California Energy Commission
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January 22, 2013

Subject: DRECP Description and Comparative Evaluation of Alternatives

Dear Commissioner Douglas, Director Bonham, Director Kenna, and Director Lohoefner,

Please consider the following comments on the Desert Renewable Energy Conservation Plan (DRECP) interim description and comparative evaluation documents posted under Docket Number 09-RENEW EO-01 on 17 December 2012.

As a frequent hiker, camper and photographer in California's desert region, I strongly support the Renewable Energy Action Team (REAT) agencies' examination of alternatives that would implement the maximum conservation of our desert wildlands using the most durable policy solutions at our disposal. Although the urgency of climate change demands immediate action, the flexibility of our technological solutions enables us to encourage clean energy generation in our cities, and on already–disturbed lands. The burden of renewable energy development and job creation does not rest entirely on our intact ecosystems since renewable energy technology can be scaled and deployed in a manner to avoid new disturbance of our desert wildlands.

The California Desert Conservation Area (CDCA) has already shouldered the negative impacts of edge effects of growing population centers, expanding military training centers, climate change, invasive species, recreation demands, mining, and transportation infrastructure since it was initially established in the Federal Land and Policy Management Act (FLPMA) of 1976. According to the FLPMA, Title VI, Section 4:

"…the use of all California desert resources can and should be provided for in a multiple use and sustained yield management *plan to conserve these resources for future generations*, and to provide present and future use and enjoyment,…"

Although not explicitly mentioned in the Act, renewable energy development now constitutes an imminent threat to the conservation ethic prescribed for the CDCA, exhibiting a capacity to bulldoze and destroy hundreds of square miles of desert habitat. This extent of "multiple use" almost certainly was not envisioned by the CDCA's authors, and is certainly not consistent with the legislation's call for conserving the CDCA plan area's resources for future generations. As noted in the FLPMA, "the California desert environment is a total ecosystem that is extremely fragile, easily scarred, and slowly healed." Industrial-scale energy development covering thousands of acres is arguably incongruent with the conservation objectives of the CDCA, and would outpace the scale of threats that prompted the CDCA in the first place – off-highway vehicle recreation and mining.

During the 9 January meeting to discuss interim alternatives in the DRECP, it was stated that the Desert Conservation Lands (DCLs – a mix of ACEC and NCLS land designations) currently would not permit any new disturbance for renewable energy projects, as outlined in Appendix E of the documents made available on 17 December 2012. I strongly support this condition – DCLs offering maximum protection to wildlands contained within -- as the heart of the preferred alternative in the eventual environmental impact statement.

I recommend that ACEC and NLCS protections be afforded to BLM lands of high biological sensitivity in the western Mojave Desert, no matter which alternative is chosen. No matter the scale of renewable energy development projected for the western Mojave, the intact habitat in this area will be under pressure from other forces, including urban sprawl (expansion of the Victor Valley and Palmdale population centers) and transportation corridors (proposed High Desert Corridor highway and possible high speed rail link between Victorville and Palmdale). Even if the value of the intact habitat is not fully understood, it behooves land planners to error on the side of caution and protect potential wildlife linkages for further study.

The mix of private and public lands in the western Mojave Desert likely will result in continued development – urban and industrial – regardless of the alternative chosen by the REAT agencies, and only a thorough package of BLM and county measures designed to encourage conservation are likely to preserve the most critical habitat linkages remaining in the western Mojave.

Linkages deserving NLCS and ACEC protection include the swath of desert habitat on public lands crossing Highway 18 in the Lucerne Valley, lands north and northeast of the Victor Valley, and the potential habitat linkage crossing Highway 138 just east of Palmdale and northwest of Wrightwood. Although the alternatives proposed in the interim documents confer varying, or no protection for these lands, they likely deserve maximum conservation status regardless of the development scenarios chosen in the environmental impact statement.

Sincerely,
Shaun Gonzales