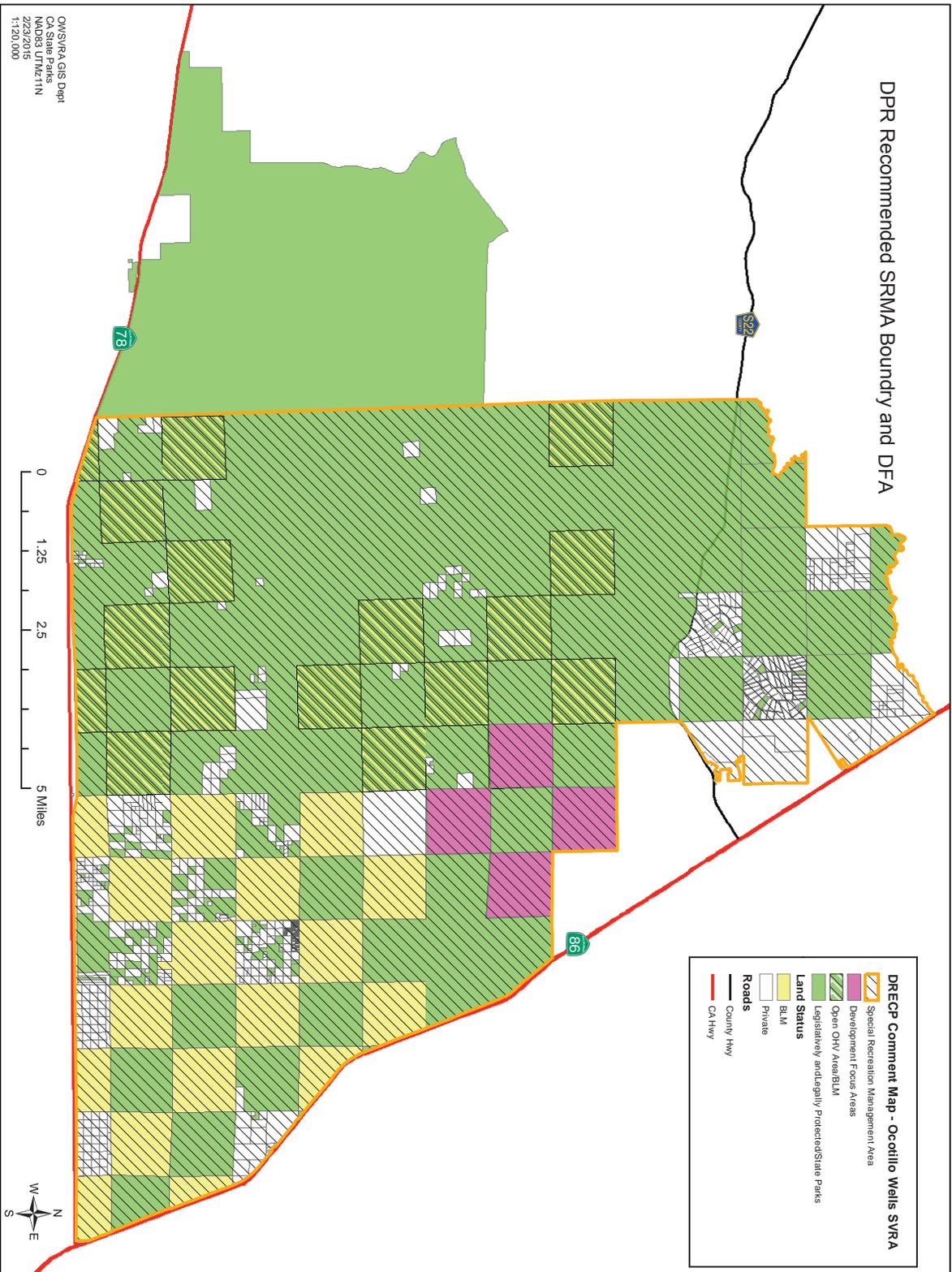
An activity level plan (BLM) and/or a General Plan/EIR would be developed to identify and designate current and future recreational opportunities, appropriate facilities to provide for and manage the proposed uses, parameters for streamlined Special Recreation Permitting, staffing and funding needs,

parameters for facility and road/trail maintenance, partnerships, possible recreation fee considerations, and an implementation schedule. This plan will identify potential impacts to eligible archaeological properties within the SRMA and protect eligible sites due to [potential](#) impacts from OHV use and camping.

Mitigation:

1. Maintain through traffic motorized route network connectivity with roads and trails leading into and through the Ocotillo Wells East SRMA.
2. Manage renewable energy development on adjacent and nearby lands to avoid traffic conflicts with visitors & permitted uses.
3. ~~The proponent will manage "surface occupancy"~~ Surface occupancy will not be allowed and adjacent surface occupancy will be managed to consider public health and safety by providing education, signage, fencing, etc. as determined by OWSVRA and the BLM.
4. The proponent will replace any existing facilities that are no longer accessible by the public due to renewable energy development.

