



VIA ELECTRONIC MAIL

October 8, 2015

State Director Jerome Perez
Tom Pogacnik, Deputy State Director for Resources
Mike Sintetos, Renewable Energy Program Manager
California State Office
Bureau of Land Management
2800 Cottage Way
Sacramento, CA 95825
jperez@blm.gov
tpogacni@blm.gov
msintetos@blm.gov

California Energy Commission

DOCKETED

09-RENEW EO-01

TN # 76205

OCT 08 2015

**Re: Conservation and the Proposed DFA North of the DTRNA in the West
Mojave Desert**

Dear State Director, Deputy State Director, and Renewable Energy Program Manager,

We are writing to follow up on recent conversations between Desert Tortoise Preserve Committee, Center for Biological Diversity and BLM regarding the Desert Renewable Energy Conservation Plan (“DRECP”) proposed Land Use Plan Amendments and conservation efforts both within and surrounding the Desert Tortoise Research Natural Area (“DTRNA”). We are pleased to hear that BLM will not be proposing any Development Focus Area (“DFA”) on public lands within the boundaries of the existing DTRNA in the Final Draft preferred alternative.

However, concerns remain that the proposed preferred alternative will still include a DFA on at least 6,000 acres of public lands just north of the DTRNA. (*See* 2015 DRECP Draft Preferred Alternative Map.¹) Notably, Alternative 1 does not include a DFA in this area.² The Center believes that the location of this portion of the proposed DFA on public lands is inappropriate as development of this area would significantly impact connectivity between several key existing conservation areas—Red Rock Canyon Desert State Park, the DTRNA, the Fremont-Kramer DWMA, and the Rand Mountain ACEC (which is proposed as NCL under the DRECP Preferred Alternative). As such, the proposed DFA in this location would undermine existing conservation. The Center urges the BLM not to designate a DFA on these lands.

¹ [http://www.drecp.org/maps/BLM_publiclands/2015_DRECP_Draft Preferred Alternative.pdf](http://www.drecp.org/maps/BLM_publiclands/2015_DRECP_Draft_PREFERRED_Alternative.pdf)

² The same area is included as DFA in Alternatives 3 and 4, and a far larger DFA that overlaps much of the DTRNA is included in Alternative 2.

In addition, a DFA in this area could undermine other existing and planned conservation efforts for the Desert Tortoise. Specifically, increasing connectivity from the DTRNA to Red Rock Canyon Desert State Park has been a long term goal of the Desert Tortoise Preserve Committee which manages the DTRNA.

The Center prepared the attached maps using layers from data basin which show the location of the lands in question. Map 1 shows the BLM lands north of the DTRNA (in grey); Map 2 shows the BLM's preferred alternative from the draft DRECP with those lands proposed for a DFA in grayish pink (the DFA pink color over the grey BLM lands); Map 3 shows BLM's Alternative 1 from the draft DRECP with those lands excluded from the DFA (in grey). As shown by the maps, preservation of the habitat on these lands is critical to protect the conservation values of the surrounding conservation lands including the DTRNA, Red Rock Canyon State Park, desert tortoise critical habitat, and existing and proposed ACEC/NLC lands. In contrast, designating these lands as a DFA could severely undermine the long-term viability of the desert tortoise populations and other imperiled species in the Western Mojave desert.

We urge the BLM not to designate these public lands north of the DTRNA as a DFA but instead to choose the Alternative 1 scenario in this area as part of the preferred alternative in the FEIS and the final decision.

