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09-RENEW EO-1
DATE SEP 13 2011
RECD. SEP 29 2011

Preserving America's Heritage

September 13, 2011

Mr. Jim Bartel
Field Supervisor, Carlsbad Fish and Wildlife Office
U.S. Fish and Wildlife Service
6010 Hidden Valley Road, Suite 101
Carlsbad, CA 92011

Dear Mr. Bartel:

It has come to our attention that the United States Fish and Wildlife Service (FWS) is working with a California state agency to establish priority areas in the California desert for renewable energy development through the Desert Renewable Energy Conservation Plan (DRECP). We understand that evaluation of sites under the National Environmental Policy Act (NEPA) is ongoing, in order to identify appropriate areas for renewable energy development. In order to take into account effects on historic properties, it is important that the FWS also evaluate potential sites in accordance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, "Protection of Historic Properties" (36 CFR 800).

The NHPA's Section 106 process is designed to take effects on historic properties into account and encourages federal agencies to coordinate NEPA compliance with Section 106. While the NEPA process may result in the identification of areas with the fewest impacts to natural resources, it is also important to consider the potential effect of energy development in these areas on historic properties. Identification of "priority areas" for renewable energy projects implies that the agency has considered potential impacts to historic properties and determined that the selection of these areas was made with a balanced review of all potential environmental impacts, including those that may occur to historic properties. Therefore, it is vital that evaluation of historic properties, as well as natural resources, be undertaken early in the process to identify priority areas.

We understand that a Cultural Resource Committee has been established to address the consideration of historic properties within the DRECP. Because of the importance of this committee's work, we would appreciate further information on the mission of the committee, their role in the process of identifying priority areas and the anticipated outcomes of their work. We recommend that the committee contact the California State Historic Preservation Officer (SHPO), to apprise him of the status of the DRECP and to seek guidance regarding historic properties. Given our experience working with renewable energy development projects nationwide and our participation in such initiatives as the President's Renewable Energy Rapid Response Team, we also offer our assistance to this committee and would welcome the opportunity to participate in their work, as appropriate.

ADVISORY COUNCIL ON HISTORIC PRESERVATION
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We look forward to your response and to working with your agency, the California SHPO, Indian tribes, and other consulting parties to address the effects of the development and implementation of the DRECP on historic properties within the California desert. Our participation in this matter is being handled by Nancy J. Brown, ACHP liaison to the BLM, who can be reached at 202.606-8582 or nbrown@achp.gov.

Sincerely,

Reid J. Nelson
Director
Office of Federal Agency Programs