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California Energy Commission

DOCKETED

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TN # 74560

FEB 19 2015

18 February 2015

RE: Comments on Draft EIR/EIS for DRECP

Dear Mr. Beal,

My comments are as follows:

- Given that only 24,593 acres of renewable energy have been developed on five BLM parcels to date, I believe the No Action Alternative is working fine, compared to developing 177,000 acres under the DRECP.
- Why does the DRECP need to dispose of public lands managed by the BLM in the DFAs and non-designated areas? If only 177,000 acres are to be developed, why dispose of hundreds of thousands of acres of public lands in DFAs?
- If you call something an ERMA, how can you not expect it to attract extensive OHV recreation? Where is the analysis in the Draft EIR/EIS on the effects of this and SRMA designations?
- The GCP and NCCP are relying on compromised lands south of Edwards and east of California City. How is conservation in these areas able to offset the impacts of developing tortoise critical habitat?
- What is the conservation value in allowing development in the DTRNA, with even the preferred alternative calling for a 250-acre reduction?
- Since mitigation is currently 5:1 in DWMAs, why would 5:1 be restricted to only critical habitat in the DRECP?
- How can USFWS both write the plan and independently issue a biological opinion on it?
- It is disingenuous to report that declines of tortoise and Mohave ground squirrel are foreseeable events and therefore will not affect the function of the plan.

- If critical habitat is the basis for NCL designation, why is the Ord-Rodman Critical Habitat Unit the only one so designated?
- How can competitive OHV events be allowed in critical habitats when they are not allowed under current management?
- USFWS has a 254-page GCP and CDFW has only three pages in the NCCP; in effect, there is no NCCP, which could not be funded. Where is the NCCP document?
- Every alternative opens up critical habitat to development, which is not allowed under current management. Why is this construed as conservation?
- Finally, you are opening the entire desert and changing the face of the CDCA to accommodate a single use. These changes will open the door to new impacts that would not exist but for the DRECP. The Draft EIR/EIS fails to indicate how many tortoises will be lost to disposal of public lands, elimination of Multiple-Use Classes, introducing competitive vehicle events into tortoise critical habitats, re-designating areas as SRMAs and ERMAs, and identifying DFAs in critical habitat.

Thanks for your time,

Sincerely,

A handwritten signature in blue ink, appearing to read "E. LaRue, Jr.", is centered on a light blue rectangular background.

Circle Mountain Biological Consultants, Inc.
Edward L. LaRue, Jr., M.S.