DPR Recommended SRMA Boundary and DFA



OW/SVRA GIS Dept
CA State Parks
Nathan Finkeltin
2/23/2015
1:120,000

Review for FIGURE II.3-2, Preferred Alternative - Plan-wide Reserve Design Envelope

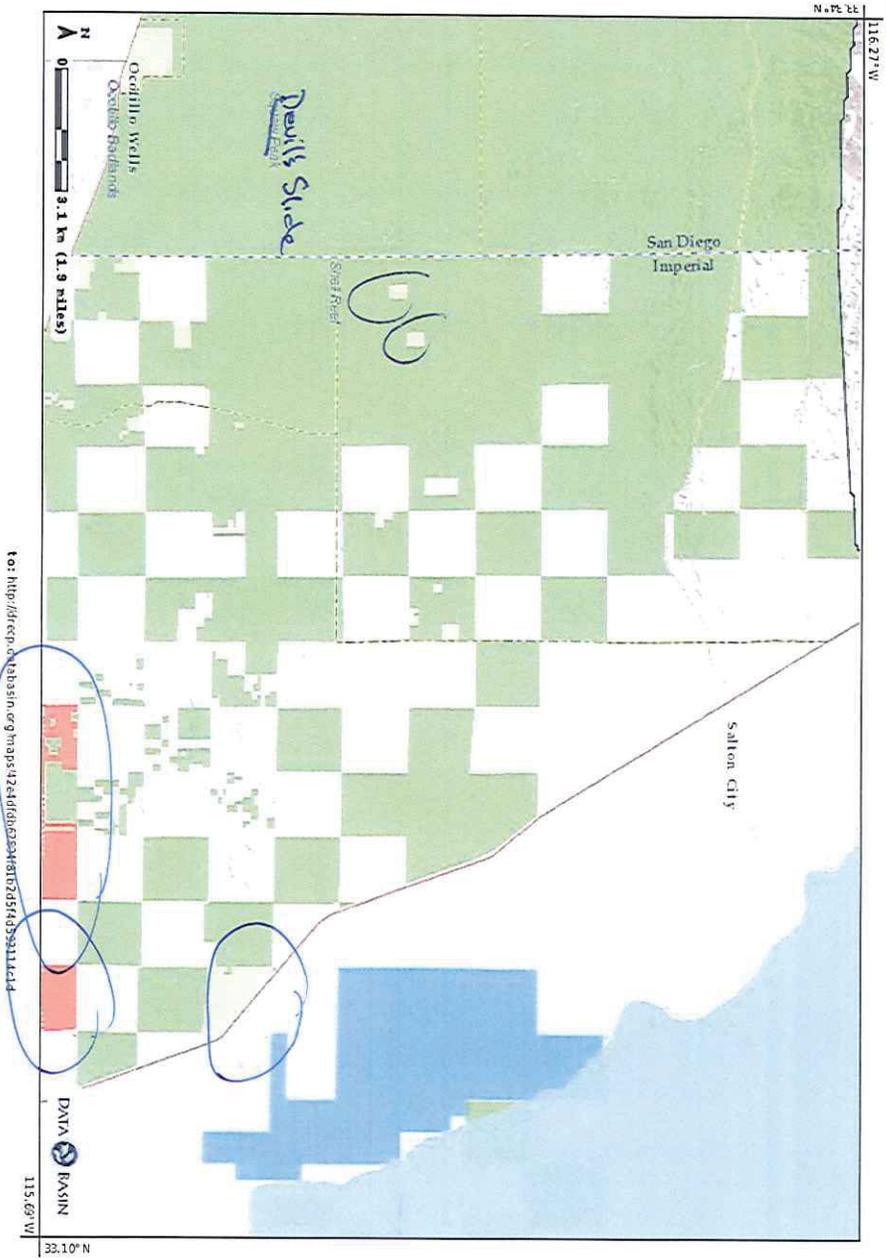
Map URL: <http://drcrp.databasin.org/maps/42e4d6b62804f81b2d5f4d592114c1d>

Date: February 3, 2015

General Comments
Light green

Orange/brown conservation priority areas north of Highway 78 should be removed as they are in the SRMA and OW SVRA and will be managed per the OHV Division resource protection guidelines.

