February 11, 2015

Shoshone Development, Inc.

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

Re: DRECP NEPA/CEQA

To Whom It May Concern:

I am the owner of Shoshone Development, Inc. My family has owned land in and around the Shoshone area and has resided in Shoshone for four generations. I am very concerned about our desert lands being developed with large-scale renewable energy projects. I would rather see renewable energy projects being built in urban areas. Unfortunately, I recognize that renewable energy companies have been applying, and will continue to apply, to develop more and more of our public desert lands.

I therefore appreciate that the Bureau of Land Management, along with the CCC and other agencies, has issued the Desert Renewable Energy Conservation Plan, to attempt to identify areas where energy development in our deserts may be less harmful to plants, wildlife, scenery, recreation and other values, while also identifying places that should not be developed. Thank you for including many important areas in National Conservation Lands in the Preferred Alternative, such as Afton Canyon, Amargosa River region, Chenehues Valley, Chicago Valley, Chuckwalla Bench, Dublin Hills, Indian Pass/Milpitas Wash, Middle Knoe, Mojave Trails/Route 66, Panamint Valley, Shadow Valley, Ship Mountains, and Upper McCoy Valley.

However, there are many special places in our deserts that the DRECP does not go far enough to protect from renewable energy development. I ask the BLM to improve the Preferred Alternative of the DRECP by including the following places, in their entirety, in BOTH Areas of Critical Environmental Concern and National Conservation Lands:

- Argos (Rte. 66)
- Ash Hill (Rte. 66)
- Avawatz Mountains area (including the “Bowling Alley”)
- Big Maria Mountains and surrounding flats
- Bristol Lake area
- Cadiz Valley/Iron Mountains
- California Valley (including Charleston View)

P.O. Box 67 - Shoshone, CA 92384
- Coto Range area
- Danby Lake area
- Lower Centennial Flat
- Malpais Mesa area (including northwestern Tec Cty Hills, Santa Rosa Flat, Conglomerate Mesa)
- Mule Mountains
- Orocopia Mountains area
- Palero Lake
- Panamint Valley (including Knight, Osborne, and Snow Canyons and Wildrose Wash)
- Pinto Mountains area
- Ragtoe (Rte. 66)
- Red Mountain
- Riverside Mountains area
- Rodman Mountains area
- Rose Valley/McCloud Flat
- Sacramento Mountains
- Silurian Valley
- Slate Range
- Sperry Hills/Kingston Range
- Valley Mountain
- Vidal
- Whipple Mountains area

I also ask the BLM to make the following changes to the Preferred Alternative:

- Recommend to Congress that it make National Conservation Lands off limits to new mining and mineral leases, with the exception of small-scale rockhounding activities;
- Designate National Conservation Lands as either Visual Resource Management Class I or II, so that approved activities will only cause limited changes to landscape character; and
- Retain Areas of Critical Environmental Concern within National Conservation Lands (instead of removing that special management designation), so that there will be an added layer of protection for more specific values within these areas.

Thank you,

Susan Sorrells

P. O. Box 67 - Shoshone, CA 92384
Response to Comment Letter E22

Shoshone Development, Inc.
Susan Sorrells
February 11, 2015

E22-1 Thank you for your comment. No response is required.

E22-2 The BLM has identified those areas that best meet the criteria for conservation and inclusion as National Conservation Lands. Several areas have been modified or expanded from the Draft DRECP and the National Conservation Lands will be reflected in the Proposed LUPA and Final EIS. In order for the BLM to consider your request, you would need to provide specific descriptions and rationale as to how the lands you propose for inclusion in the NLCS meet the criteria for NLCS lands.

E22-3 The BLM will develop a priority list of National Conservation Lands that may be considered for segregation and possible withdrawal from entry under the public land mining laws. However, valid existing rights will be honored in all cases.

E22-4 The BLM has assigned the complete range of VRM classes to parts of the proposed National Conservation Lands because their interspersed placement at times lies adjacent to lands with other management direction or uses. Where National Conservation Land units are large or contiguous with existing National Conservation Lands units, wilderness, wilderness study areas (WSAs), other NLCS units, or adjacent National Park units, VRM Class I and II generally apply.

E22-5 Where ACEC and National Conservation Lands designations overlap, the BLM will follow the guidance under FLPMA to protect the relevance and importance values of the ACEC, regardless of National Conservation Land designations. The DRECP will clearly show the boundaries of each ACEC, even where they may be within, or overlap, a National Conservation Land unit.