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Date: 1/27/2010 3:19 PM
Subject: National Park Service, Pacific West Region, Comments on the Best Management Practices and Guidance Manual

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National Park Service
Pacific West Region
1111 Jackson Street, Suite 700
Oakland, California 94607-4807

DOCKET	
09-RENEW EO-1	
DATE	JAN 27 2010
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L1425 (PWR-LP)

January 27, 2010

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

Subject: National Park Service, Pacific West Region, Comments on the Best Management Practices and Guidance Manual

Dear Sir/Madam:

Thank you for the opportunity to comment on this Best Management Practices (BMP) and Guidance Manual. The National Park Service is a strong supporter of the development and use of renewable energy sources that reduce our carbon footprint and maximize efficient use of available energy resources.

GENERAL COMMENTS

Throughout this document there is no mention of protected areas and avoiding impacts to these protected areas by adjacent development. The Organic Act of 1916 mandated a high standard of protection for the parks. The overall approach for site review should include protocol to ensure potential effects on units of the National Park System and other protected areas are fully assessed by an applicant and require that projects be designed to avoid and mitigate effects on park resources.

In the Desert Region Boundary from page 9 of this document, the National Park Service manages 5.7 million acres of land within the Mojave Desert. This does not include state Parks, State Reserves, and other protected areas such as designated and proposed wilderness within the desert boundary that have legislative protection. This manual should outline these areas and all associated protection requirements to minimize direct and indirect impacts. The document also does not mention the important aspects or adequate protection of wildlife corridors. This cause of habitat fragmentation and connectivity issues are critical to natural areas and may be critical in light of our current understanding of global climate change. No discussion or mention is made of the elimination of large areas of sensitive desert habitat and what the outcome might be to not only sensitive desert species but even more common species that occupy these areas. Many species such as mountain bighorn sheep already suffer from habitat fragmentation from current desert development, with many subpopulations in genetic jeopardy. At every opportunity we should consider these extremely important values to the ecological health of the desert. Many of these species require large home range areas that can exceed several square miles to survive.

The protection of the Threatened Desert Tortoise and its entire habitat require more consideration. Stressing recovery criteria and the ultimate protection of this habitat should be addressed as a significantly higher priority. The Recovery Plan continues to highlight the development in desert tortoise habitat as the highest threat to the tortoise and that mitigation for the loss of habitat has not been successful in slowing the decline of this species. This manual cannot just reiterate permit stipulation it needs to outline large areas of habitat that need additional protection, augmenting Desert Wildlife Management Areas (DWMA). More development and loss of habitat are going to jeopardize successful recovery efforts.

Natural Dark is a natural resource that should have its own section for Best Management Practices and how to protect any further loss of this resource from development. Not only for the protection of solitude in the desert but to maintain a healthy ecosystem for all the species that require natural dark in their lifecycles. For example, if lighting is needed to complete energy production at night, it should require full shielded fixtures with low temperature (below 3200K), bulbs. Smart lighting controls and motion sensors should be utilized to prevent unnecessary operation.

Additional visual resource measures need to be considered as best management practices for this desert region. Many planning documents throughout the region have elements to preserve local sceneries and vistas. Development can easily change the character of protected wilderness areas and severely impact critical solitude and open space qualities. Many cultural resource features include undeveloped open space that has not changed character since it was originally settled. We need to require more than just offering permit stipulations as (BMP) and challenge the development to conform to areas that minimize affect and impacts to all

aspects of visual resources.

SPECIFIC COMMENTS

Page 3, line 28: This should include National Park Service units including any resources on public land that are in conflict with development.

Page 7, line 17-20: Suggest that working cooperatively with the National Park Service be added. We are an agency of the Department of Interior however; we do not share a multiple use mission with the BLM. At times conflict exists working with the authorities of other federal agencies on the use of land especially near our boundaries.

Page 16, line 15: see #1 and suggest that if a proposed project is within 5-10 miles of a national Park Service unit that notification and discussions with that unit be completed in the beginning of the process to work out conflict early.

Page 23, line 1: Suggest that complete lifecycle emissions be accounted for. These energy companies are promoting these projects to the public as a "green" source of energy without considering all the resources including emissions for producing the mirrors etc.

Page 38: No mention of the Desert Tortoise Recovery Plan Revision that the FWS has been working on the past several years and that will be final in 2010. Recovery criterion need to be discussed to minimize habitat loss. This is critically important because relocation efforts as mitigation have really not been very successful. Desert Tortoise and Desert Tortoise habitat need to be considered a high priority.

Page 62, line 24: Potential impacts need to be extended to include National Parks and other protected areas, e.g. 25 miles in our desert environment for a buffer for these protected areas.

Page 64, line 4: This section should be moved under the Natural Dark heading that was mentioned earlier.

We thank you for this opportunity to provide comments. If you would require additional information or discussion, please contact Mr. Larry Whalon, Deputy Superintendent, Mojave National Preserve, at (760-252-6109 or Mr. David Reynolds, Supervisory Realty Specialist, at (510) 817-1425.

/s/ Rory D. Westberg
(signed original on file)

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Acting Regional Director, Pacific West Region

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