Map



For an interactive map with legend go

for <http://drcrp.databasin.org/maps/42e4d6b62804f81b2d5f4d592114c1d>



115.69° W

33.10° N

Review for FIGURE II.3-3, Preferred Alternative - Plan-wide DFAS

Map URI: <http://drecp.databasin.org/maps/ae86290957de45998dc13441123d394b>

Date: February 5, 2015

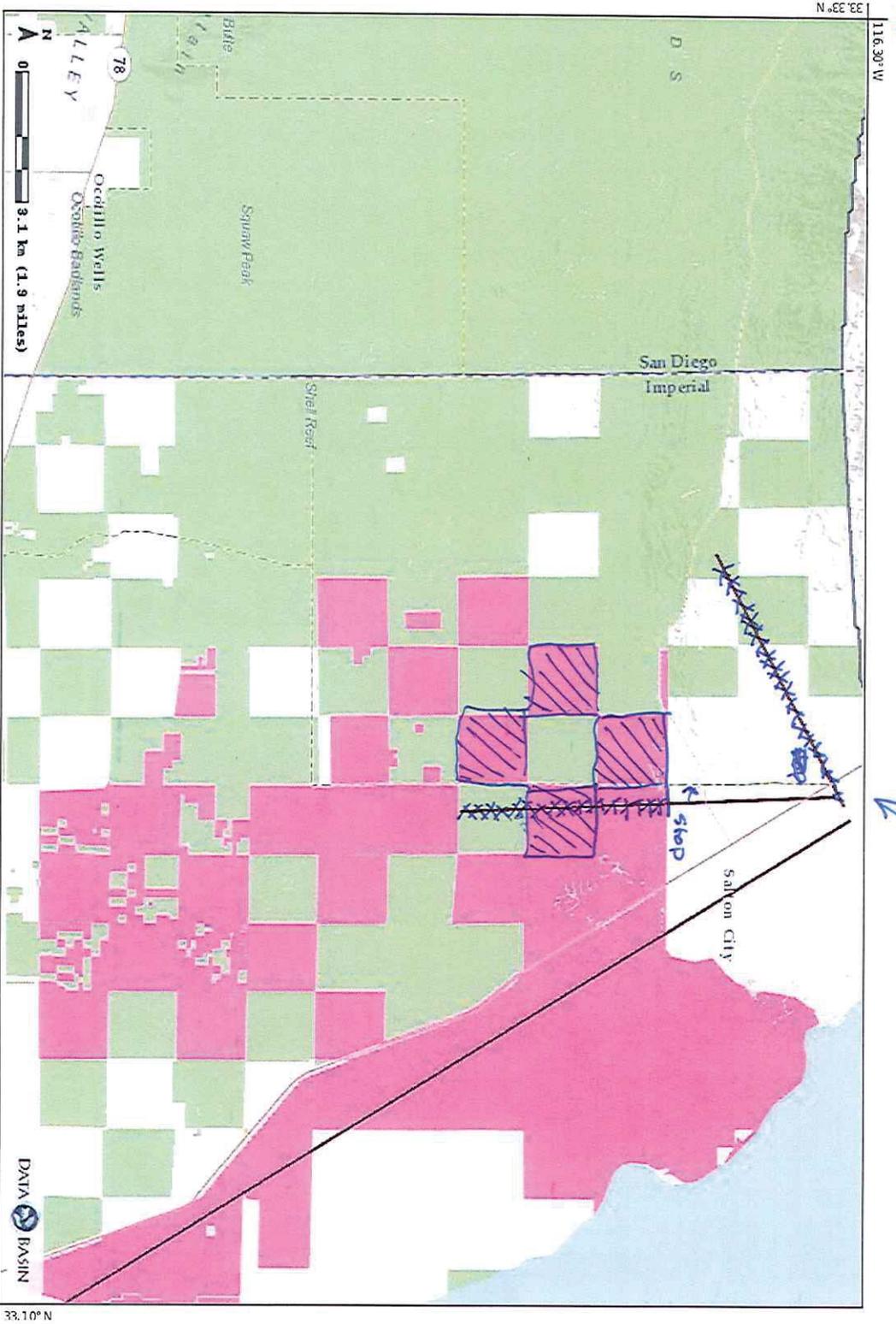
General Comments

remove DFAs from Ocotillo Wells SVRA SRMA in following priority:

- 1) no surface occupancy in any alternative/stop transmission corridors at OWSVRA boundary
- 2) no DFAs on private property which are inholdings in SVRA and prioritized for purchase with OHV Trust funds
- 3) Remove DFAs from expired leases on BLM *everything but the sections as* 
- 4) Remove all DFAs

- 5) place transmission corridors on existing roads - they are offset in this map

map



For an interactive map with legend go to: <http://drecp.databasin.org/gm/aps/ae86290957de45998dc13441123d394b>