Sincerely,



Heene Anderson
Senior Scientist/Desert Program Director
Center for Biological Diversity
8033 Sunset Blvd., #447
Los Angeles, CA 90046
323-654-5943
ianderson@biologicaldiversity.org



Lisa T. Belenky, Senior Attorney
Center for Biological Diversity
1212 Broadway, Suite 800
Oakland, CA 94612
Ofc: (510) 844-7107
Fax: (510) 844-7150
lbelenky@biologicaldiversity.org

Attachments:

Map 1: BLM lands north of DTRNA in grey

Map 2: BLM lands north of DTRNA in grey/pink from preferred alternative draft DRECP

Map 3: BLM lands north of DTRNA in grey from alternative 1 draft DRECP

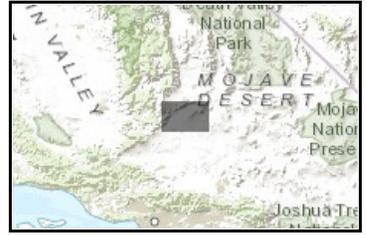
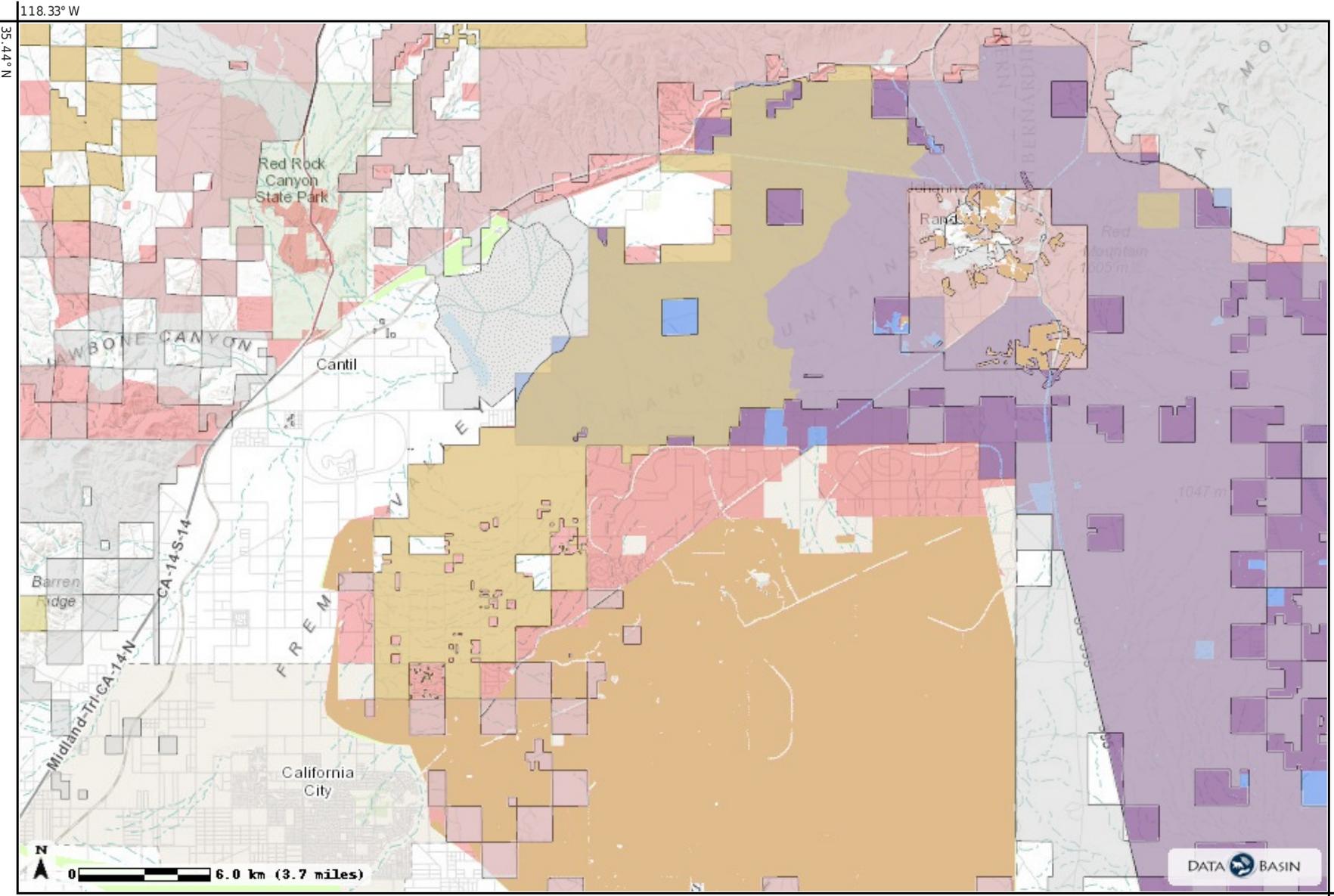
Map 1

