

Director (210)

Attn: Protest Coordinator

PO Box 71383

Washington, DC 20024-1383

December 15, 2015

RE: Desert Renewable Energy Conservation Plan

Friends of the Inyo is a locally-based nonprofit conservation organization dedicated to the stewardship, exploration, and preservation of the Eastern Sierra’s public lands and wildlife. Over our 29 year history, Friends of the Inyo has become an active partner with the Bishop and Ridgecrest Field Offices of the BLM, the National Park Service, and other public lands agencies in the California Desert. Friends of the Inyo actively engages in renewable energy issues in the Eastern Sierra including Inyo County’s Renewable Energy General Plan Amendment (REGPA)[[1]](#footnote-1), for which we submitted comments on the Program Environmental Impact Report on Jan 14, 2015. Our DRECP comment letter was submitted February 16, 2015. We thank the DRECP team for including many of our recommendations to the National Landscape Conservation System (NLCS) in the preferred alternative.

Friends of the Inyo is particularly interested in preserving the scenic, recreational, ecological, and cultural values of the Owens Valley, an iconic landscape within the DRECP plan area but outside of the California Desert Conservation Area (CDCA). The current acreage of Unallocated Lands in the Owens Valley is troubling. Secondly, we urge the BLM to reconsider the classification of Unallocated Lands outside the Owens Valley that should be NLCS because of their national significant values. Thirdly, we are concerned with the footprint of the current Rose Valley Development Focus Area (DFA).

**Owens Valley Unallocated Lands**

We thank the DRECP for removing Inyo County variance lands in the Owens Valley. Aligned with our past request to expand the proposed Conservation Planning Area (CPA) northward to encompass the rest of the Owens Valley, we request all Unallocated Lands within the Owens Valley be removed from developmentto protect the valley’s many scenic, cultural, and biological values. It is generally understood that if Owens Valley was in the CDCA all BLM lands there would be designated NLCS due to nationally significant cultural, scenic, and ecological values.BLM should include a simple policy statement to accompany this category of lands that closes them to future development. Currently Unallocated Lands are written as “open” which sends the wrong message these lands should be considered for development. Some of these lands may not meet NLCS or ACEC criteria, but still should not be considered for development. In the future, if all DFAs are developed, and there is still a need to meet renewable energy goals, these lands could be reconsidered for potential development with a Plan Amendment (PA). Currently in the Owens Valley, BLM lands don’t require a PA. The DRECP could offer a level of protection for the Owens Valley, since currently the Bishop Field Office Resource Management Plan affords no protection for renewable energy development. The valley contains vital wildlife habitat with deer and elk calving and migration areas as well as extensive riparian habitat. BLM lands provide transitional habitat between the Owens Valley floor and other federal protected lands in the White/Inyo Mountains and Sierra Nevada. Irreplaceable cultural sites cover most of the valley. The Owens Valley is particularly vulnerable to potential future development because it is transmission-aligned, one of the criteria for development considerations on Unallocated Lands.

**Other Unallocated Lands**

Other areas of importance in Inyo County include Deep Springs Valley. We thank the BLM for proposing lands north of Hwy 168 for NLCS classification including Antelope and Cuna springs. Closing these lands to development will help protect resident isolated populations of Black Toad, a California Fully Protected species. We are unsure why the lands to the south of 168 remain unallocated. Toad populations exist around the lakebed and the small dune systems to the north of the Deep Spring Lake contain an endemic species of beetle discovered in the early 2000’s. The BLM has a Black Toad ACEC here (and previously a 1987 WHMA designation) in order to create connectivity around the lake. In order to properly address toad connectivity, all lands in the Deep Springs area should be NLCS because of these existing designations and the BLM intent to provide habitat connectivity.

We request the unallocated lands north of highway 190 and south of the Saline Valley Road, an area known as Lower Centennial Flat, be changed to the NLCS classification. The area is surrounded by proposed NLCS and existing wilderness, indicating the area’s nationally significant values. Namely, this region is a Joshua tree recruitment area, has substantial Mohave Ground Squirrel habitat, and offers fantastic primitive recreation in an intact desert ecosystem with much plant and bird diversity. The area known as Lee Flat north of highway 190 also contains an isolated population of Bendire’s Thrasher, a rare species this far west and north in California.

**Rose Valley DFA**

It appears there has been little to no coordination with Inyo County on designations or DFAs in the FEIS. Consultation with Inyo County and consideration of the County’s REGPA are very important. Regarding the Rose Valley DFA, recommendations made to the CEC were for a much smaller footprint on disturbed lands. The current DFA will have unavoidable impacts on available groundwater supplies. Secondly, the area also falls almost entirely within Mohave Ground Squirrel (MGS) habitat and borders what would be an ideal MGS Conservation Area. Preserving key MGS connectivity habitat northward and upslope as this species adapts to climate change is very important. The current DFA boundary is contrary to the DRECPs goals to identify wildlife corridors and connectivity areas. Thirdly, Rose Valley has numerous irreplaceable cultural sites as described in many of the DRECP comment letters, including our own. We request the Rose Valley DFA boundary be modified to match the footprint of the REGPA SEDA, which occurs mostly on previously disturbed lands and minimizes impacts to MGS habitat and cultural sites.

We respectfully ask the BLM to improve the preferred alternative by reducing the acreage of Unallocated Lands in the Owens Valley and western Inyo County and scaling back the footprint of the Rose Valley DFA to align with the County’s proposed SEDA footprint. We thank the DRECP and BLM staff for their work on the FEIS and look forward to receiving the agency’s response to our concerns.

Sincerely,

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1. http://www.inyoplanning.org/projects/documents/DRAFTProgramEnvironmentalImpactReport-InyoCountyRenewableEnergyGeneralPlanAmendment.pdf [↑](#footnote-ref-1)