Review for FIGURE II.3-4, Interagency Preferred Alternative - BLM LUPA

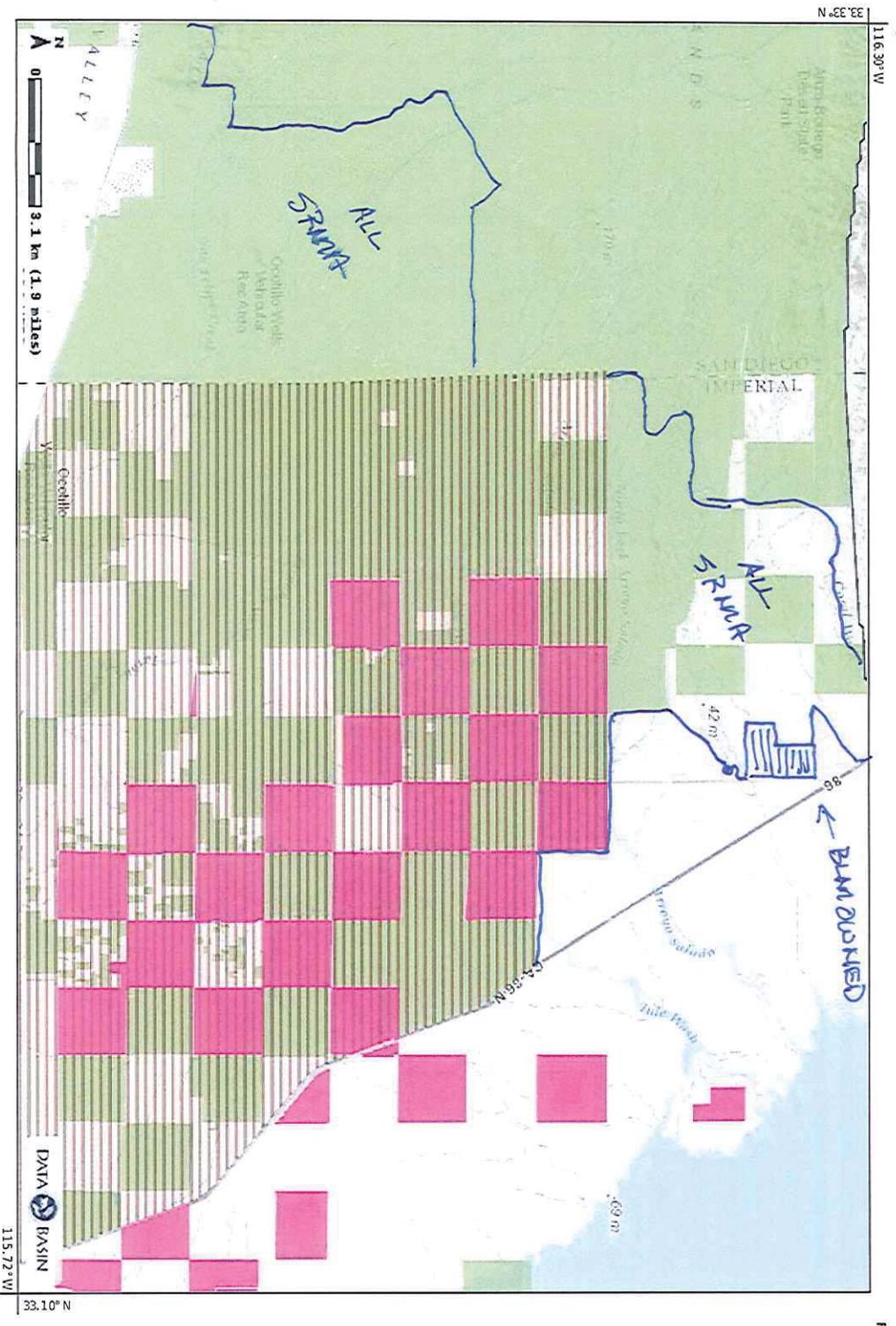
Map URL: <http://drecp.databasin.org/maps/7a338b84d1724cfb92ca391284dee26>

Date: February 5, 2015

General Comments

Please note our suggested replacement map. Please add BLM property north of S-22 and next to Poleline Road and all the rest of Ocotillo Wells SVRA to the SRMA.