Legend

BLM Lands, DRECP & CDCA

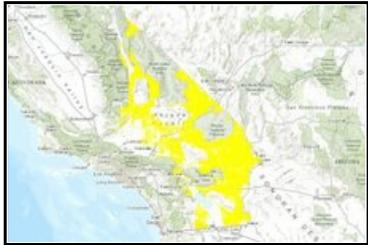
Reserve Design Envelope (NLCS) on BLM Land, Preferred Alt.

- National Landscape Conservation System
- Interagency Plan-wide Conservation Priority Area, Preferred Alt.
- Conservation Planning Areas, Preferred Alt.
- Desert tortoise critical habitat



Map Details

Datasets



BLM Lands, DRECP & CDCA
<http://drecp.databasin.org/datasets/bb04cdae394e439a88f3aa5bef5f501f>

Credits: BLM
Layers:

- BLM Lands, DRECP & CDCA



Reserve Design Envelope (NLCS) on BLM Land, Preferred Alt.
<http://drecp.databasin.org/datasets/885b974825ec45c5af7373cfc3ac44e3>

Credits: California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Dudek, DRAFT Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.
Layers:

- Reserve Design Envelope (NLCS) on BLM Land, Preferred Alt.



Interagency Plan-wide Conservation Priority Area, Preferred Alt.
<http://drecp.databasin.org/datasets/b306e2c8a4b1465bbffb2b0da9ec7729>

Credits: California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Dudek, DRAFT Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.
Layers:

- Interagency Plan-wide Conservation Priority Area, Preferred Alt.



Conservation Planning Areas, Preferred Alt.
<http://drecp.databasin.org/datasets/1586087ff9cf40dfad19c320ad595d94>

Credits: California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Dudek, DRAFT Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.
Layers:

- Conservation Planning Areas, Preferred Alt.



Desert tortoise critical habitat
<http://drecp.databasin.org/datasets/297c5c2b986c493eb3bc52825857d732>

