**LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCIATION (LVEDA)**

**VIA EMAIL (BLM\_CA\_DRECP@blm.gov)**

To: Mr. Jerome E. Perez

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Date: 3/22/18

**Re:** **DRECP REVIEW**: **“Notice of Intent to Amend the California Desert Conservation Area, Bakersfield, and Bishop Resource Management Plans and Prepare Associated Environmental Impact Statements or Environmental Assessments,” issued by the Bureau of Land Management on February 2, 2018**

Introduction:

In lieu of a total re-opening of the DRECP – we prefer amendments and adjustments – plus precise interpretations of what the original DRECP really meant so we (especially BLM) know how to implement it.

(Mr. Perez: Katrina introduced us at a lunch in Lucerne Valley over a year ago. Some of the following is as much ‘operational BLM’ than it is ‘DRECP’. We need your help. Let us know when you are in the area).

Renewable Energy:

We do not support opening up the entire DRECP to allow industrial solar/wind projects on sensitive BLM lands – especially where there is no or minimal transmission infrastructure. The utilities and CPUC all agree that no additional solar “procurement” is necessary until @ 2030. The desert has been violated enough with these projects. Roof-top/parking lot/backyard solar can fulfill the remaining objectives – and not just in the desert. All of s. Calif. has plenty of sunshine and it needs to ‘pay its way’ – not rely on public lands.

Development Focus Areas:

Lucerne Valley is inundated with BLM DFAs that need to be removed – including the 1200 acres recently filed on by “Lend Lease Solar”. These parcels are within an established (Severely Economically Disadvantaged) community where such projects will destroy our land-use integrity, custom and culture – and provide no economic benefit whatsoever – not even increased assessed values and thus no increased property tax revenue. Not to mention exacerbate our current fugitive dust events - with background PM 10/2.5 levels - significantly exceeding standards. Wind erosion from these projects cannot be mitigated. We and downwind receptors will suffer additional health impacts from any increased ambient particulates. The DRECP must deal with cumulative impacts from its potential projects on DFAs in tandem with all the solar applications on private and State School Lands.

MOU between BLM and San Bernardino County:

When private lands were deleted from the original DRECP – DRECP participants agreed to a MOU with San Bernardino County that would align/coordinate DRECP’s BLM DFAs with the County’s Renewable Energy and Conversation Element’s (RECE) land-use designations and restrictions re: the placement of solar projects on private parcels under the County’s jurisdiction. The County’s RECE has been approved – albeit without restrictions advocated by local communities – but it is nevertheless still “County policy” with specific siting requirements. So how did BLM allow “Lend Lease Solar” to apply for 1200 acres of solar on BLM DFA lands in Lucerne Valley w/o said consultation with the County as required by the MOU?

BLM/State School Lands Exchanges:

We are in the process of working with our local State Senate and Assembly reps. to arrange a meeting with State Lands and BLM staff in an attempt to work out a land exchange where the State can obtain BLM parcels with no habitat values - adjacent to urban areas with transmission lines and infrastructure more amenable for economically viable solar and other projects that can provide revenue to the State Teacher’s fund. And: Where said projects won’t be a fight – like the State School lands in Lucerne Valley and Johnson Valley currently designated for solar projects in the current DRECP. We need BLM support in this effort – a win/win for all parties.

Disturbance Caps:

We need concise and universal rules for determining what projects fall within the ‘caps’ within ACEC’s. The primary environmental objective of a particular ACEC should be reflected in how the cap is applied – or whether exempted. Any short-term disturbance from a project intended and designed for improving habitat, restoration, maintenance of existing or creation of new wildlife water sources, etc. - should be exempt from the cap.

OHV Use:

No additional Mojave Desert areas should be dedicated to “open” OHV use. We have plenty as is. Emphasis needs to be on BLM dealing with illegal OHV use (trespass) on ACECs and Limited Use areas – especially the Ord Mt. ACEC that is getting hammered from heavy OHV use from vehicles crossing west of Camprock Rd. from the Johnson Valley Open Area (one of if not the largest in the United States with plenty of room for unrestricted use). Said ACEC is becoming a de facto ‘Open Use” area – just another BLM failure and travesty. Barstow BLM has been notified – no action taken.

Oil/Gas resources:

Forget it. None here.

Mining:

When and if (mostly when) our dependence on foreign sources of minerals – especially rare earths – jeopardizes our economic and financial well-being – the DRECP needs an expedited process to allow entry to mine said critical minerals – where potential sources have been (or might have been) locked up in the current DRECP.

Grazing Allotment Leases:

This is an opportunity to clear up the confusion and inaction re: what former grazing leases are still viable and available for lease vs. those that have been “fully” relinquished via Fort Irwin etc. compensation actions. Those that are still available need to be leased out and operated – especially where cattle grazing can help prevent range fires.

Town of Apple Valley HCP:

We fully support the Town’s Habitat Conservation Plan and its wildlife corridors within Lucerne Valley. Nothing should be done to interfere with the integrity of said Plan.