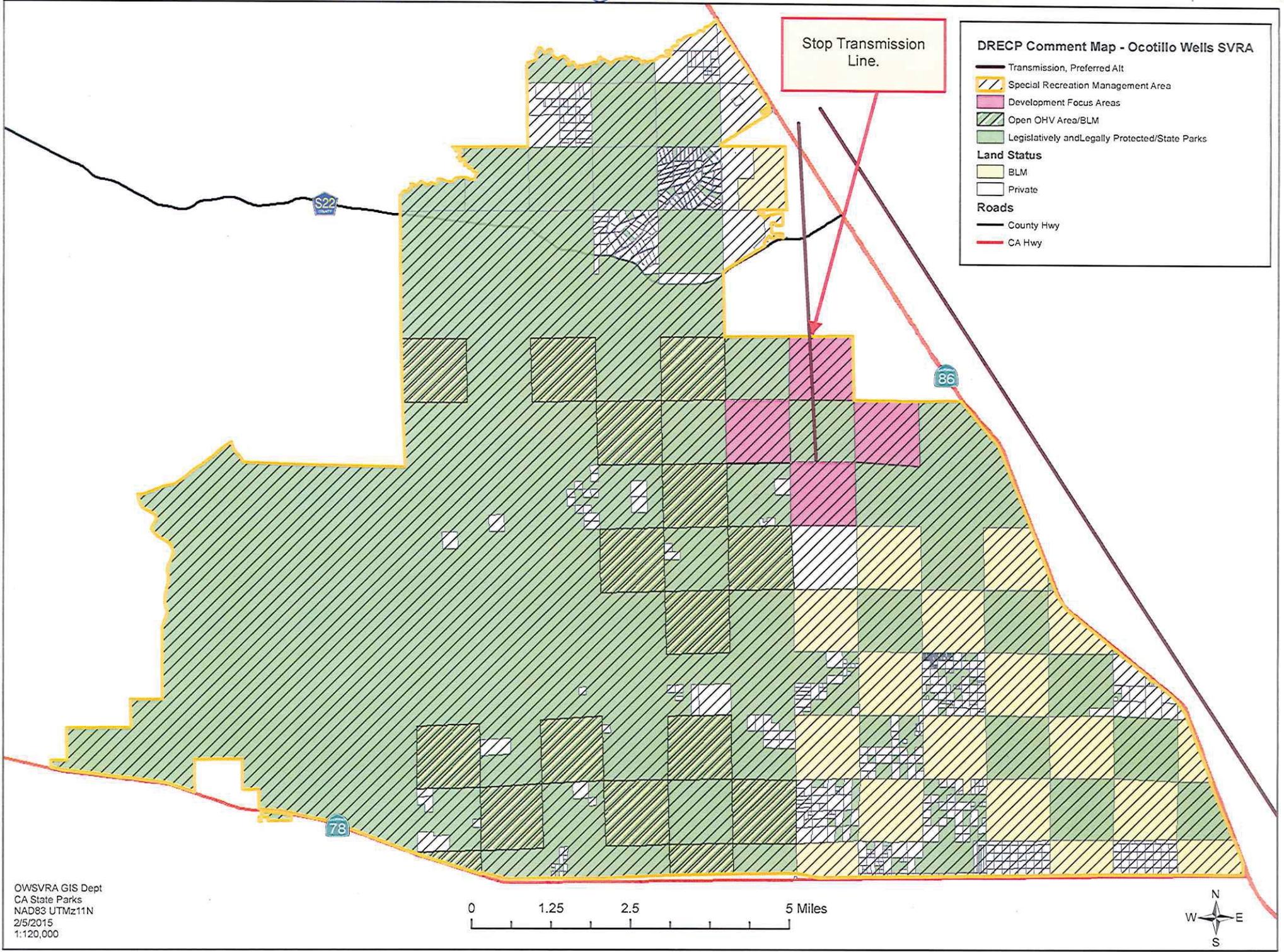
map



Interactive map with legend go to: <http://drecp.databasin.org/maps/7a338b84d1724cfb92ca391284dee26>

For an

For FIGURE 11.3-4 @ this location & for OW East SRMA - all alternatives



Review for FIGURE II.3-7, Preferred Alternative - Natural Community Conservation Plan