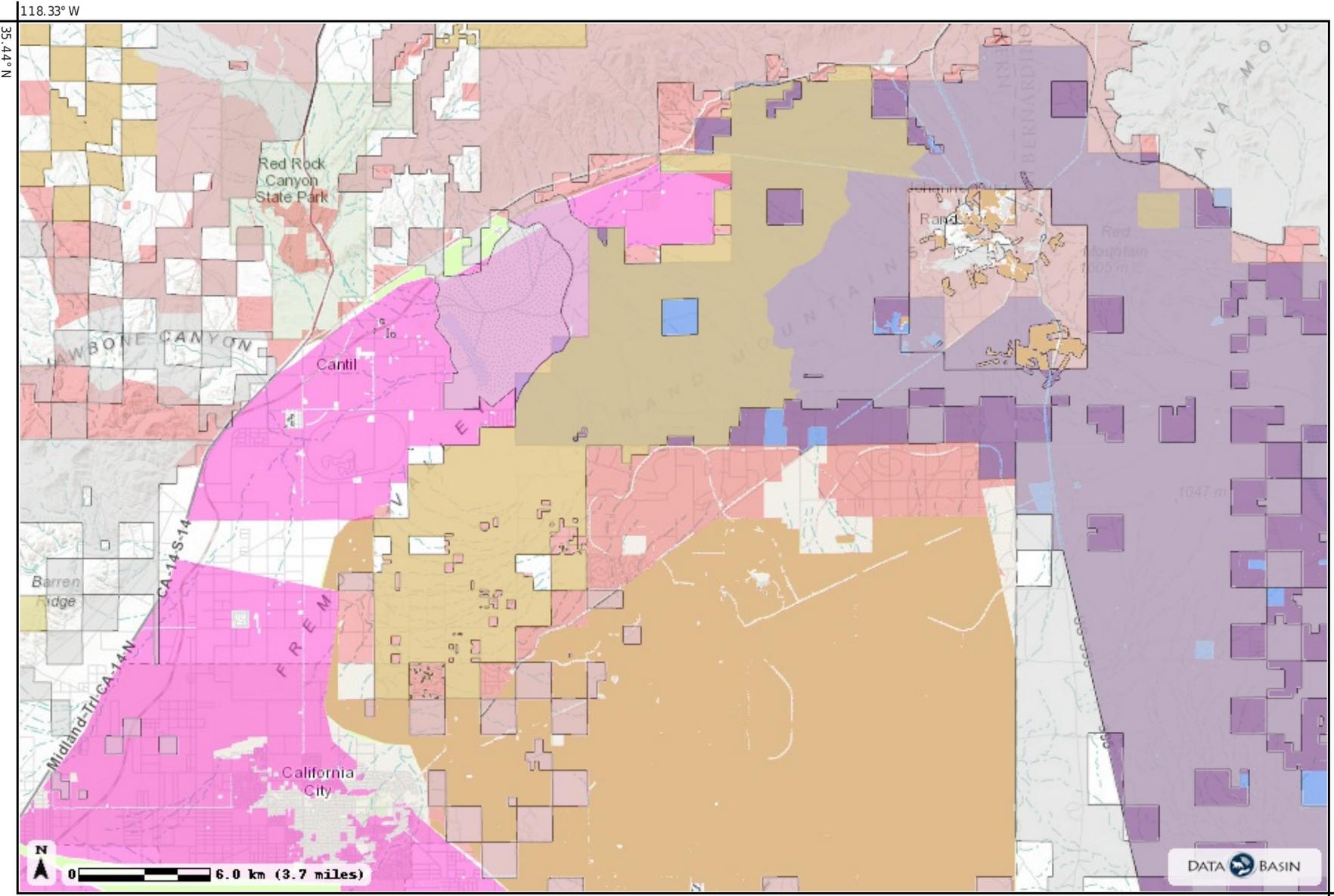
Credits: US Fish and Wildlife Service
Layers:

- layer1

Map 2

Legend

- BLM Lands, DRECP & CDCA
- Reserve Design Envelope (NLCS) on BLM Land, Preferred Alt.**
 - National Landscape Conservation System
 - Interagency Plan-wide Conservation Priority Area, Preferred Alt.
 - Conservation Planning Areas, Preferred Alt.
 - Development Focus Areas, Preferred Alt.
 - Desert tortoise critical habitat



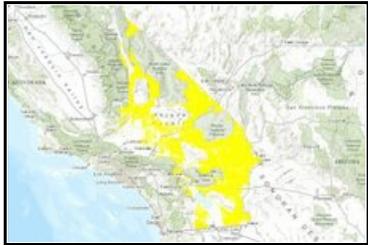
35.10° N

117.27° W



Map Details

Datasets



BLM Lands, DRECP & CDCA
<http://drecp.databasin.org/datasets/bb04cdae394e439a88f3aa5bef5f501f>

- Credits:** BLM
Layers:
 - BLM Lands, DRECP & CDCA



Reserve Design Envelope (NLCS) on BLM Land, Preferred Alt.
<http://drecp.databasin.org/datasets/885b974825ec45c5af7373cfc3ac44e3>

- Credits:** California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Dudek, DRAFT Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.
Layers:
 - Reserve Design Envelope (NLCS) on BLM Land, Preferred Alt.



