

## Energy - Docket Optical System

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**From:** Glenn R. Stewart <grstewart@cpp.edu>  
**Sent:** Monday, February 23, 2015 4:55 PM  
**To:** Energy - Docket Optical System  
**Subject:** DRECP NEPA/CEQA  
**Attachments:** PastedGraphic-1.pdf; ATT00001.txt

California Energy Commission

**DOCKETED**

**09-RENEW EO-1**

TN # 75082

FEB 23 2015

California Energy Commission,

As a Professor Emeritus of Zoology and Environmental Science, I have reviewed the massive DRECP with the Draft EIR/EIS and find the document seriously flawed in many ways. For a detailed critique, please see the extensive comments submitted earlier today by the Desert Tortoise Council. In this personal note, I want to highlight one of the most egregious flaws I have identified - the total disregard (disrespect may be a more appropriate term) for the existence and continued well-being of the Desert Tortoise Research Natural Area (DTRNA) in Kern County near California City.

In 1973, I was one of a group of biologists from academia, the California Department of Fish and Game (now Dept. of Fish and Wildlife), and Bureau of Land Management (BLM) who spend the better part of a beautiful spring day exploring the property and documenting the site's rich biodiversity representative of the Western Mojave Desert. Of particular interest to us was the thriving population of Desert Tortoises, a species declining throughout much of the Mojave Desert and destined to be listed by both the state and federal governments as threatened some 16 or 17 years later. Based on our preliminary survey, the property (now encompassing nearly 40 square miles) was set aside in 1974 to be managed cooperatively by the Desert Tortoise Preserve Committee (DTPC) and BLM. Over the ensuing years, the DTPC has worked to fence much of the boundary to exclude off road vehicles and gazing livestock, and to acquire private inholdings. In keeping with its designation as a Research Natural Area, significant research on the Desert Tortoise, Mohave Ground Squirrel and a number of other threatened or sensitive species is on-going there, and the area also serves as an important educational site for school children and all kinds of other visitors interested in learning about desert ecology and wildlife.

Yet, in spite of this 40-year history of legal recognition and protective management, all of the action alternatives in the DRECP surround the DTRNA on the south, west and north with Development Focus Areas (DFAs), some permitting solar power plants to be constructed right up to the western boundary and even taking a portion of the northern land within the DTRNA. Even those DFAs that might be a kilometer or so away can be expected to be a problem by generating dust and other air pollution, and also creating a "heat island" effect that could raise the maximum daily temperature by 0.4 to 0.75 degrees Celsius. That the DRECP permits this, and the Draft EIR/EIS does not acknowledge the DTRNA as Legislatively and Legally Protected Area (LLPA), is a gross oversight, to say the least.

This outrageous situation can not stand! The DTRNA must be provided the recognition and protection that it deserves, both legally and morally!!

Thank you for your attention to my comments!