

## Energy - Docket Optical System

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**From:** Ray Butler <rwbutler338@att.net>  
**Sent:** Monday, February 23, 2015 4:27 PM  
**To:** Energy - Docket Optical System  
**Subject:** drecp nepa/ceqa

California Energy Commission

**DOCKETED**

**09-RENEW EO-1**

TN # 75114

FEB 23 2015

Dear DRECP Preparers:

I have reviewed all the Alternatives in the current proposal. I am extremely concerned that in every case, there is little or no recognition of areas in the California deserts that currently have special land-use designations to protect unique resource attributes. These would include Area(s) of Critical Environmental Concern (ACECs) on federal lands as well as numerous parcels of land acquired by the State of California to mitigate for CEQA-determined impacts of projects in the deserts over past decades. Many ACEC designations involved extensive public involvement and careful consideration to balance land-use with multiple-use principals as required by U. S. Congressional directives and reflected in the National Land Management Policy Act of 1970. As a life-long, native Californian, previous member and chair of the Bureau of Land Management's (BLM) California Desert District Advisory Council, an appointee to the steering committee for Governor Wilson's Sierra Summit ecosystem study efforts, and a current policy advisor to a county government, I find this failure totally unacceptable.

As one of the most egregious examples I would point out the Desert Tortoise Research Natural Area in Kern County which has had special protective designation since 1973. Under ALL proposed DRECP Alternatives there is no recognition of these special protections, Further, the DRECP would seem to replace many provisions of the current BLM West Mojave Management Plan (WEMO) including many future adaptive management strategies of that plan. Essentially, DRECP will replace the WEMO as well as many other land-use policies and designations already in place across the California desert to the detriment of many resources.

I ask that the DRECP be redrawn to recognize all ACECs, the Desert Tortoise Research Natural Area, and all CEQA-acquired mitigation lands under the administration of the State of California.

Respectfully submitted,

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