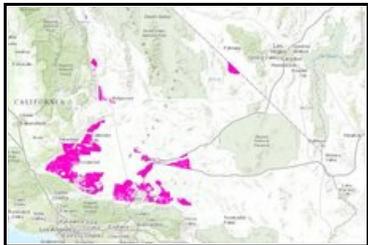
Interagency Plan-wide Conservation Priority Area, Preferred Alt.
<http://drecp.databasin.org/datasets/b306e2c8a4b1465bbffb2b0da9ec7729>

- Credits:** California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Dudek, DRAFT Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.
Layers:
 - Interagency Plan-wide Conservation Priority Area, Preferred Alt.



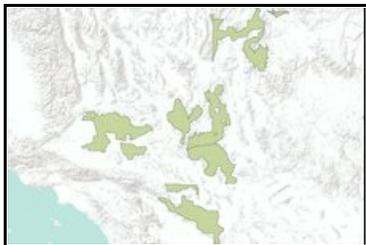
Conservation Planning Areas, Preferred Alt.
<http://drecp.databasin.org/datasets/1586087ff9cf40dfad19c320ad595d94>

- Credits:** California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Dudek, DRAFT Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.
Layers:
 - Conservation Planning Areas, Preferred Alt.



Development Focus Areas, Preferred Alt.
<http://drecp.databasin.org/datasets/c77425c9badf460b9bbcf80517bcf91f>

- Credits:** California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Dudek, DRAFT Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.
Layers:
 - Development Focus Areas, Preferred Alt.