Map URL: <http://drcpp.databasin.org/maps/7e526621955242a2ac617be521be1cd1>

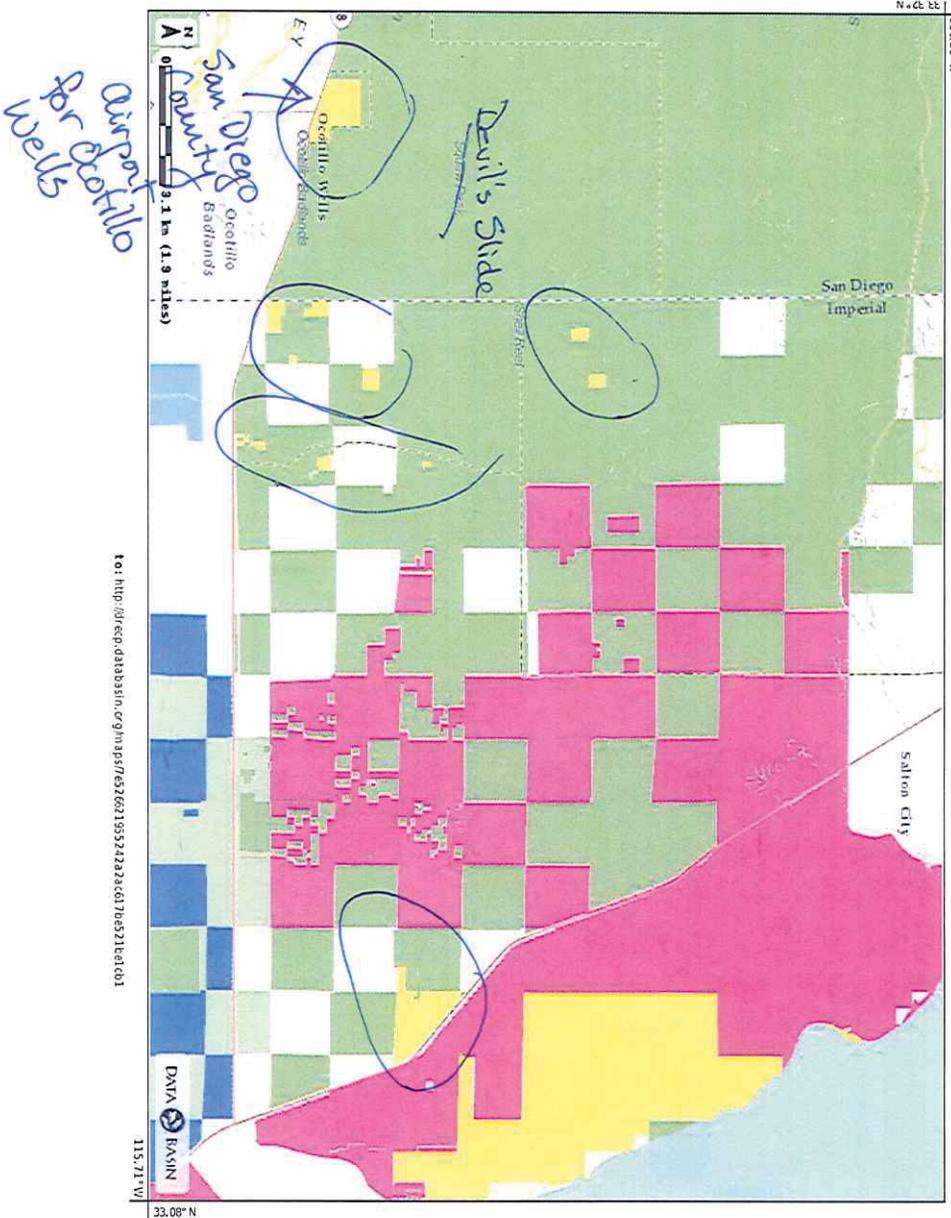
Date: February 5, 2015

General Comments

Please remove the yellow and light green biological conservation areas from within OWSVRA. These areas are inholdings that are prioritized for purchase with OHV Trust funding and they would be managed under the OHMNR resource protection guidelines. Also, please remove "Squaw Peak" from all the maps as the name has been changed to "Devil's Slide"

Map

For an interactive map with legend go



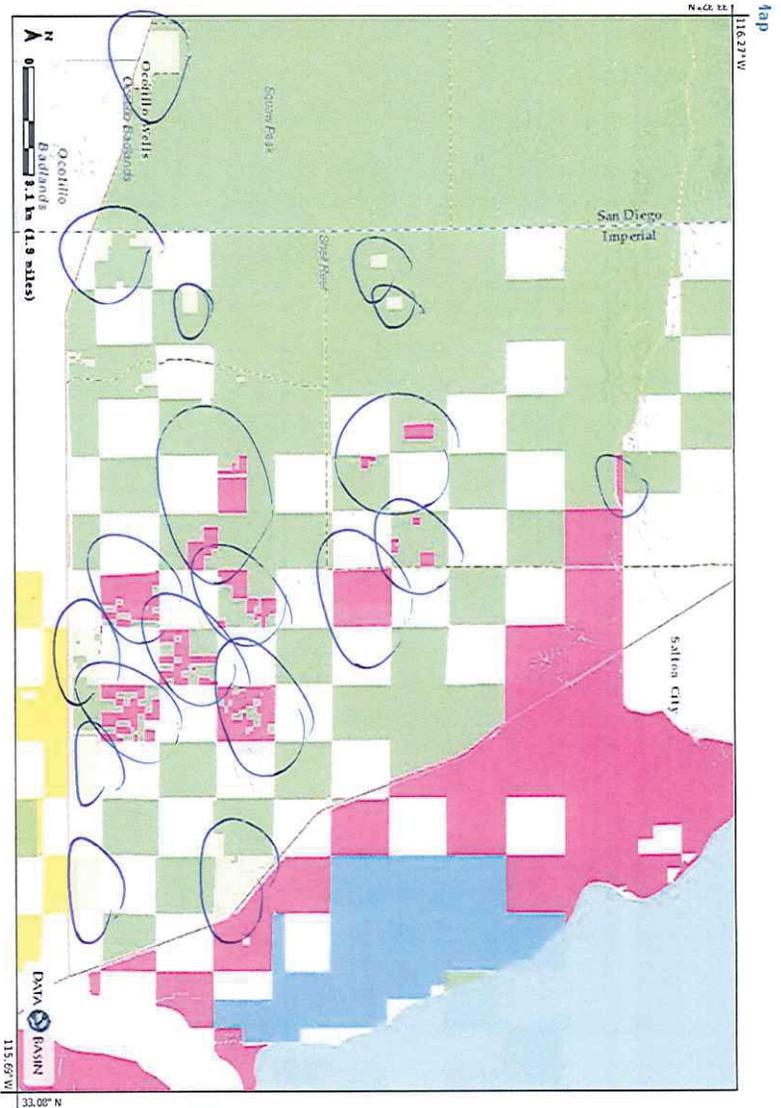
REVIEW FOR FIGURE II.3-8, Interagency Preferred Alternative - General Conservation Plan Non-BL

