February 19, 2015

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:

The California Wilderness Coalition (CalWild) is a nonprofit public benefit corporation organized under the laws of the State of California in 1976 and composed of conservation organizations, businesses and individual members. CalWild is based in Oakland and it has field staff based in Humboldt, Los Angeles, Sacramento and Ventura counties. Through advocacy and public education, CalWild builds support for the protection of California’s wildest remaining places, primarily those managed by the federal government.

In furtherance of our mission, we join with the Amargosa Conservancy in requesting that the final version of the Desert Renewable Energy Conservation Plan (DRECP) include the following portions of the Amargosa River watershed in the National Landscape Conservation System (these lands are described in more detail in the letter that the Amargosa Conservancy will be submitting on the Draft DRECP).

**Southern Amargosa Desert**

This area harbors a vast array of unique and endemic life. The eastern portion of this area, Carson Slough, is habitat for the federally endangered Amargosa kit fox, and the federally threatened Ash Meadows gumplant.

**Middle Amargosa Basin**

The Middle Amargosa Basin is the beating heart of the Amargosa region. It harbors an abundance of rare and endemic life, including numerous threatened and endangered species such as the least Bell’s vireo, Shoshone pupfish, Amargosa pupfish, and the critically endangered Amargosa vole.
Chicago Valley
The defining element of the proposed National Conservation Lands in the Chicago Valley is mesquite bosque. This habitat is rich in wildlife, important to migratory and resident birds, and holds a treasure trove of archaeological resources.

California Valley/Charleston View
The California Valley provides a vital habitat connection between the Nopah Range and the Kingston Range. Perhaps most vitally, it provides a critical hydrological link in the Amargosa watershed. The Kingston Range, the highest peaks in the immediate area, receives significantly more precipitation than the surrounding desert. It is estimated that as much as 10 percent of the surface flow of the Amargosa results from rain and snowmelt from the Kingston Range.

Silurian Valley
This area is important habitat for the desert tortoise and burrowing owl and foraging ground for the golden eagle. The Valley is one of the finest remaining examples of a fairly undisturbed desert landscape.

Silurian Hills, Turquoise Mountain
These areas provide important bat habitat, and the Silurian Hills have been designated as a Bat Conservation Area by BLM.

Shadow Valley
Shadow Valley contains a northward extension of the famous Cima Dome pygmy Joshua tree forest, a relatively rare ecosystem. It harbors dense populations of desert tortoise. The southern portion of Shadow Valley is part of the Ivanpah Desert Wildlife Management Area, an area where tortoise conservation has been prioritized.

Regardless of which DRECP alternative or which combination of alternatives the BLM decides to proceed with, we urge the agency to include all seven portions of the Amargosa watershed described above in the National Landscape Conservation System. These landscapes epitomize the values for which National Conservation Lands were established in the first place.

Thank you for your consideration.

Sincerely,

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Response to Comment Letter E57

California Wilderness Coalition
Ryan Henson
February 19, 2015

E57-1 Thank you for your comment. Based on additional analysis and public comments, the BLM has considered these lands as additions to the National Landscape Conservation System in the Proposed LUPA and Final EIS. Only public lands managed by the BLM will be considered as National Conservation Lands.

E57-2 See response E57-1.

E57-3 See response E57-1.

E57-4 See response E57-1.

E57-5 See response E57-1.

E57-6 See response E57-1.

E57-7 See response E57-1.

E57-8 See response E57-1.

E57-9 See response E57-1.
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