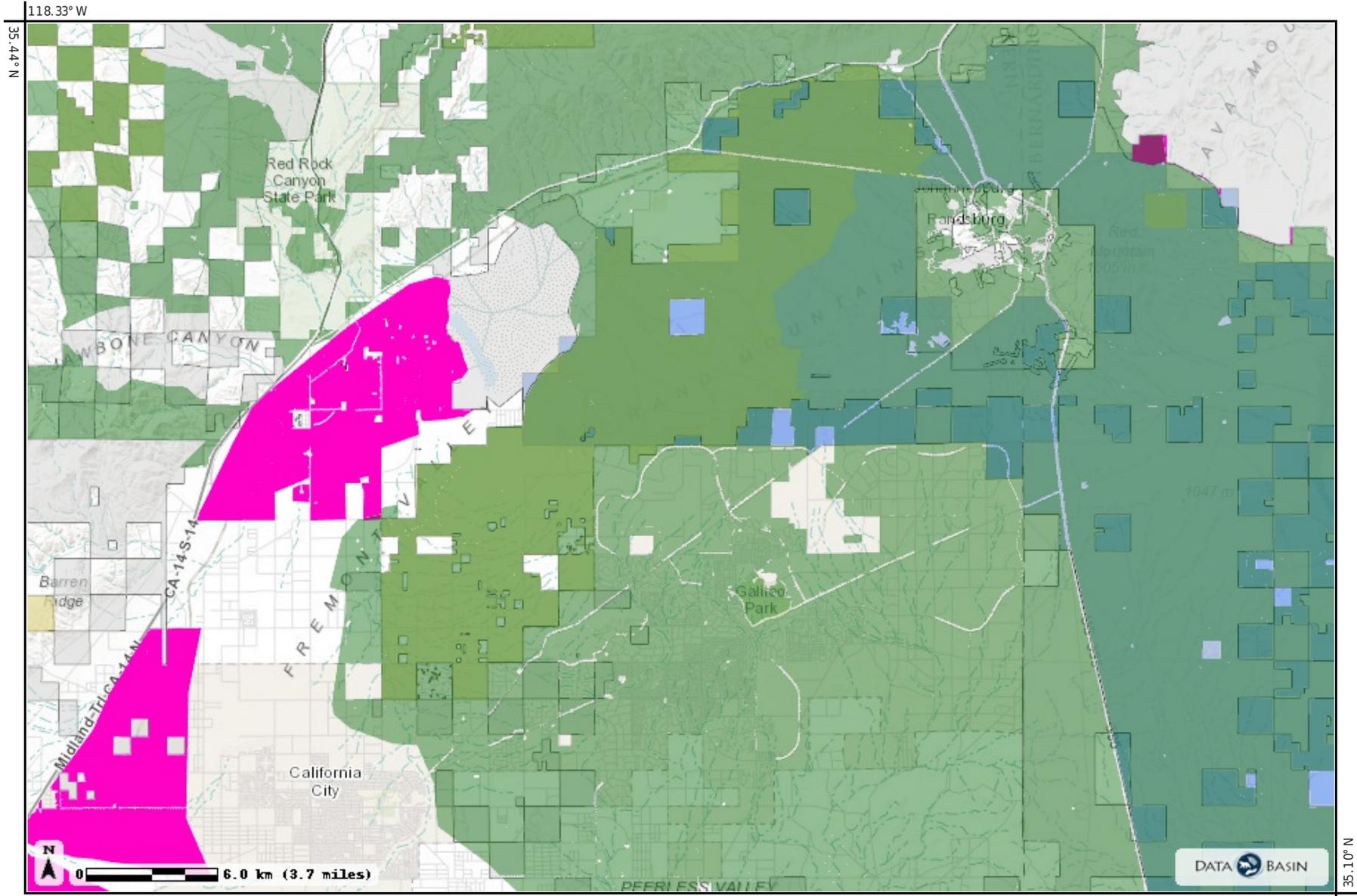
Desert tortoise critical habitat

<http://drecp.databasin.org/datasets/297c5c2b986c493eb3bc52825857d732>

Credits: US Fish and Wildlife Service

Layers: ● layer1

Map 3

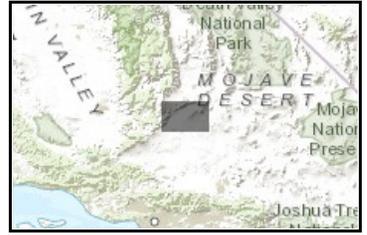


Legend

- Interagency Plan-wide Conservation Priority Area, Alt. 1
- Development Focus Areas, Alt. 1
- BLM Lands, DRECP & CDCA
- Reserve Design Envelope (NLCS) on BLM Land, Preferred Alt.**
- National Landscape Conservation System
- Desert tortoise critical habitat

118.33° W
35.44° N

117.27° W
35.10° N



DATA BASIN

0 6.0 km (3.7 miles)

Map Details

Datasets



Interagency Plan-wide Conservation Priority Area, Alt. 1

<http://drecp.databasin.org/datasets/3bb45cfb5354421cb4a8683950deb441>

Credits: California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Dudek, DRAFT Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.

Layers: ● Interagency Plan-wide Conservation Priority Area, Alt. 1

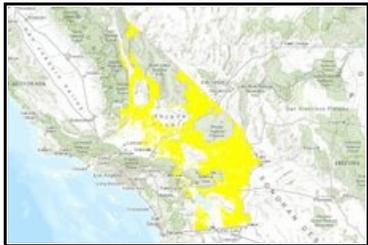


Development Focus Areas, Alt. 1

<http://drecp.databasin.org/datasets/90f369ea21bf4eac9adc62adc60d813c>

Credits: California Energy Commission, U.S. Bureau of Land Management, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Dudek, DRAFT Desert Renewable Energy Conservation Plan (DRECP) and EIR/EIS.

Layers: ● Development Focus Areas, Alt. 1



BLM Lands, DRECP & CDCA

<http://drecp.databasin.org/datasets/bb04cdae394e439a88f3aa5bef5f501f>

Credits: BLM

Layers: ● BLM Lands, DRECP & CDCA

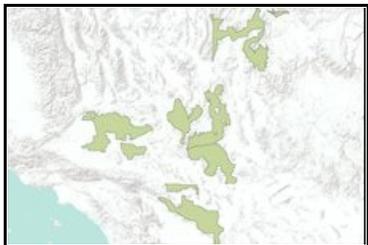


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Credits: US Fish and Wildlife Service

Layers: ● layer1