Map URL: <http://drcp.databases.mn.org/maps/c58760c6e2b5470496a3f056eccc5378>

Date: February 4, 2015

General Comments

Please remove the private inholdings within OWSVRA as DFAS because most do not have existing legal access and most are zoned recreation and open space. Also remove the Conservation Planning areas - the light green within OWSVRA.



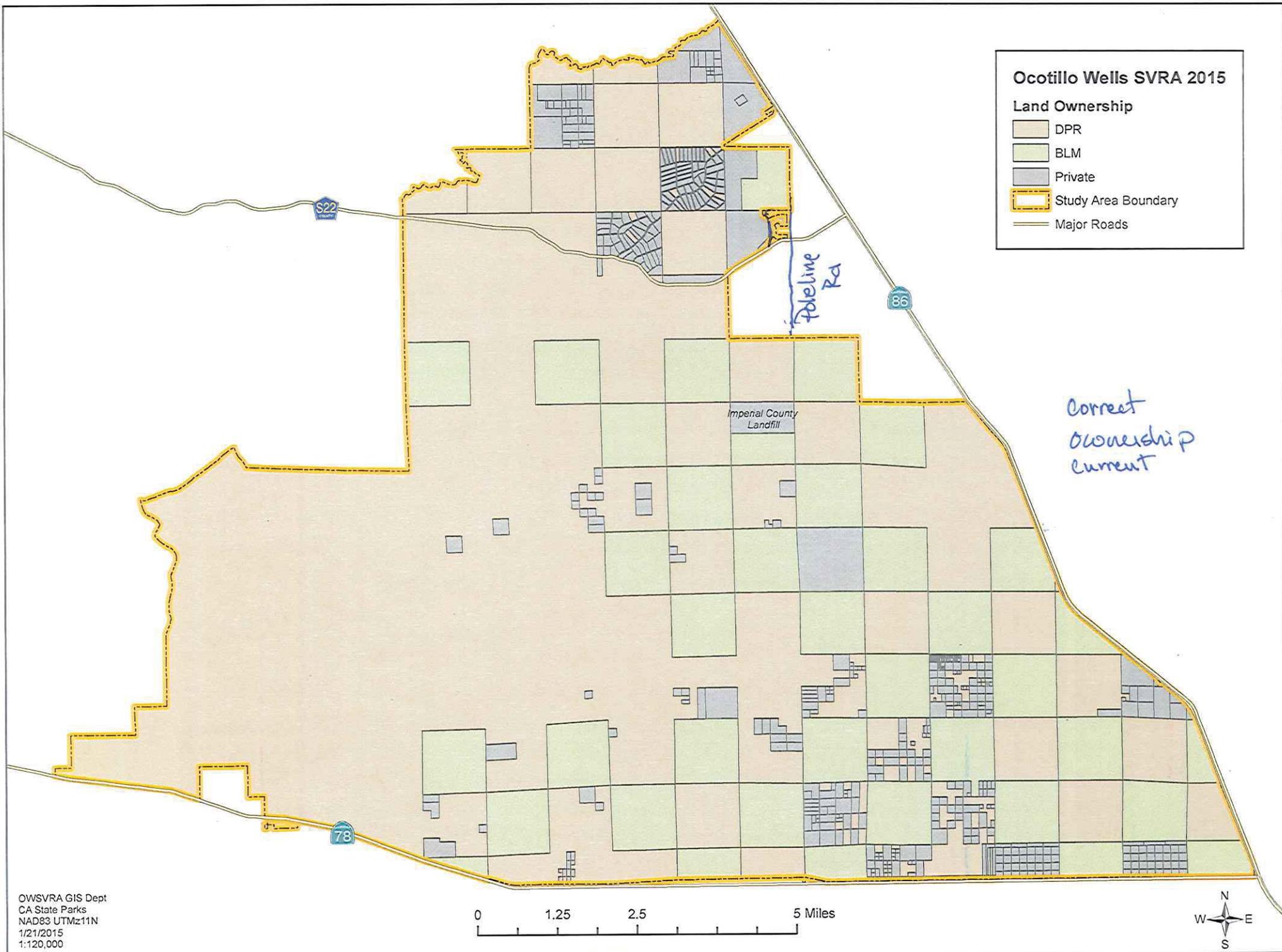
For an interactive map with legend go to: <http://drcp.databases.mn.org/maps/c58760c6e2b5470496a3f056eccc5378>

