

DRECP NEPA/CEQA

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Sent: Monday, December 08, 2014 12:35 PM**To:** Energy - Docket Optical System**Attachments:** DRECP.docx (17 KB)

California Energy Commission

DOCKETED**09-RENEW EO-1**

TN # 74151

DEC 08 2014

Re: DRECP NEPA/CEQA

To Whom It May Concern:

Pursuant to your notice for public comment I submit the following to help you identify relevant issues that will determine the scope, including alternatives, regarding The Desert Renewable Energy Conservation Plan (DRECP).

I urge you to consider other alternatives, such as roof top solar and intercity alternative energy development and to remove sensitive rural lands and pristine stunning public lands from consideration.

I urge you to consider the consequences of development on sensitive open desert lands and how it will adversely affect the environment and the quality of life of the residents and visitors. Wildlife corridors between habitats are critical to the wildlife ecosystems and irreparable harm could be devastating to the wildlife in the area. Many of the areas of focus are near or adjacent to National Parks lands and will have an adverse effect on the quality and environment of those lands and the public that visit.

I submit the following for your consideration:

1. Identify facts and evaluate alternatives that will provide public multiple use, protect scenic, historical and environmental quality, and provide outdoor recreation and as defined by FLPMA : 7) *goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law; (8) the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use; (9) the United States receive fair market value of the use of the public lands and their resources unless otherwise provided for by statute;*
2. Evaluate the significant of impacts on the **local community** as used in NEPA requires considerations of both context and intensity per CFR 1508.27: (a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the local rather than in the world as a whole. Both short- and long-term effects are relevant.

3. Evaluate **severity** of any impacts per CFR 1508.27:
 - A. Unique characteristics of the geographic area;
 - B. The degree to which the effects on the quality of the human environment are likely to be highly controversial;
 - C. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks;
 - D. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration;
 - E. Whether the action is related to other actions with individually insignificant but **cumulatively significant impacts**. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

4. Compare and evaluate the benefits and adverse effects to achieve **environmental justice**. Is the exchange likely to affect human or community health or welfare?
 - a. Community cohesion and identity for traditions use of the land.
 - b. Social institutions such as hiking clubs and outdoor use organizations
 - c. Cultural identity and associations?

Agencies should recognize the interrelated cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed agency action. These factors should include the physical sensitivity of the community or population to particular impacts; the effect of any disruption on the community structure associated with the proposed action; and the nature and degree of impact on the physical and social structure of the community(Executive Order 12898 and NEPA).

5. Identify **alternatives** available to mitigate the environmental concerns that have been identified.

Thank you for your careful consideration of the facts and issues of these important matters of mutual concern regarding our national public lands for which you have been entrusted with stewardship.

Thank you for keeping me informed of any decisions or actions related to this matter.

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Attached is a copy of my letter.