February 5, 2015

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Draft DRECP EIS/EIR Development Focus Areas, Imperial County.

Dear Sirs,

I have had the opportunity to review the Development Focus Areas (DFA) for the DRECP Preferred Alternative and wanted to bring two areas of high cultural resources sensitivity to your attention. My own previous research in Imperial County and the Colorado Desert over the past 35 years and a review of site location data at my command indicate both areas have high densities and diversity of preserved cultural resources. Without getting into detail on the types of resources and specific locations, I can generally indicate those areas of high sensitivity. They include:

1. The area of East Mesa north of State Route 78 between the Imperial Sand Dunes and agricultural lands. Target 95, administered by Navy Air Field, El Centro, is at the center of this area.

2. The checkerboard of public and private lands to the west of Salton City and any undeveloped lands in the vicinity of State Route 86 in this area.

I would recommend that these areas be withdrawn from the DFA, or if they cannot, that renewable energy applications be limited to geothermal projects which can be more effectively designed to avoid significant cultural resources.

Otherwise, I support and commend your obvious efforts to direct renewable energy development applications to previously disturbed agricultural lands and areas of otherwise low sensitivity for impacts to cultural resources.

Thank you for the opportunity to comment.

Sincerely yours,

Jerry Schaefer, Ph.D.
Director and Principal Investigator
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Response to Comment Letter E20

ASM Affiliates
Jerry Schaefer, PhD, Director and Principal Investigator
February 5, 2015

E20-1 Thank you for your comment. No change in the document is required as a result of this comment.

E20-2 While this comment has not resulted in a change in the document, the BLM has taken it into consideration.

E20-3 While this comment has not resulted in a change in the document, the BLM has taken it into consideration.

E20-4 Following release of the Draft DRECP and in response to public comments received from a diverse group of stakeholders, the REAT Agencies (i.e., Bureau of Land Management [BLM], U.S. Fish and Wildlife Service [USFWS], California Energy Commission, and California Department of Fish and Wildlife [CDFW]) have adjusted the planning process and are employing a phased approach for the DRECP: one phase addressing BLM lands and another phase addressing non-federal lands. Under Phase I of the DRECP, the DRECP BLM LUPA and FEIS addresses land uses, including renewable energy and transmission development, on BLM-administered lands only. See also Volume II which includes revised descriptions and mapping for the range of alternatives considered for the BLM LUPA. See also Volume II, Section II.3.4.2 for revised CMAs that apply to activities on BLM-administered lands, including CMAs limiting geothermal development activities in specific DFAs in Imperial Valley to no surface occupancy.

E20-5 While this comment has not resulted in a change in the document, the BLM has taken it into consideration.
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