DATA
EASIN
115.69° W
33.00° N

Ocotillo Wells SVRA 2015

Land Ownership

- DPR
- BLM
- Private
- Study Area Boundary
- Major Roads



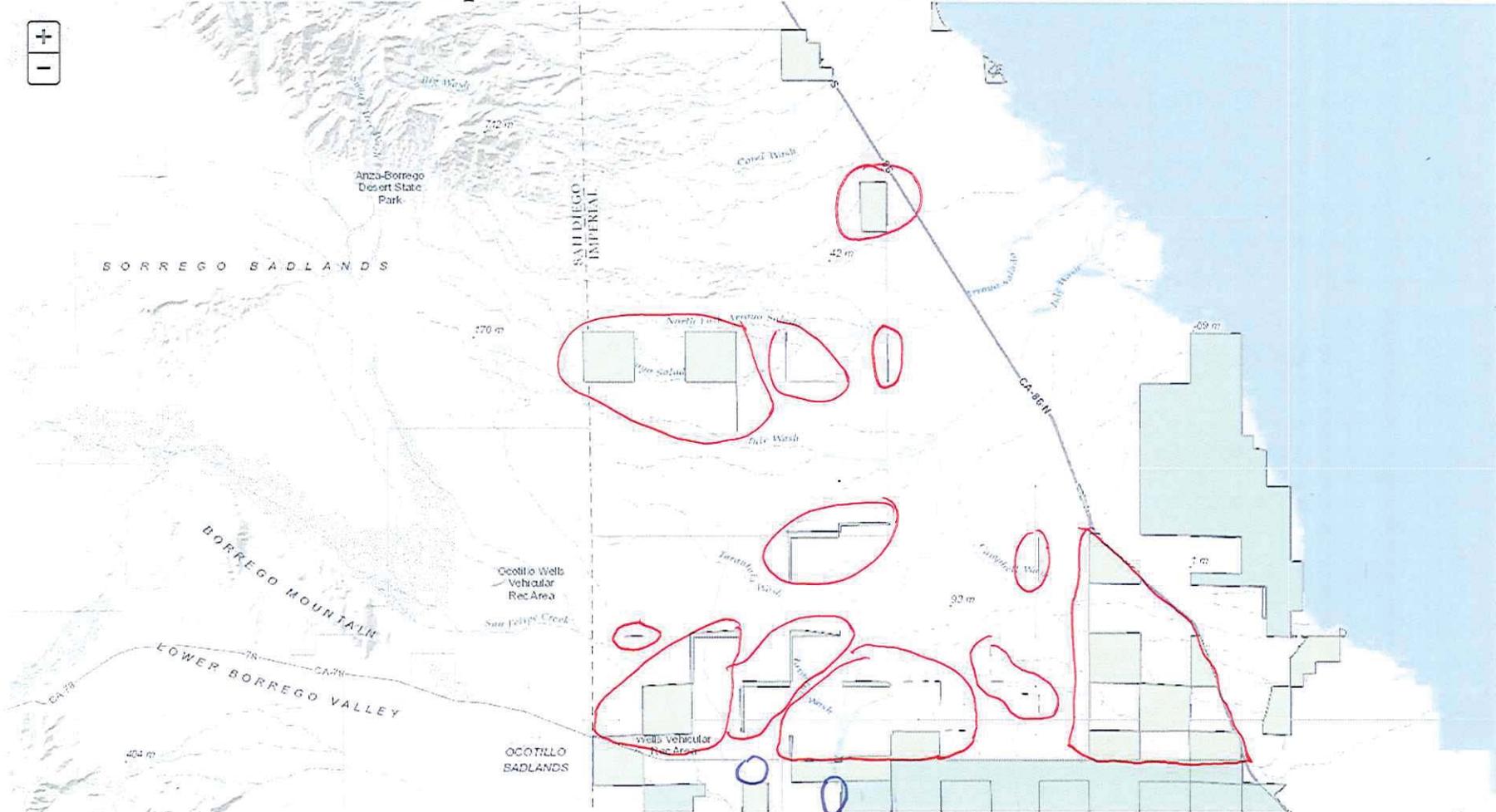


Sign Up



Support
Sign In

Legend



LONG: -116.18 | LAT: 33.29

Map Details
Layers

Follow Data Basin:



DRECP proposed ACEC and NLCS lands by alternative

- O Please move mapping errors for ACEC's in OW SURTA - we are in the process of acquiring these properties & they are also designated SRMA & managed under CA State Parks
- O Please ID as highest priority acquisition for mitigation as they provide connectivity between habitat in OW SURTA & BLM ACEC's